

GRID Communications Data Protection Policy

Background

This Data Protection Policy describes how GRID Communications Pte. Ltd. (collectively, "Organisation" or "we" or "us" or "our") may collect, use, process and/or disclose your Personal Data in accordance with the Personal Data Protection Act 2012 ("Act").

Definitions

For the purposes of this Policy, the following capitalized terms, unless elsewhere defined in this Policy, shall have the following meanings:

"Act"	means the Personal Data Protection Act 2012.
"DPO"	means the data protection officers appointed by us pursuant to the Act.
"Laws"	means all applicable legal, governmental, statutory and/or regulatory requirements, restrictions and/or prohibitions, orders, judgements, injunctions, guidelines codes of practice, directives, policies or measures of any kind on the part of any Public Agency.
"Policy"	means this Data Protection Policy, as may be revised, amended or supplemented from time to time.
"Personal Data"	means data, whether true or not, about an individual who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access. Examples of such Personal Data include: (a) Contact information, including name, address, telephone number and e-mail address and/or other identification information; (b) Billing information, including payment details, credit history, credit card number, and/or bank account number; (c) Equipment information and other technical information about your use of our network, products, services or websites, including service and usage history; (d) Your preferences; and (e) Information from other organisations which include fraud prevention agencies, credit reference agencies which are authorised, or purported to be authorised, to provide your personal data on your behalf.
"Public Agency"	means any and all government, regulatory body, court or competent authority in all applicable jurisdictions including any Government body (such as any ministry, department, agency (including law enforcement agencies)), any organ of State, any judicial or quasi-judicial body or disciplinary,

	arbitral or mediatory body appointed under any written law in Singapore or any statutory body established under a public Act for a public function that is so appointed by the Minister by notification in the Gazette for the purposes of the Act.
"Services"	means the info-communications and telecommunications services and any other services as may be offered by us to you including any updates, upgrades, thereto and the sale or supply of goods or products, from time to time and maintenance or deactivation of the same.

Interpretation

- References to the male gender include a reference to the female gender.
- References to the singular include a reference to the plural as the context so requires.
- Whenever the words “include”, “includes” or “including” are used in such in this Policy, they will be deemed to be followed by the words “without limitation”.

Policy Provisions

1. Data Protection Officers

1.1 The DPO have been appointed to oversee our compliance with the Act. Other employees within the Organisation may be delegated to act on behalf of the DPO or to take responsibility for the day-to-day collection and processing of Personal Data.

1.2 The DPO may be contacted by physical or electronic mail to the respective addresses:

1 Lorong 2 Toa Payoh, #03-01, Braddell House, Singapore 319637

Email: DPO@gridmobile.com.sg

2. Collection of Personal Data

2.1 Your Personal Data may be collected by us in the following ways:

- When you make a purchase or when you subscribe or apply for our Services;
- When you enquire about our Services with us or contact us (for example, via the live chat function on our website(s) or our social media platforms);
- When you use our network and our Services or products;
- Through the use of technology when you use our websites (e.g. cookies), when you contract with us or with any third parties via our websites or when you download and/or use any of our application programs/software;
- From other sources, such as your employers, credit agencies, law enforcement agencies and/or other Public Agencies;
- From other telecommunications licensees;

- From other service providers;
- When you participate in a competition, lucky draw or survey, or register your interest for any specific products or Services;
- When you purchase or obtain third party services or products through us;
- When we receive references from third parties, where you have been referred by them;
- When we lawfully seek information from third parties about you in connection with the products and services you have applied for;
- When you submit your Personal Data to us for any other reasons; and/or
- By such other lawful means.

3. Purposes for Collection, Use and Disclosure of Personal Data

3.1 By engaging with us, you hereby consent to the collection, use and/or disclosure of your Personal Data by us for any or all of the following purposes:

- To verify your identity;
- To process orders and applications for Service(s);
- To provide the Service(s) and where applicable to facilitate interconnection and inter-operability between service providers including telecommunications licensees in providing the Service(s);
- To respond and deal with enquiries, requests, feedback or complaints and for other customer-care activities;
- To generate bills, process and facilitate the payment of bills, manage accounts and for debt-recovery functions;
- To carry out credit checks, including for the preparation of credit reports and for the evaluation of creditworthiness;
- To manage, develop and improve our Services, business and operations (including for the purposes of internal training and quality control) to serve you better;
- To provide delivery and directory assistance services;
- To provide complementary or value added services;
- To offer and administer customer loyalty benefits, reward benefits, promotional benefits, contests and lucky draws;
- To provide self-service channels for customer-care and account management activities;

- To carry out market research and customer surveys and other research, analysis and development activities (including, but not limited to, data analytics);
- To conduct investigations or take action in relation to bad debts;
- For the purposes of crime and fraud prevention, detection or prosecution, risk management, or to prevent harm to you or the Organisation;
- To conduct investigations or take action in relation to any violation of any of our terms and conditions for Services, including our General Terms and Conditions, or our Acceptable Use Policies;
- To facilitate the provision of third party services to you where such third party services are purchased, obtained, administered or processed through us;
- To improve your user experience and/or our product and service delivery to you;
- To send you notices, information, promotions and updates, including marketing and advertising materials relating to our Services and products;
- To respond to legal processes or to comply generally with Laws, including, without limitation, meeting the requirements to make disclosure under the requirements of any Laws or assisting in law enforcement and investigations by the relevant Public Agencies;
- Any other purposes for which you have provided your Personal Data; and/or
- Any other purpose necessary, ancillary or consequential to the above specified purposes.

