

**ANDA PACIFIC PTE LTD
PRIVACY NOTICE**

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1. INFORMATION ABOUT US

- 1.1 This is the Privacy Notice for Anda Pacific Pte. Ltd. (“**Anda Pacific**”, “**we**” or “**us**”) a private limited company incorporated under Singapore law with registration number 201213299Z. It explains how we collect, share and use your Personal Information.
- 1.2 For more information about Anda Pacific and the Website, please see the “About Us” section of the Website at <https://www.andapacific.net/about>.

2. SCOPE OF PRIVACY NOTICE

- 2.1 This Privacy Notice applies to
- 2.1.1 all users of the Website;
 - 2.1.2 all users of Anda Pacific’s Services; and
 - 2.1.3 anyone who contacts or otherwise submits information to Anda Pacific via the Website.

3. PRIVACY NOTICE

- 3.1 Anda Pacific is committed to protecting and respecting your privacy when you use the Website.
- 3.2 Please read this Privacy Notice carefully to understand Anda Pacific’s views and practices regarding your Personal Information and how Anda Pacific will treat it.
- 3.3 Anda Pacific recommends that you print a copy of this Privacy Notice for future reference.

4. OUR COMMITMENT

- 4.1 We commit:
- 4.1.1 to use our best endeavours keep your Personal Information safe and private;
 - 4.1.2 unless otherwise agreed with you, not to sell your Personal Information; and
 - 4.1.3 to give you ways to manage and review your choices regarding Personal Information usage restrictions at any time.

5. PERSONAL INFORMATION WE COLLECT

- 5.1 Anda Pacific may collect Personal Information including:
- 5.1.1 [your given name;
 - 5.1.2 your family name;
 - 5.1.3 your email address;
 - 5.1.4 your physical mailing address;
 - 5.1.5 your country of residence;
 - 5.1.6 your phone number and/or mobile phone number; and
 - 5.1.7 any other information you provide to us or which we may request from you from time to time.

6. WHERE WE COLLECT PERSONAL INFORMATION FROM

6.1 Anda Pacific may collect Personal Information when:

6.1.1 you give us data, including when:

- (a) you talk to us on the phone;
- (b) you send us emails or letters;
- (c) we conduct background checks;
- (d) you request / use Services through the Website;
- (e) you contact Anda Pacific, for example to provide feedback or to request for assistance;
- (f) you complete surveys sent to you by Anda Pacific or on its behalf; and
- (g) you provide Anda Pacific with access to your public profiles (e.g. Facebook).

6.1.2 we receive data from other sources, including:

- (a) payment and/or financial service providers;
- (b) advertising networks;
- (c) analytics and search information providers; and/or
- (d) other third parties.

7. YOUR PROTECTIONS UNDER THE LAW

7.1 As well as under this Privacy Notice, the privacy of your Personal Information is protected by Applicable Law in relevant jurisdictions.

7.2 We will process your Personal Information in accordance with Applicable Law.

8. HOW WE USE DATA / INFORMATION

8.1 Anda Pacific may use information held about you in the following ways:

- 8.1.1 to carry out Anda Pacific's obligations and to provide you with the information and/or Services that you request from Anda Pacific;
- 8.1.2 to provide you, or permit selected third parties to provide you, with information about the Services;
- 8.1.3 to notify you about changes to the Services;
- 8.1.4 to administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- 8.1.5 as part of Anda Pacific's efforts to maintain the safety, security and integrity of Anda Pacific's Website;
- 8.1.6 to comply with our legal and regulatory obligations;

8.1.7 where we have a Legitimate Interest; and

8.1.8 to investigate or address claims or disputes relating to your use of the Website and/or the Services in accordance with Applicable Law.

8.2 If you have any questions or want more details about how we use your Personal Information, you can ask us via email at dpo@bluemeg.com.

9. LEGITIMATE INTEREST

9.1 In relation to Clause 10, our reasons for which we may use your Personal Information include where:

9.1.1 we have your consent – note that you can withdraw your consent at any time;

9.1.2 we are fulfilling a contract with you or your organisation;

9.1.3 we are under a legal duty to do so; and/or

9.1.4 we have a Legitimate Interest to do so.

