

Global Privacy Policy

PART B – JURISDICTIONAL REQUIREMENTS

For Those in Singapore

This addendum (“Addendum”) applies to our collection, use and/or disclosure of personal data in Singapore. Any personal data collected, used or disclosed by us in accordance with the Policy shall be subject to the Personal Data Protection Act 2012 of Singapore (“PDPA”). For the purpose of this Addendum, “personal data” means any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which any of the Parties has or is likely to have access, and such other data which is deemed as personal data under the applicable personal data laws.

1. Collection, Use and Disclosure of Personal Data

We will not collect your personal data unless (a) it is provided to us voluntarily by you directly after (i) you have been notified of the purposes for which the personal data is collected (as set out under Section 3 (Purposes of Processing Personal Data) of the Policy), and (ii) you have provided written consent to the collection, use and/or disclosure of your personal data for such purposes; or (b) the collection, use and/or disclosure of personal data without consent is permitted or required by the PDPA or other applicable laws.

Notwithstanding the above, you may choose to exercise any of your rights set out in Section 6 (Your Rights) of the Policy. For the avoidance of doubt, if we refuse to grant you access to your personal data pursuant to the exercise of your rights set out in Section 6 (Your Rights) of the Policy, we will preserve a complete and accurate copy of the personal data for a period of 30 days after the date on which we notify you of our refusal to do so.

2. Transfer Overseas

We may transfer your information to the types of entities described in Section 4 (Disclosure of Personal Data to Recipients and Joint Use of Personal Data) of the Policy, which may be located in Japan. We will only transfer your information overseas in accordance with the PDPA and will ensure that the entities described in Section 4 (Disclosure of Personal Data to Recipients and Joint Use of Personal Data) of the Policy will be obliged to provide a standard of protection comparable to the protection under the PDPA.

3. Retention of Personal Data

We will retain your personal data collected by us in accordance with Section 5 (Storage Period for Personal Data) of the Policy and in any case, for only as long as:

- (a) the retention of your personal data continues to serve the purposes for which the personal data is collected (as set out under Section 3 (Purposes of Processing Personal Data) of the Policy); and
- (b) the retention of your personal data is necessary for our business or legal purposes.

In the event that the retention of your personal data is no longer necessary for any business or legal purposes or when the purpose for which your personal data was collected is no longer being served by the retention of your personal data, we will remove, destroy or anonymise your personal data.

We will further undertake reasonable measures to prevent (a) the unauthorized access, collection, use, disclosure, copying, modification or disposal of your personal data and (b) the loss of any storage medium or device on which your personal data is stored.

4. Breach of Personal Data

In the event of a data breach affecting your personal data (“Breach”), we will promptly conduct an assessment of whether the Breach is notifiable to the Personal Data Protection Commission (“PDPC”) in accordance with the PDPA. If the Breach is notifiable to the PDPC, we will also notify you of the occurrence of the Breach as soon as practicable in accordance with the PDPA.

Effective Date: June 1, 2024