3.2 Your Personal Data may be disclosed for the purposes indicated above to our officers and employees, service providers, and advisors, including without limitation, the following persons or entities:

- Our external service engineers, contractors, vendors, service providers, business partners and such other third parties;
- Banks, credit card companies, and payment vendors;
- Debt collection agencies;
- Credit information companies and credit bureaus;
- Channel partners;
- Public Agencies;
- Our advisors, including our auditors and lawyers; and
- Any other party to whom disclosure of Personal Data is required to achieve the purposes to which you have consented for the collection, use and disclosure of your Personal Data.

Where this involves the transfer of your Personal Data outside Singapore, we will comply with the Act and take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the Act.

3.3 Unless permitted by Laws, the Organisation will not collect, use or disclose your Personal Data for any other purpose which you have not consented to under the Act, without first identifying and documenting such other purpose(s) and obtaining your consent with respect to them.

4. Limiting Collection, Use and Disclosure of Personal Data

4.1 The Organisation collects Personal Data primarily from our customers (including prospective customers). The collection of Personal Data is limited to that which is necessary for the identified purposes to which you have consented for the collection, use and disclosure of your Personal Data.

4.2 Unless permitted by Laws or where you have given your consent, the Organisation will not disclose your Personal Data to other persons or entities for the advertising, promotion or marketing of such other party's products and services. The Organisation will never sell your Personal Data to anyone.

5. Retention of Personal Data

5.1 We will retain your Personal Data for as long as it is necessary to fulfil the purpose for which it is collected or where necessarily required for business or legal purposes.

6. Withdrawal of Consent

6.1 You are able to withdraw your consent to our continued use and disclosure of your Personal Data as described in this Policy at any time. Such withdrawal should be made formally in writing to the DPO. We shall process your withdrawal request within a reasonable time (depending on the complexity of the request and its impact on our relationship with you), and in any event no later than within thirty (30) business days of receiving your request.

6.2 You acknowledge that we may no longer be able to provide you with the Service(s) you have subscribed to should you proceed to withdraw your consent under the Act. Accordingly, we may, for example where your consent is integral to the provision of the Service(s), cease to provide the Service(s) to you. Notwithstanding any withdrawal of consent, unless otherwise agreed by us, you will still be bound by your contract(s) for the Service(s) with us, and should you choose to terminate the relevant contract(s), early termination charges and other charges, penalties or contractual consequences may apply in accordance with the contract(s) or under Laws and we reserve our rights thereof.

6.3 You may write to the DPO for more information regarding the implications of the withdrawal of your consent.

6.4 Where you have indicated your consent to receiving marketing communications from the Organisation, you may separately withdraw such consent via the unsubscribe options as stated on the relevant SMS or email marketing message, via the self-help portal on our website or by emailing us at support@gridmobile.com.sg.

7. Protection of Personal Data

7.1 We will make reasonable and appropriate security arrangements to protect Personal Data in our possession or under our control against risks of unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

8. Accuracy and Correction of Personal Data

8.1 We will use reasonable efforts to ensure that the Personal Data we use is sufficiently accurate and complete to minimize the possibility that your incorrect Personal Data may be used to make a decision that impacts you, or if such Personal Data is likely to be disclosed to a third party.

8.2 We encourage you to inform us when there are any changes to the Personal Data which you have provided to us, to ensure that we have the most current, accurate and complete information. Upon your written request to DPO@gridmobile.com.sg, we may, in accordance with the Act, correct or complete any Personal Data found to be inaccurate or incomplete as soon as practicable. The Organisation reserves the right to not correct Personal Data where permitted under the Act.

8.3 We will respond to your correction request as soon as reasonably possible, and in any event no later than within thirty (30) days of receiving your written request to support@gridmobile.com.sg.

9. Access to Personal Data

9.1 Unless any of the exceptions under the Act apply, upon your written request to the DPO, the Organisation will provide you with an account of your Personal Data which is in the Organisation's possession or control, or information relating to how your Personal Data has been or may have been used or disclosed within a year before the date of such request. Such information requested for shall be provided within a reasonable time (and in any event no later than within thirty (30) days). We reserve the right to charge a reasonable administrative fee for processing requests for access. If so, we will inform you of the fee before processing your request.

9.2 The Organisation may also provide a standard list of possible third parties as part of its response to all access requests for information relating to the disclosure of Personal Data during the relevant period.

9.3 Subject to the Act, we may not be able to provide access to all of the Personal Data that we may hold about you. For example, the Organisation may not provide access to Personal Data if such provision could reveal Personal Data about another person, if such information is subject to legal privilege or if such provision will be contrary to national interest. If access to Personal Data cannot be provided, the reasons for denying access will be provided upon request, to the extent permitted under Laws.

10. Do Not Call (DNC)

10.1 We will not send any marketing messages or make any marketing calls to you if you have registered your Singapore telephone number with the respective DNC registries, unless we are allowed to do so under the Act.

11. General

11.1 We may revise and/or amend and/or supplement this Policy at our discretion from time to time. Such changes will be published on [www.gridmobile.com.sg/pdpa]. You are advised to check back periodically to ensure that you are aware of any changes to this Policy.

11.2 If you have any queries or comments on this Policy, please contact the DPO at DPO@gridmobile.com.sg.

Version date: [27 June 2019]