

## **PDPA**

The protection of your personal data is important to Float Foods, and we aim to comply with the requirements of the (“PDPA”) in respect of the collection, use and disclosure of your personal data.

This Privacy Policy outlines how Float Foods Pte Ltd and its related entities manage Personal Data (as defined below), in compliance with the requirements of the Personal Data Protection Act 2012 (“PDPA”).

(A) By interacting with Float Foods, submitting information to Float Foods or using any products or services offered by Float Foods, you agree and consent to Float Foods collecting, retaining, processing, using, disclosing and transferring your Personal Data to Float Foods’s authorised service providers and relevant third parties in the manner set out in this Privacy Policy.

(B) This Privacy Policy supplements and does not supersede nor replace any other consents you may have previously provided to Float Foods in relation to your Personal Data. Your consents shall be valid and effective notwithstanding any current or future registration made by you on the Do-Not-Call-Registry and are additional to any rights that Float Foods may have at law to collect, retain, process, use, disclose or transfer your Personal Data.

(C) Float Foods may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with its future business, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as may be updated by Float Foods from time to time.

### **Personal Data**

1.1 In this Privacy Policy, “Personal Data” means any data about an individual who can be identified:

- (a) from that data; or
- (b) from that data and other information to which Float Foods has or is likely to have access to, including data in Float Foods’s records as may be updated from time to time.

1.2 Types of Personal Data that may be provided to or collected by Float Foods include but are not limited to:

- (a) name;
- (b) NRIC, passport or other personal identification number;
- (c) telephone number;
- (d) fax number;

- (e) mailing address;
- (f) e-mail address; and
- (g) any other information relating to you or other individuals that you have provided to Float Foods.

## Collection of Personal Data

2.1 Float Foods may collect your Personal Data in the following ways:

- (a) when you submit any form relating to Float Foods's products and/or services, including but not limited to order forms and customer inquiry forms
- (b) when you use Float Foods's services or purchase Float Foods's products
- (c) when you interact with Float Foods's officers, employees, representatives and agents via telephone calls, letters, fax, face-to-face meetings, events, workshops, seminars, social media platforms and e-mails;
- (d) when you request for Float Foods to contact you or include you in its e-mail mailing lists or other mailing list in connection with updates to Float Foods's products and services;
- (e) when you respond to Float Foods's marketing promotions or initiatives or when you are contacted by and respond to Float Foods's officers, employees, representatives and agents;
- (f) when you enter into any agreement or provide other documentation or information in relation to your interactions with Float Foods;
- (g) via Float Foods's website, which does not automatically collect your Personal Data unless you provide such information to Float Foods;
- (h) when you respond to Float Foods's request for additional information to supplement your Personal Data;
- (i) when Float Foods requests for your information and receive your Personal Data in connection with your relationship with Float Foods, for example, from your business partners, public agencies and relevant authorities;
- (j) when your images are captured by Float Foods on its CCTV cameras installed on its premises or photographs or videos taken by Float Foods when you attend its events, workshops or seminars; and/or
- (k) when you submit or disclose your Personal Data to Float Foods for any other reasons.

2.2 If you provide Float Foods with any Personal Data relating to a third party, you represent to Float Foods that you have obtained the consent of that third party to provide Float Foods with its Personal Data.

2.3 You shall make reasonable efforts to ensure that all Personal Data provided to Float Foods is complete, accurate, true and correct. Further, you shall give Float Foods notice in writing as soon as reasonably practicable should your Personal Data be updated or changed after such disclosure, in accordance with Clause 7 below. Failure to do so may result in Float Foods's inability to provide to you with any products and services as requested.

## Purposes for the Collection, Retention, Process, Use, Disclosure and Transfer of Personal Data

3.1 Float Foods collects, retains, processes, uses, discloses and transfers your Personal Data for and in connection with the following purposes:

- (a) verifying your identity;
- (b) conduct of any examinations or tests and related activities by Float Foods upon your request;
- (c) providing any of Float Foods's products and/or services to you;
- (d) providing marketing materials and relevant information to you, including but not limited to information and any updates on Float Foods's products and services, newsletters, healthcare-related information and any upcoming events, workshops and seminars organised by Float Foods;
- (e) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes in connection with Float Foods's business and/or to review, develop and improve Float Foods's product and service offerings;
- (f) providing customer service and support (including but not limited to customer relationship management, providing follow-up calls and providing you with administrative support);
- (g) responding to, processing and handling your queries, feedback, complaints and requests;
- (h) if you use Float Foods's current or future websites, mobile applications or online registration and payment systems, displaying your Personal Data on such websites, mobile applications or online registration and payment systems to facilitate the provision of Float Foods's services to you;
- (i) administering and processing your requests, including creating and maintaining profiles of Float Foods's customers in Float Foods's system database for administrative purposes;
- (j) liaising with chefs and customers from restaurants, cafes, hotels in relation to your service requests;
- (k) managing and planning the administrative and business operations of Float Foods and complying with its internal policies and procedures;
- (l) monitoring or recording telephone calls and customer interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (m) in connection with any claims, actions or proceedings (including but not limited to obtaining legal advice and facilitating dispute resolution), and/or protecting and enforcing Float Foods's contractual and legal rights and obligations;
- (n) complying with any applicable laws, regulations, rules, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Float Foods (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations);
- (o) administering debt recovery and debt management;
- (p) taking or filming photographs and videos for corporate publicity or marketing purposes, and featuring your photographs and/or testimonials in our articles and publicity materials;

- (q) organising roadshows, seminars, campaigns and promotional events; and/or
- (r) purposes which are reasonably related to the aforesaid.

