



BLOYALTY PTE LTD
PRIVACY & PERSONAL DATA PROTECTION POLICY
17 April 2019

Your privacy is important to us. This Data Protection Notice (this “Notice”) explains our policy on collecting, using and disclosing your Personal Information, including Personal Data. The processing of your Personal Data is also subject to applicable laws. The Personal Information which you provide to us now or from time to time or have provided to us previously will be used and processed, and continued to be used and processed by us, in accordance with this Notice (as amended, varied or revised from time to time). We will take reasonable care and precaution to prevent the loss or misuse of your Personal Information. We may amend, vary or revise this Notice from time to time, and the latest version of the Notice will prevail. If we amend, vary or revise this Notice, we will send you a Notification. We encourage you to review this Notice whenever you access our Website, B Infinite or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. Continued use of B Infinite or B Infinite Loyalty Programme card to participate in the Programme or use of the Platform will constitute acceptance by the Member will constitute acceptance of the revised Notice.

Definitions

In this Notice, unless the context otherwise requires, the following words and expressions shall have the following meanings:

- (a) “Account” means the account created for a Member when the Member registers for a Membership;
- (b) “B Infinite” means the mobile application used by Members to access the Programme;
- (c) “BLoyalty”, “BLoyalty Group”, “we”, “us” or “our” means BLoyalty Pte Ltd, BLoyalty Sdn Bhd and its affiliates;
- (d) “Member” or “Members” means individual(s) who has been accepted by BLoyalty as participating member(s) of the Programme;
- (e) “Membership” means membership to the Programme;
- (f) “Merchant” or “Merchants” means the participating merchant(s) of the Programme;
- (g) “Notification” means any notice or communication from BLoyalty to the Members in relation to the Programme that may be made via any of the following methods at BLoyalty’s discretion: (i) by posting on the Website; (ii) by notifications via B Infinite; (iii) by SMS to the Member’s mobile phone registered with BLoyalty; (iv) by email to the Member’s email address registered with BLoyalty; (v) by publication in a newspaper; or (vi) by ordinary post to the Member’s address registered with BLoyalty.
- (h) “PDPA” means the Singapore Personal Data Protection Act (No. 26 of 2012);
- (i) “Personal Data” has the meaning ascribed to it in the PDPA;
- (j) “Personal Information” means any information in our possession or control that relates directly or indirectly to you, including but not limited to Personal Data;
- (k) “Platform” means B Infinite, the Website or such other platform as may be stipulated by BLoyalty from time to time;



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- (l) "Points" means the Points awarded to Members for purchases and redemption of Rewards at participating Merchants' outlets;
- (m) "Programme" means the B Infinite Loyalty Programme operated by B Loyalty in Malaysia and Singapore;
- (n) "Rewards" means the products, services, rewards, gifts or other benefits made available by B Loyalty under a rewards programme established by B Loyalty which may be redeemed by Members;
- (o) "Services" mean the services relating to the Programme provided by B Loyalty through the Platform;
- (p) "Website" means the website owned and operated by B Loyalty in relation to the Programme and located at www.binfinite.com.my, www.binfinite.com.sg or at such other domain name registered by B Loyalty.

1. Personal Information

1.1. What we collect from you

Personal Information we collect about you, include but is not limited, to the following:-

- (a) personal details such as name, gender, nationality, date of birth, address, telephone number, email address and other details you provide when you apply to be a Member of the Programme, including but not limited to your username, password and such other identifiers;
- (b) information in connection with products and services you have purchased from Merchants or have registered your interest with us for purchase, information, updates, inquiries, etc;
- (c) other information that are, have been or may be collected by us or Merchants, or which you provide to us or Merchants from time to time, in connection with any service, transaction, contest, survey, promotion, questionnaire or communication with us relating to the Programme or otherwise;
- (d) personal interests or preferences such as language, product or content interests, communicating and marketing preferences;
- (e) transaction data, device information, location information, and such other information that is logged when you use the Platform;



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- (f) Cookies and URL information to gather information regarding the date and time of your visit and the information for which you searched and viewed. “Cookies” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Platform. Persistent Cookies can be removed by following web browser’s directions; and
- (g) Information about how you use and interact with the Programme, whether via B Infinite or the Website, via third party analytics services such as Google Analytics (<https://www.google.com/analytics>) or Google AdSense (<https://www.google.com/adsense>). Such third party analytics services may use Cookies to gather information such as the pages you visited, your IP address, a date/time stamp for your visit and the sites that redirected you to the Website.

Certain information requested by us are mandatory which you must provide and agree to the processing of such mandatory information by us, failing which, we will not be able to approve or continue your Membership with the Programme or provide you information, updates, products or services you requested or relating to the Programme.

1.2. How your Personal Information is collected

- (a) when you apply to be a Member of the Programme or register your interest with us to obtain information and updates on any products and services;
- (b) when you use the Platform or visit our social networking sites;
- (c) when you enter contests or respond to surveys, promotions or questionnaires;
- (d) from our Merchants;
- (e) when you make any transaction at any of Merchants’ outlet; and
- (f) pursuant to any transaction or inquiry or communication made with or to us.

