

# PRIVACY POLICY

This Privacy Policy applies to the services offered by Flow Fitness. We encourage you to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

We may update this Privacy Policy from time to time. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time. We encourage you to check the latest version of this Privacy Policy regularly.

"Personal Data" refers to data, whether true or not, about an individual who can be identified from that data, or from that data in combination with other information to which the organisation may have access and includes the meaning otherwise as defined in the Act as amended from time to time.

By signing up for or using any products, services or campaigns offered by Flow Fitness or submitting information to or otherwise communicating with Flow Fitness, you agree and consent to Flow Fitness and our related entities, affiliates and subsidiaries (individually and collectively, "Companies"), as well as their respective representatives and/or agents (collectively referred to herein as "Flow Fitness", "us", "we" or "our") collecting, using and disclosing your Personal Data in accordance with this Privacy Policy. "You" or "your" means any individual to whom the Act applies and includes an individual actual or prospective customer but excludes any corporate entity (including corporate customers) and any other entity that is excluded under the Act.

This Privacy Policy does not supersede or replace any other consents you may have previously or separately provided to us in respect of your Personal Data, and your consent to this Privacy Policy is in addition to any other rights which any of the Companies may have at law to collect, use or disclose your Personal Data.

This Privacy Policy and your use of this website shall be governed in all respects by the laws of Singapore.

## 1. Collection & Consent

- a. Personal Data may be collected from you in one or more of the following ways:
  - when you order or purchase products or services from us;
  - when you use some of our services including establishing any online accounts with us;
  - when you request that we contact you, be included in an email or other mailing list;
  - when you respond to our promotions, campaigns or other initiatives or attend our events;
  - when we receive references from business partners and third parties, for example, where you have been referred by them;
  - when you visit our websites;
  - when you take part in any contest, survey or promotion conducted by us and/or our business partners (including submission of photographs);
  - when we receive information about you from third party social networking services when you choose to connect with those services;
  - when you provide or contemplate providing security to us for a transaction;
  - when you submit your Personal Data to us for any other reasons; and/or
  - when we collect your Personal Data by other lawful means.
- b. Unless permitted by applicable laws, we will not collect Personal Data without your consent.
- c. You warrant and represent to us that (i) Personal Data which you disclose to us is accurate and complete; and (ii) where you volunteer Personal Data of another person to us, that you are authorized by such other person to disclose such Personal Data to us, and that such Personal Data is accurate and complete.
- d. You shall consult your parent or guardian before giving us your Personal Data if you are under the age of eighteen.

## 2. Purposes for which we collect, use and disclose your Personal Data

- a. For the purpose of carrying on the Company's business, including registration and administration of the Company's related products and services (including relevant online services), you may be requested to provide personal data such as, but not limited to, the following, without which it may not be possible to satisfy your request (i) Your name (ii) Contact details, including contact name and telephone number or email address (iii) Billing and Payment Information (iv) Other information about your use of products, services, websites (v) Your image taken at our premises with via webcam (or like equipment) for visual identification
- b. Flow Fitness may employ other companies or individuals to assist us in providing our services, or to provide certain services such as analysing customer lists, providing marketing assistance or consulting services. These third parties may have access to information needed to perform their function but cannot use that information for other purposes. In some instances, you may also be requested to provide certain data that may be used to further improve our products and services and/or better tailor the type of information presented to you. This type of data includes, but is not limited to: (i) Your age; (ii) Gender; (iii) Salary range and employment details; (iv) Education and Profession; (v) Hobbies and leisure activities; (vi) Other related products and services subscribed to; and (vi) Family and household demographics.
- c. Some of the Company's Websites may place a "cookie" on your machine; for example to provide personalised services and/or maintain your identity across multiple pages within or access one or more sessions. This information may include, but is not limited to, relevant login and authentication details

as well as information relating to your activities and preferences across our Websites.

