



## **Privacy Policy - HiLife Smart Community Solution**

Website and Mobile Application

Updated: 13<sup>th</sup> November 2020

This Privacy Policy describes how Hilife Interactive Pte Ltd and its holding company or companies, subsidiaries and subsidiaries of its holding company or companies (collectively “HiLife”, “we”, “us”, “our”) handle your personal data.

### **1. Protecting you**

The HiLife website [www.hilife.sg](http://www.hilife.sg) (“Website”) and HiLife mobile application (“App”) are owned and operated by Hilife. This Policy applies to you if you browse, access or use this Website, or download, install or using this App. Where this Policy uses a word starting with a capital letter which is not otherwise defined, that word will have the same meaning as used in the terms and conditions of the Website and/or App.

This Policy explains what personal data we collect, how we use and/or share this personal data, and how such personal data is maintained by us. By browsing, accessing or using this Website, or by downloading, installing or using this App, you signify your acceptance of this Policy. If you do not agree to the terms of this Policy, whether in whole or part, you should not apply to use or use this Website or App.

Please read this Privacy Policy carefully and check back periodically as we update it from time to time. Each time you use the App and/or Website, you signify your agreement to the latest version of this Privacy Policy that is in force.

### **2. How to contact us**

If you have any concerns or questions regarding this Policy or if you wish to made a request to HiLife to access to or correction of your personal data, please do not hesitate to contact us at:

HiLife Interactive Pte Ltd  
c/o Group Legal & Corporate Compliance  
111 Somerset Road  
#05-05  
Singapore 238164  
Email: [enquiries@hilife.sg](mailto:enquiries@hilife.sg)

### **3. What personal data we collect**

Personal data means any data about an individual who can be identified from that data. It includes without limitation an individual’s name, identity card, passport or other identification number, telephone numbers, address and email address.

We collect personal data that is volunteered by you when you use this Website or App, such as when you apply for a User Account or respond to specific information requests explicitly presented to you by HiLife.



Depending on what you use this Website or App for, HiLife may require additional information, such as billing information, including details of your chosen payment mechanism, such as credit card details).

HiLife automatically receives and records some information from your browser or mobile phone when you visit or use this Website or App, such as your IP (Internet Protocol) address, cookies and data about which pages you visit on the site through the use of log files provided by our third-party tracking-utility partners. This information helps us analyze and understand how the site works for our customers. We may also collect your IP address to help diagnose problems with our server, and to administer this Website or App. An IP address is a number that is assigned to your computer when you use the Internet. Your IP address is also used to help identify you during a particular session and to gather broad demographic data.

If you connect to or register for a User Account for this Website or App by using an external third-party application, such as Facebook, or an app developed using the HiLife API, HiLife may receive some data from those connected third-party applications. Connecting your HiLife account to third-party applications or services is optional. You can revoke your permission to connect your account to the external app by changing your HiLife account settings.

HiLife may also collect personal data from you by the following means:

- From application or registration forms or other similar forms submitted to HiLife;
- From publicly available sources such as telephone directories;
- From HiLife's social media pages, if you follow, like or are a fan of such pages;
- From credit reporting agencies;
- When you interact and communicate with HiLife at any events or activities;
- When you enter contests organized by HiLife;
- From various entities or divisions under HiLife;
- From your use of other websites operated by HiLife; and
- From cookies used on our websites.

#### 4. How we use personal data

We will use the personal data that we collect about you lawfully (in accordance with the Data Protection Act 2012 (the "**Applicable Law**")).

HiLife uses personal data collected from you for the business and activities of HiLife which shall include without limitation, the following:

- for identification and authentication purposes;
- to perform the HiLife's obligations in respect of any contract entered into with you;
- to provide you with any service you have requested;
- where you have requested to download and use the App to process your request, to deliver the App to you and to provide you a license for the use of the App;
- to process your participation in any events, activities, focus groups, research studies, contests, promotions, polls, surveys or any productions and to communicate with you regarding your