1.3. Purpose of collecting and processing your Personal Information

- (a) to communicate with you;
- (b) to process your application, inquiry or request;



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- (c) to provide the products and services relating to the Programme or such other goods and services you requested;
- (d) for administration of the Programme;
- (e) to respond to your queries;
- (f) to conduct surveys, research and statistical analysis;
- (g) to help us monitor and improve our services;
- (h) to comply with applicable laws, proceedings or inquiries from regulatory authorities, and enforcement agencies;
- (i) any other purposes permitted by applicable laws;
- (j) to market and promote other products and services that are or may be offered by us, our partners, Merchants or sponsors from time to time (Subject to your consent);
- (k) for direct marketing purposes (Subject to your consent); or
- (l) to provide you with information and updates on the Programme or products and services requested.

We will retain your Personal Information for as long as you are a member of the Programme. Upon the termination of your membership, we will continue to retain your Personal Information for a period of up to seven (7) years thereafter in order to comply with our legal obligations relating to the retention of records. Upon the cessation of our legal obligations, we will anonymise our records by removing your Personal Information and retain such anonymized records indefinitely for marketing analysis purposes to improve our Programme for the benefit of our Members and Merchants.

2. Disclosure

2.1. To facilitate the purposes above and the provision of products and services to you, we may process, use and disclose your Personal Information within the BLOYALTY Group and to the following classes of third parties in or outside of Singapore: -

- (a) regulatory authorities and enforcement agencies;
- (b) any court of law or any relevant party in connection with any claim or legal proceedings;



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- (c) our contractors, service providers, consultants, auditors and advisors on a need to know basis;
- (d) our Merchants, partners and sponsors; and
- (e) any actual or potential assignee, transferee or acquirer of our company or business.

2.2. We do not share your Personal Information with advertisers, but we do, however, allow advertisers to request that their advertisements are directed at certain users (e.g., users in a certain geographic location, or age, gender and/or with certain interests). In the event that you interact with certain advertisements, the advertisers (or the company which the advertiser works with, for example, its advertising agency or an advertising network) may determine certain characteristics about you.

3. **Third Party Websites**

The Platform may contain links to third party websites. We make no representations as to the quality, suitability, functionality or legality of the material on third party websites that are linked to, or to any goods and services available from such websites. The material is only provided for your interest and convenience. We do not monitor or investigate such third party websites and we accept no responsibility or liability for any loss arising from the content or accuracy of this material and any opinion expressed in the material should not be taken as an endorsement, recommendation or opinion of BLOYALTY. This Notice does not extend to your use of such third party websites. You are advised to read the privacy policy or statement of such third party websites prior to using them.

4. **Social Network Sites**

In your use of the Services, you will also be able to connect your Account with third party services including Social Network Sites ("SNS"). By logging-in to your SNS from our Platform, your SNS will provide us a token that allows them to recognize us when we ask, on your behalf, for access to your account information or to post information on your SNS profile. You will be able to revoke our access to any of your SNS at any time by amending the appropriate settings from within your account settings on your applicable SNS, though such revocation may limit the Services we are able to provide you. In addition, when you engage in certain activities within the Services, those activities may be automatically posted to your SNS profile. You will be able to disable this functionality at any time by logging into your SNS profile and selecting the option to disable this feature.

5. **Transfer of Personal Information outside the Country where it is Collected**

BLOYALTY operates the Programme in various countries, namely, Malaysia and Singapore. Your Personal Information may be transferred to and stored in a country outside the country where it is



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collected. You hereby consent to us transferring your Personal Information outside of the country it is collected, including to the class of third parties set out above at **Section 2** above. If we transfer Personal Data collected in Singapore to a country outside of Singapore, we will take all reasonable steps to ensure that your Personal Data is stored in a manner which affords a standard of protection which is similar or equivalent to the standard required by the PDPA.

6. Access or Update your Personal Information

6.1. You are responsible for providing accurate and complete information about yourself and any other person whose personal information you provide us (for e.g., your spouse, children, relatives or third parties), and as such, as and when such information becomes incorrect or outdated you should correct or update such information by contacting us or submitting fresh information. If you provide any Personal Information regarding third parties, you represent and warrant to us that you have obtained their consent to disclose such Personal Information to us.

6.2. You may, by writing to us at the address set out in Section 8 below:

- (a) request for a copy of the Personal Information we hold about you; or
- (b) request to rectify or update your Personal Information.

Please provide proof of your identity, address and sufficient information to enable us to identify you when submitting your request to us.

6.3. On receipt of your written request, we will endeavour to process your request within 1 month. After processing your request, we may:

- (a) comply or refuse your request to access or rectify your Personal Information. If we refuse, we will notify you the reasons for such refusal;
- (b) charge a fee for processing your request for access or rectification.

7. Limit the process of your Personal Information

7.1. By giving or making available your Personal Information to us, participating in the Programme or using the Platform, you expressly agree and consent to the use and process of your Personal Information in accordance to this Notice, including but not limited to, consenting to receiving communications from us from time to time.

7.2. If you would like use to cease processing your Personal Information for a specified purpose or in a specified manner, please notify us in writing to the address set out in **Section 8** below. In the absence of such written notification from you, we will deem it that you consent to the processing,



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usage and dissemination of your Personal Information in the manner, to the extent and within the scope of this Notice. If you do not consent to the processing of your Personal Information as above, we may not be able to approve or continue your Membership with the Programme or provide you information, updates, products or services you requested or relating to the Programme. If you wish to terminate your Account, please notify us in writing to the address set out in **Section 8** below. However, please note that we will retain your Personal Data as long as it is necessary for our compliance with any governmental regulations and legal obligations.

8. How to Contact Us

8.1. Write in to us at:

BLOYALTY Private Limited
133 Cecil Street
#17-01B Keck Seng Tower
Singapore 069535

Email: customerservice@binfinite.com.sg