- d. If you have provided us with your telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your telephone number(s), then from time to time, we may contact you using such telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services.
- e. Additionally Flow Fitness may, in the following situations, collect, use or disclose Personal Information without your consent:
  - The Personal Information is generally available to the public.
  - The Personal Information is necessary to render a service that the individual has applied for.
  - The Personal Information is required by law.
  - The Personal Information is for research or statistical purposes, and that the results of the research or statistical processing would lead to an aggregate or de-identified Personal Information and would not lead to identification of an individual by any reasonably foreseeable means.
  - The collection, use or disclosure of Personal Information is clearly in the individual's interest.
  - It is impracticable to obtain the individual's consent at the point of collection, use or disclosure, and if it were practicable for the individual to grant such consent, the individual would be likely to give it.
  - Legal, medical, or security reasons make it impossible or impractical for Flow Fitness to seek the individual's consent.
  - In an emergency that threatens the life, health or security of the individual or community.
- f. Your Personal Data may be transferred, stored and/or processed in a country or territory outside Singapore and you consent to any such transfer, storage and/or processing of your Personal Data outside Singapore. We will however ensure that any party to whom we transfer your Personal Data outside Singapore provides to such Personal Data a standard of protection at least comparable to the protection under the Act. This includes without limitation ensuring that any party coming into contact with the Personal Data outside Singapore:
  - complies with the Act and accompanying guidelines issued by the relevant regulatory authorities, all applicable laws and regulations and this Privacy Policy ("Data Standards") and shall not do or permit anything to be done which might cause such party or us to breach the Data Standards;
  - takes all appropriate measures to ensure such compliance by implementing such Data Handling Principles as notified by us to them from time to time and appropriate technical and organisational measures and providing a standard of protection for the Personal Data that is comparable to the protection under the Act; and
  - protects the Personal Data by making reasonable security arrangements to prevent unauthorised access, use, disclosure or modification.
3. Withdrawal of Consent & Access
  - a. You may, at any time, requests details of their Personal Information that Flow Fitness has collected from you, or information relating to Flow Fitness' use and disclosure of his Personal Information.
  - b. Flow Fitness has the discretion to decide whether to provide the requested information and the terms on which the said information is provided to you. Flow Fitness has the discretion to refuse to provide the requested information in the following situations:
    - Information requested would reveal Personal Information that cannot be disclosed by Flow Fitness on the grounds of public policy, legal, security or commercial proprietary reasons;
    - The request would be too costly for Flow Fitness to comply with; or
    - The request is frivolous or vexatious.
  - c. If you would like a copy of your personal data being held by Flow Fitness, please contact our Data Protection Officer, at the contact particulars set out below. The following administrative charges shall be applicable:
    - If you are requesting for information on your personal data held by Flow Fitness, the fees chargeable for the request is S\$ 80.00;
    - If you are requesting for information on your personal data by Flow Fitness as well as a copy of such data, the fees chargeable for the request is S\$ 160.00.
  - d. We will, at your request, endeavour to provide you with an account of your Personal Data in our possession or control within a reasonable time.
4. Disclosure of Personal Data
  - a. All personal data held by the Company will be kept confidential but the Company may, where such disclosure is necessary to satisfy the purpose, or a directly related purpose, for which the data was collected provided such information to the following parties:
    - b. Any subsidiaries, holding companies, associated companies, or affiliates of, or companies controlled by, or under common control with the Company;
    - c. Any person or company who is acting for or behalf of the Company, or jointly with the Company, in respect of the purpose or a directly related purpose for which the data was provided;
    - d. Any other person or company who is under a duty of confidentiality to the Company and has undertaken to keep such information confidential, provided such person or company has a legitimate right to such information; and
    - e. Any financial institutions, charge or credit card issuing companies, credit information or reference bureaux, or collection agencies necessary to establish and support the payment of any services being requested. Personal data may also be disclosed to any person or persons that have a

right under Singapore law to gain access to such information provided they are able to prove their authority to access such information. For example, if the Company were served with a court order demanding certain customer information then the Company would disclose the information to the duly appointed officer of the court or such persons as the court orders.