9.2 For the purposes of this Privacy Notice, “**Legitimate Interest**” means where we believe that processing your Personal Information is necessary for:

9.2.1 keeping our records up to date;

9.2.2 working out which of our Services may interest you and telling you about them;

9.2.3 developing products and services, and what we charge for them;

9.2.4 defining types of customers for new products or services;

9.2.5 seeking your consent when we need it to contact you;

9.2.6 efficiently fulfilling our legal and/or contractual duties; and/or

9.2.7 complying with Applicable Law and rules and guidance from regulators.

10. DISCLOSURE OF YOUR DATA / INFORMATION

10.1 Anda Pacific may share / disclose your information with selected third parties and in certain circumstances, including:

10.1.1 people who Anda Pacific works with, including affiliates, employees, suppliers and sub-contractors to deliver the Services, and for the performance of any contract Anda Pacific enters into with you;

10.1.2 advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;

10.1.3 analytics and search engine providers that assist Anda Pacific in the improvement and optimisation of the Website;

10.1.4 where Anda Pacific sells or buys any business or assets, in which case we may disclose your information to the prospective seller or buyer of such business or assets, or their respective agents, advisors and auditors;

10.1.5 where Anda Pacific is under a duty to disclose or share your information in order to comply with Applicable Law, or any legal or regulatory obligation or order;

10.1.6 in order to enforce or apply any of Anda Pacific’s terms and conditions; and/or

10.1.7 to protect the rights, property or safety of any of Anda Pacific's employees or customers.

11. HOW WE PROTECT AND WHERE WE STORE YOUR PERSONAL DATA / INFORMATION

11.1 The information that we collect from you may be transferred to, and stored at, a destination outside of Singapore.

11.2 Your information may be processed by people outside of Singapore who work for Anda Pacific or for one of our suppliers, pursuant to a data processing agreement entered into with us, which is compliant with this Privacy Notice.

11.3 Such staff may be engaged in, among other things:

11.3.1 the provision of services; and/or

11.3.2 the processing of your payment details.

11.4 Unfortunately, the transmission of information via the internet is not completely secure and any transmission of data and/or information is at your own risk.

11.5 Anda Pacific will use reasonable efforts to ensure that your information is treated securely and in accordance with this Privacy Notice.

11.6 Notwithstanding Clause 11.5, Anda Pacific cannot guarantee the security of your information transmitted to the Website.

12. HOW LONG WE KEEP YOUR PERSONAL INFORMATION

12.1 We will keep your Personal Information for as long as you receive Services, or engage in discussions regarding the receipt of Services, from Anda Pacific or such other period as may be required by Applicable Law.

12.2 Subject to Applicable Law, we may keep your Personal Information after you cease to receive Services, or engage in discussions regarding the receipt of Services, from us for up to 6 years to:

12.2.1 meet record retention obligations under Applicable Law;

12.2.2 respond to any questions or complaints;

12.2.3 show that we treated you fairly; and/or

12.2.4 maintain records according to rules that apply to us.

12.3 Please be assured that we will only keep Personal Information that is strictly necessary for the purposes stipulated in Paragraph 12.2 above.

12.4 We may keep your Personal Information for longer than 6 years if we cannot delete it for legal, regulatory, or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure your privacy is protected and only use it for those purposes.

13. IF YOU CHOOSE NOT TO GIVE US PERSONAL INFORMATION

13.1 We may need to collect Personal Information as required by Applicable Law, or to enter into or fulfil a contract we have with you.

13.2 If you choose not to give us the Personal Information we ask for, it may:

13.2.1 delay or prevent us from fulfilling a contract we have with you;

13.2.2 delay or prevent us from doing what we must do by Applicable Law; and/or

13.2.3 mean that we cannot provide the services you are seeking.

13.3 We sometimes ask for information that is useful, but not required by Applicable Law or a contract. We will make this clear when we ask for it. You do not have to give us these extra details and it will not affect your access to the Services.

14. HOW TO GET A COPY OF YOUR PERSONAL INFORMATION

14.1 You can obtain a copy of your Personal Information that we hold by writing to us at dpo@bluemeg.com.

15. HOW TO CORRECT YOUR PERSONAL INFORMATION

15.1 You have the right to question any Personal Information that we have about you, which you think is wrong or incomplete. Please contact us at dpo@bluemeg.com, if you want to do this.