3.2 If you have provided Float Foods with your telephone number, fax number, mailing address and/or e-mail address and indicated that you consent to receiving information from Float Foods via telephone calls, SMS messages, data messages, fax, post or e-mails, Float Foods may contact you from time to time using the foregoing methods for the purposes listed in this Clause 3.

3.3 In relation to the provision of Float Foods's products or services to you or in your interactions with Float Foods, Float Foods may have notified you of other purposes for which it collects, retains, processes, uses, discloses or transfers your Personal Data, in addition to those listed in Clause 3.1 above. Float Foods may collect, retain, process, use, disclose or transfer your Personal Data for such additional purposes, unless Float Foods has specifically notified you otherwise.

#### Disclosure of Personal Data

4.1 Float Foods may disclose or transfer your Personal Data to the following entities or parties for the purposes listed above in Clause 3 where necessary:

- (a) amongst Float Foods's affiliates;
- (b) industry & research institutions;
- (c) Float Foods's professional advisers such as consultants, auditors and lawyers;
- (d) companies providing insurance services to Float Foods;
- (e) agents, contractors, sub-contractors or third party service providers who provide operational and logistics services to Float Foods, such as courier services, telecommunications, information technology, payment, printing, billing, debt recovery, processing, technical services, transportation, training, market research, call centre, security or other services;
- (f) vendors or third party service providers and Float Foods's marketing and business partners in connection with its marketing events, promotions, products and services;
- (g) external banks, credit card companies, other financial institutions and their respective service providers;
- (h) relevant government ministries, regulatory bodies, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or directives imposed by any governmental authority; and/or
- (i) any other party to whom you authorise Float Foods to disclose your Personal Data to.

#### Retention of Personal Data

5.1 Float Foods shall retain your Personal Data as may be required for its legal or business purposes until such time that Float Foods reasonably determines that such Personal Data is no longer necessary for its legal or business purposes.

5.2 Float Foods protects and keeps your Personal Data safe by:

- (a) only disclosing your Personal Data to such entities or parties listed in Clause 4 above;
- and

(b) taking reasonable measures to protect your Personal Data from unauthorised access, use or disclosure.

5.3 Float Foods is committed to maintaining the confidentiality of your Personal Data, and under no circumstances shall Float Foods sell, rent or share your Personal Data with any unrelated third parties.

#### Use of Float Foods's Website

6.1 When you visit Float Foods's website <>, you generally do so anonymously but the following information may be tracked and collected by Float Foods:

- (a) IP address;
- (b) domain server;
- (c) type of computer used to access Float Foods's website;
- (d) type of web browser used to access Float Foods's website;
- (e) the previous website which directed you to Float Foods's website; and
- (f) other information associated with the interaction of your browser and Float Foods's website.

6.2 When you visit or interact with Float Foods or its authorised service providers' websites, Float Foods or its authorised service providers may use cookies, web beacons and other similar technologies for collecting and storing information to provide you with a better, faster, and safer web experience.

6.3 The information collected by Float Foods or its authorised service providers may recognise a visitor as a unique user and may collect information including but not limited to how a visitor arrives at its websites, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page). By visiting or interacting with Float Foods or its authorised service providers' websites, you are deemed to have consented to the collection of the aforesaid information.

6.4 Float Foods may use the terms "cookies" or "similar technologies" interchangeably in its policies to refer to all technologies that it may use to collect or store information in your browser or device or that collect information or assist in identifying you as a unique user in the manner described above.

6.5 Float Foods offers certain site features and services that are available only through the use of these technologies. You may block, delete, or disable these technologies if your browser permits. However, if you decline cookies or other similar technologies, you may not be able to use certain site features or services tools on Float Foods's websites.

6.6 Float Foods's website may contain links to other websites operated by third parties, including but not limited to Float Foods's service providers or business partners. Float Foods shall not be responsible for the data protection practices of such third party websites that are linked to its website.

#### Withdrawal of Consent, Access and Correction of Personal Data

7.1 You may withdraw your consent for Float Foods to use your Personal Data for the purposes listed in Clause 3 above, in accordance with this Clause 7. Upon receiving such

notice from you, Float Foods may require up to thirty (30) days to process the withdrawal of your consent and securely dispose your Personal Data. During this period, Float Foods shall be entitled to continue using your Personal Data for the purposes listed in Clause 3 above. Notwithstanding any withdrawal of consent by you, Float Foods may contact you for other purposes in relation to the existing products and/or services that you have requested or purchased from Float Foods.

7.2 If you:

- (a) have any questions or feedback relating to your Personal Data or this Privacy Policy;
- (b) would like to withdraw your consent to use of your Personal Data as set out in this Privacy Policy; or
- (c) would like to obtain access and/or make corrections to your Personal Data records, please contact our Data Protection Officer as follows:
  - (a) Telephone No.: +65 8189 2289
  - (b) E-mail: keshav@floatfoods.com
  - (c) Address: 9 Chin Bee Dr, Singapore 619860

7.3 If your Personal Data has been provided to Float Foods by a third party, you should contact that organisation or individual to make such queries, complaints, and access and correction requests to Float Foods on your behalf.

7.4 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Float Foods may not be in a position to continue to provide its products and services to you, or administer any contractual relationship in place, which in turn may also result in the termination of any agreements with Float Foods, and your being in breach of your contractual obligations or undertakings. Float Foods's legal rights and remedies in such event are expressly reserved.

## Indemnity

8.1 You shall indemnify Float Foods and its officers, employees, representatives and agents against all actions, claims, demands, losses, damages, expenses and costs arising out of any of your acts, omission or negligence that cause or result in Float Foods to be in breach of the PDPA or other applicable laws.

## Governing Law

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