## 5. Accuracy & Correction

- a. We will endeavour to ensure that your Personal Data we use is sufficiently accurate and complete in making any decision that impacts you.
  - b. To help us maintain the accuracy of your Personal Data, we encourage you to inform us when there are any changes to your Personal Data which you have provided us by writing. We will correct or complete your Personal Data as soon as reasonably practicable.
- ## 6. Protection, Policies and Procedures
- a. We will endeavour to protect your Personal Data in our possession or control against risks of unauthorised access, collection, use, disclosure, copying, modification, disposal or destruction, through reasonable and appropriate security measures. We strive to ensure that our systems are secure and that they meet industry standards. To prevent unauthorized access, maintain data accuracy and ensure the correct use of information, we have put in place appropriate physical, electronic, and managerial procedures to safeguard and secure the Personal Data we collect. Notwithstanding our security measures for protecting your Personal Data, you acknowledge that no data transmission over the Internet is completely secure and by providing your Personal Data, you are transmitting information at your own risk.

## 7. Storage & Retention of Personal Data

- a. Flow Fitness will endeavor to take all reasonable steps to keep secure and personal information recorded, and to keep this information accurate and up to date. The information is stored on secure servers if in digital format, or in locked areas if in hardcopy format: these repositories are protected in controlled facilities. In some cases these facilities may be overseas. Flow Fitness employees and data processors are obliged to respect the confidentiality of any personal information held by Flow Fitness. However, security of communications over the Internet cannot be guaranteed, and therefore absolute assurance that information will be secure at all times cannot be given. Flow Fitness will not be held responsible for events arising from unauthorized access to personal information.
- b. The Company will destroy and personal data it may hold in accordance with our internal retention policy. The policy states that:
  - Personal data will only be retained for a long as is necessary to fulfill the original or directly related purpose for which it was collected, unless the personal data is also retained to satisfy any applicable statutory or contractual obligations; and
  - Personal data are purged from the Company's electronic, manual, and other filing systems in accordance with specific schedules based on the above criteria and the Company's internal procedures.
8. Cookies
  - a. We gather information on our website activity, such as data on the number of visitors, the pages they visit, the duration of their stay, etc. Such information is collected on an aggregate, anonymous basis, which means no Personal Data is associated with this data and gathered through the use of web server logs and cookies. We do not at our website automatically collect Personal Data unless you provide such information or login with your account credentials.
  - b. Cookies are small bits of data automatically stored in the hard drive of the end user and are commonly used to track preferences in relation to the subject of such website. If you enable these cookies, then your web browser adds the text in a small file. You may wish to set your web browser to notify you of a cookie placement request or refuse to accept cookies by modifying relevant internet options or browsing preferences of your computer system, but to do so you may not be able to utilize or activate certain available functions on our website.
  - c. By accessing and using our website and services, you consent to the storage of cookies, other local storage technologies, beacons and other information on your devices. You also consent to the access of such cookies, local storage technologies, beacons and information by us or our representatives or agents.
9. Third-Party Links and Products on Our Services
  - a. Our website and/or services may link to third-party websites and services that are outside our control. For example, we may enable you to share certain materials on the services with others through social networking services such as Facebook, Twitter, and Instagram. We are not responsible for the security or privacy of any information collected by websites or other services. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use. To the fullest extent permitted under laws, we cannot be responsible for a third party's acts, omissions, data policies or their use of cookies nor the content or security of any third party websites, even if linked to our website. Any such liability is expressly disclaimed and excluded.
10. Contact us
  - a. Should you have any query, request or feedback relating to your Personal Data, please contact us at the following email: [DPO@flowfitness.org](mailto:DPO@flowfitness.org) (Data Protection Officer)