



PRIVACY POLICY

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HOOLAH PRIVACY POLICY (SINGAPORE)

INTRODUCTION

This privacy policy (“**Privacy Policy**”) sets out basis which Hoolah Singapore Pte. Ltd. (UEN: 201813385Z) (“**hoolah**”, “**we**”, “**us**” or “**our**”) may collect, use, process, disclose and/or transfer personal data (defined below) in accordance with the Singapore Personal Data Protection Act (“**PDPA**”).

This Privacy Policy applies to personal data of individuals (“**you**”, or “**your**”) in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, process, disclose and/or transfer personal data for our purposes.

DEFINITIONS AND INTERPRETATION

The following definitions apply in this Privacy Policy unless inconsistent with the context or otherwise specified:

“hoolah Group”	means hoolah, any of its parents, subsidiaries (as defined in the Singapore Companies Act, Cap. 50) and/or affiliates.
“hoolah mobile application”	means the mobile application developed by hoolah for merchants and consumers to use the Services.
“hoolah Payment System”	means the system developed by hoolah for the implementation and administration of an online instalment payment solution, which includes performing validation checks and assessments on consumers and merchants using the system, managing accounts and processing transactions and requests.
“hoolah portal”	means the online portal provided by hoolah to merchants and consumers to manage their respective accounts on the hoolah Payment System.
“hoolah website”	means https://www.hoolah.co/ .
“personal data”	means any data, regardless of its format, about an individual who can be identified from that data or from that data and other information to which an organisation has or is likely to have access.
“Services”	means the provision of the hoolah Payment System and any other services which may be provided by hoolah from time to time.

Other terms used in this Privacy Policy shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION OF PERSONAL DATA

Depending on the nature of your transaction with us, the personal data which we may collect from you includes (but is not limited to) your name and identification information such as your local identification number, contact information such as your address, email address or telephone number, nationality, gender, date of birth, location and financial information such as credit card numbers, debit card numbers or bank account information.

Such personal data may be collected from you or from persons authorised by you to disclose your personal data to us through the following means, which are not exhaustive:

- creation of an account in the hoolah Payment System;
- creation of an order in the hoolah Payment System;
- use of the hoolah website, hoolah mobile application and/or the hoolah portals;
- provision of your contact details as an authorised representative of your company; and
- any interaction with us, including but not limited to any email exchange with us;

We may also receive personal data regarding you from third parties and other sources in the following circumstances:

where you create an account and connect to the Service using the credentials of a social networking site such as Facebook, and in such case we will, and you authorise us to, access and/or receive your personal data (including but not limited to your name, email, gender, birthday and other information you make available on such social networking site) from such social networking site in accordance with their terms and conditions, and we will handle such personal data in accordance with this Privacy Policy;

where we conduct investigations on you as a result of a debt that you owe to us; and

where we have engaged a third party to collect a debt that you owe to us, and such third party has collected additional personal data about you as part of their debt collection process.

PURPOSES

We may collect, use, process, disclose and/or transfer your personal data for any or all of the following purposes:

- performing obligations in the course of or in connection with our provision of the Services requested by you;
- verifying your identity, including distinguishing you from another person with the same or similar details as yourself;
- processing any payment or credit transactions;
- managing your relationship with us;
- responding to, handling and processing queries, requests, applications, complaints and feedback from you;
- carrying out reasonable business activities such as audits, risk management, business reporting, service quality control, statistical and trend analysis and other related or similar activities;
- complying with any internal policies, applicable laws, regulations, codes of practice, guidelines or rules (including those related to fraud, anti-money laundering and anti-terrorism), or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- collection and satisfaction of any debt owed by you to us;
- reporting information about you to a credit bureau or agency where necessary;

sending you marketing communications including newsletters, notifications about new merchant additions, merchant engagements or merchant offers, conducting product surveys, advertising of similar products and services and event invitations, and you have the right to unsubscribe from such marketing communications;

enforcing or defending our rights, contractual or otherwise, including investigations and participating in potential or actual litigation, arbitration or other legal process;

any other purposes for which you have provided your personal data; and

any other incidental business purposes related to or in connection with the above.