15.2 Where you submit a request pursuant to Clause 15.1, we will take reasonable steps to check the accuracy of your Personal Information and make any necessary corrections.

16. REQUESTING THAT WE CEASE USING YOUR PERSONAL INFORMATION

16.1 You have the right to object to our use of your Personal Information, or to ask us to delete, remove or stop using your Personal Information.

16.2 We want you to tell us if you think that we should not be using your Personal Information. But please note there may be legal or other official reasons why we need to still retain and/or use your Personal Information and that we reserve our rights as per Clause 12.

16.3 We may sometimes be able to restrict the use of your Personal Information. This means that the Personal Information would only be used for certain things, such as legal claims or to exercise legal rights.

16.4 Where Clause 16.3 applies, we would not use or share your Personal Information in other ways while it is restricted.

16.5 You can ask that we restrict the use of your Personal Information if:

16.5.1 it is not accurate;

16.5.2 it has been used unlawfully but you do not want us to delete it;

16.5.3 it is not relevant anymore, but you want us to keep it for use in legal claims; or

16.5.4 you have already asked us to stop using your Personal Information, but you are waiting for us to tell you if we are allowed to keep on using it.

16.6 We will usually inform you (before collecting your information) where we intend to:

16.6.1 use your data for marketing purposes; or

16.6.2 disclose your information to others for marketing purposes.

16.7 If you want to object to how we use your Personal Information or ask us to delete it or restrict how we use it, please contact us at dpo@bluemeg.com.

17. THIRD PARTY WEBSITES

- 17.1 The Website may, from time to time, contain links to and from third party websites.
- 17.2 If you follow a link to / from any third party websites, you do so at your own risk, and subject to whatever privacy policy / website terms that govern the use of such websites.
- 17.3 Anda Pacific does not accept responsibility or liability for the content of third party websites, or any information you provide to them.

18. CHANGES TO OUR PRIVACY NOTICE AND YOUR ACCEPTANCE

- 18.1 Any changes Anda Pacific may make to this Privacy Notice will be posted on this page. Please check back frequently to see any updates or changes.
- 18.2 Your continued use of the Website will confirm your understanding and acceptance of the practices detailed in this Privacy Notice and any changes made to it from time to time.

19. HOW TO WITHDRAW YOUR CONSENT

- 19.1 Please note that where You have provided Us with Your consent to process your Personal Information, You may withdraw it at any time. Please contact us if you wish to do so.

20. HOW TO COMPLAIN AND CONTACT US

- 20.1 Please let us know if you are unhappy with or have any questions as to how we have used your Personal Information. You can contact us at dpo@bluemeg.com.
- 20.2 You also have the right to complain to a relevant privacy regulator, and to potentially lodge an appeal if you are not happy with the outcome of a complaint. We hope that that will never be required though.
- 20.3 Any other questions, comments and requests regarding this Privacy Notice should also be sent to dpo@bluemeg.com.

21. DEFINITIONS

- 21.1 For the purposes of this Privacy Notice, the following terms shall have the following meanings:
 - 21.1.1 “**Applicable Law**” means all national, state, local, municipal legislation, regulations, statutes, by-laws, approvals and/or other laws and any other instrument having the force of law as may be issued and in force from time to time (and any amendment or subordinate provisions) relating to, or connected with, the activities contemplated under this Privacy Notice wherever so located or performed.
 - 21.1.2 “**Websites**” means the Anda Pacific websites, including <https://www.andapacific.net/>.
 - 21.1.3 “**Personal Information**” means data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, Anda Pacific’s possession.
 - 21.1.4 “**Privacy Notice**” means this privacy & cookie notice.
 - 21.1.5 “**Services**” means any services which we may choose to offer you (for sale or otherwise) on the Website, including facilitating the sale of any physical goods by any third parties.
 - 21.1.6 “**Usage Information**” means information about your use of the Website, including your device IP address, access dates and times, app features or pages viewed, application crashes and other system activity, type of browser, and the third party site or service you were using before interacting with the Website.