## Data Protection Notice

This Data Protection Notice ("Notice") outlines the principles under which Royal Food Services (Singapore) Pte. Ltd. ("we", "us", or "our") may collect, use, disclose, or otherwise process the personal data of our customers, in accordance with Singapore's Personal Data Protection Act 2012 ("PDPA"). This Notice is applicable to all personal data that is within our possession or under our control, including any personal data managed by third-party organizations acting on our behalf for the stated purposes.

# Personal Data

For the purposes of this Notice:

- A "customer" refers to any individual who (a) has contacted us to inquire about our goods or services, or (b) has entered, or may enter, into an agreement with us for the provision of our goods or services.

- "Personal data" refers to any information, whether true or not, that can identify a customer: (a) directly from that data, or (b) from that data combined with other information that we either possess or are likely to access.

Depending on the nature of your interaction with us, examples of personal data that we may collect include your name, residential and billing addresses, email address, contact numbers, and credit card details.

All other terms used in this Notice shall carry the meanings ascribed to them in the PDPA, where applicable.

## Collection, Use, and Disclosure of Personal Data

We will not collect your personal data unless (a) you voluntarily provide it to us, either directly or through a third party authorized to act on your behalf, and after (i) being informed of the specific purposes for which the data is collected, and (ii) granting your consent in writing, or (b) the collection and use of your personal data is permissible under the PDPA or other relevant laws. Should we require additional personal data or wish to use your personal data for any purposes not previously communicated to you, we will seek your consent unless legally exempted from doing so.

We may collect and use your personal data for one or more of the following purposes:

- Fulfilling obligations related to the provision of goods and services that you have requested;

- Verifying your identity;

- Addressing inquiries, handling requests, processing applications, and responding to feedback;

- Managing our business relationship with you;

- Processing payment transactions;

- Complying with applicable laws, regulations, and guidelines or assisting regulatory authorities in enforcement or investigation processes;

- Sharing data with unaffiliated third parties, including service providers, agents, or regulatory authorities, within or outside of Singapore, for the above-mentioned purposes; and

- Any other incidental or related business purposes.

We may disclose your personal data under the following circumstances:

- When it is necessary to fulfil obligations related to the provision of requested goods or services; or

- To third parties, including service providers, agents, or organizations engaged by us to perform any of the functions outlined above.

The purposes outlined above may continue to apply even after your business relationship with us has ended, where reasonable and necessary for purposes such as enforcing our rights under a contract with you.

#### **Reliance on Legitimate Interests Exception**

In accordance with the PDPA, we may collect, use, or disclose your personal data without consent if it is necessary for our legitimate interests or those of another person. When relying on this exception, we carefully assess the potential impact on individuals and ensure that our legitimate interests outweigh any potential adverse effects.

Examples include:

- Fraud detection and prevention;
- Prevention of service misuse;
- Network monitoring to prevent financial crimes or perform credit analysis;
- Data loss prevention on company-issued devices.

These purposes may continue even after your relationship with us ends, for a reasonable duration.

## Withdrawal of Consent

The consent you have provided for the collection, use, or disclosure of your personal data remains valid until you withdraw it in writing. You may submit a written request to withdraw your consent by contacting our Data Protection Officer (DPO) via email or mail, as provided below.

Please note that processing your request may require reasonable time, depending on its complexity. In general, we will respond within 14 business days. Withdrawing consent may affect our ability to provide you with goods or services, and we will notify you of any legal implications prior to proceeding with your request. Should you decide to reverse your withdrawal, you can notify us in writing at any time.

Please be aware that withdrawing consent does not affect our right to collect, use, or disclose personal data where permitted by law.

#### Access to and Correction of Personal Data

If you wish to access or correct your personal data, you may submit your request to our DPO in writing or via email. A reasonable fee may be charged for access requests, and we will inform you of this fee in advance.

We aim to respond within 7 business days. If we require more than 30 days to respond, we will notify you in writing. If we are unable to provide the requested personal data or make corrections, we will explain the reasons, where legally required.

## **Protection of Personal Data**

We take all reasonable precautions to safeguard your personal data from unauthorized access, collection, use, disclosure, or similar risks. This includes implementing security measures such as encryption, data anonymization, access controls, and up-to-date antivirus protection. However, please note that no data transmission or storage method is completely secure, and while we strive to protect your data, we cannot guarantee absolute security.

# **Retention of Personal Data**

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected or as required by law. Once your personal data is no longer needed, we will either securely dispose of it or anonymize it, where appropriate.

# **Overseas Data Transfers**

In general, we do not transfer personal data outside of Singapore. If we do so, we will seek your consent and ensure that the transferred data receives the same level of protection as it does under Singaporean law.

## **Contact Information for the Data Protection Officer**

If you have any inquiries or wish to exercise your rights under this Notice, please contact our Data Protection Officer at:

- Email: customerservice@royalhost.com.sg

- Address: Royal Food Services (Singapore) Pte. Ltd., 1 Wallich Street, #24001, Guoco Tower, Singapore

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Effective Date: 24 October 2024

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