These purposes may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

The personal data that you provide us will not sold, traded, licensed, offered or otherwise used for commercial marketing purposes that are not related to hoolah and/or the Services.

DISCLOSURE AND TRANSFER OF PERSONAL DATA

We may disclose and/or transfer your personal data both within and outside of Singapore for the purposes specified above and as permitted or required by applicable laws and regulations to the following entities:

any entity within the hoolah Group;

any persons and entities involved in the provision of the Services to you, including merchants, credit card companies and processors and third-party payment providers;

any third-party service provider, agent, contractor or other organisation which we have engaged to carry out any of the purposes specified above;

any third party involved in or in connection with potential or actual litigation, arbitration or other legal process with us;

any person or entity to whom we are under any obligation or otherwise required to make disclosure pursuant to legal process or legal or regulatory obligation or request, including disclosure to any relevant governmental and/or regulatory authorities, whether in Singapore or abroad.

any credit reference bureau or agency where necessary and appropriate; and

any person to whom disclosure is reasonable considered by us to be necessary.

We will reasonably endeavour to ensure that any third party who receives your personal data from us shall handle such personal data in accordance with the PDPA.

Where we transfer your personal data to countries outside of Singapore, we will obtain your consent for such transfer to be made and will 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 PDPA.

COOKIES

Cookies are files with small amount of data and may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

As with most websites, our website also uses cookies to collect information. Such cookies include:

strictly necessary cookies: such cookies are essential in order to enable you to navigate our website and use its features;

performance cookies: such cookies collect information on how visitors use our website and are used to improve our website;

functionality cookies: such cookies allow our website to remember choices that you make such as your account username and language and provide a personal experience; and

third party cookies: such cookies come with certain functions on our website for which we use third party suppliers such as Facebook Connect. In such case, we recommend that you consult the privacy policies of such third parties for information regarding their use of cookies.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our website. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

For more information on cookies generally and how to delete or reject them, you can visit www.allaboutcookies.org.

WITHDRAWING YOUR CONSENT

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing to our data protection officer at the contact details provided below.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the same manner.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

PROTECTION OF PERSONAL DATA

We are committed to protecting your personal data and will use reasonable endeavours to safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

In this respect, we have introduced appropriate administrative, physical and technical measures such as storing personal data on secured servers maintained in controlled facilities, using up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal

data by us, and we limit access to your personal data to authorised persons on a confidential and need-to-know basis.

In respect of your financial information, we use credit card processors that comply with strict industry standards and we implement techniques to allow payments to be processed in our systems without saving such financial information.

ACCURACY OF PERSONAL DATA

We generally rely on personal data provided by you or your authorised representative. In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our data protection officer at the contact details provided below.

ACCESS TO AND CORRECTION OF PERSONAL DATA

Subject to certain exceptions, you may request a copy of or correction to your Personal Data held by us by contacting our data protection officer at the contact details provided below.

Please note that a reasonable fee may be charged for an access request, and we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

RETENTION OF PERSONAL DATA

We may retain your personal data for as long as necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

CONTACT US

Should you have any questions regarding this Privacy Policy, or if you wish to make any request regarding your personal data, please contact our data protection officer by email at privacy@hoolah.co.

AMENDMENTS AND MODIFICATIONS

We may amend, vary or modify this Privacy Policy in its sole discretion from time to time without any prior notice. The latest version in force is available at <https://www.hoolah.co/privacy/>.

Your continued use of our Services after we update the the Privacy Policy on our website will constitute your acknowledgment of the revisions and your consent to abide and be bound by the latest version of the Privacy Policy.

GOVERNING LAW

This Privacy Policy shall be governed by and construed in accordance with the laws of Singapore.