- attendance thereto;
- to process, manage or verify your application for a User Account and to provide you the benefits offered to User Account holders;
  - to validate your bookings and process payments for products or services you have requested;
  - to understand and analyze our sales as well as your needs and preferences;
  - to develop, enhance and provide products and services to meet your needs;
  - to facilitate or enable any checks as may be required pursuant to the Terms of Use;
  - to respond to questions, comments and feedback from you;
  - where you are a User Account holder or where you have requested for it, to send you alerts, newsletters, updates, mailers, promotional materials and notices of special privileges and festive greetings from HiLife, its partners, advertisers and/or sponsors;
  - where you are a User Account holder or where you have requested for it, to notify and invite you to events or activities organized by HiLife, its partners, advertisers, and/or sponsors;
  - to respond to questions, comments and feedback from you;
  - to communicate with you for any of the purposes listed in this Policy;
  - for internal administrative purposes, such as auditing, data analysis, database records and reporting purposes within the HiLife group of companies;
  - for purposes of detection, prevention and prosecution of crime;
  - for HiLife to comply with its obligations under the Applicable Law;
  - to respond to governmental enquiries (or enquiries from a legal, governmental or quasi-governmental or local authority agency or Internet protection agency of any type);
  - to comply with a valid legal process or procedure; and
  - to protect our rights or property, this Website or App, and/or other users of this Website or App.

HiLife may also collect, use and disclose your personal data for any other purpose which is permitted or required under the Applicable Law.

## 5. Choice & control over your personal data

HiLife provides you with the means to access, update, edit or delete certain personal data related to your User Account. You can change or delete such data as desired in your User Account settings.

You may also request for access to and/or correction of your personal data by contacting us at any time. HiLife reserves the right to impose a fee for such access of your personal data in such amounts as permitted by Applicable Law.

In respect of your right to access and/or correct your personal data, HiLife has the right to refuse your requests to access and/or make any correction to your personal data if permitted or required to under the Applicable Law.

If you have optionally connected your account to an external, third-party application, such as Facebook, or an app developed using the HiLife API, you can remove permission for such connection by changing your account settings. If you do not wish for your personal data to be collected via cookies on our websites, you may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies,

by deleting your browsing history and clearing the cache from your internet browser.

You may also request HiLife to limit the purposes of use of your personal data and/or stop using your personal data for any purpose. However, please recognize that if you do not permit us to use the personal data we require, it may not be possible for us to work with you or provide you with the products, services or information that you want.

If you no longer wish to use HiLife's services or receive service-related messages, then you may close your User Account. If you want to close your User Account, please contact us. While we are ready to assist you in closing your User Account and removing your active profile, we may not always be able to delete records of past interactions and transactions. For example, we are required to retain records relating to previous bookings and purchases for financial reporting and other compliance reasons.

## 6. Messages from HiLife

On occasion, HiLife will send you messages. The default required form of communication is email or mobile notifications via the App. If you sign up for SMS notifications, HiLife may also contact you by text message when applicable.

Some messages from HiLife are service-related and required for holders of User Accounts. Examples of service-related messages include, but are not limited to: a welcome/confirmation email when you register your User Account, notification of offers or sales, or correspondence with HiLife's support team. These messages are not promotional in nature as they are part of the services provided to User Account holders. You may not opt-out of receiving such service-related messages from HiLife, unless you close your User Account.

As a User Account holder, HiLife may also send you messages related to certain features on the Website, App or your activity. HiLife may also send you news or updates about changes to the Website, App or our services. By default, you will receive these messages via email, but you may choose to opt-out of getting certain emails under your User Account settings.

HiLife offers optional email newsletters. You must opt-in or subscribe to begin receiving newsletters. If you are a User Account holder, you may subscribe or unsubscribe from optional newsletters under your User Account settings or by following the instructions contained in the newsletter emails. If you do not hold a User Account, you may subscribe by providing an email address, which will only be used by HiLife for these newsletters, and you may unsubscribe from newsletters by following the instructions contained in the newsletter emails.

User Account holders may share with their friends' links to the Website or App using a convenient "Email" feature on certain pages. If you choose to use this share by email or text feature, HiLife will ask for the information needed to send the message, such as your friend's email address or mobile phone number. HiLife will then automatically send your friend an email message, inviting your friend to visit the site. We won't use your friend's email address or mobile phone number for any other purpose. Your friend may opt-out of receiving future similar sharing emails from HiLife by following the instructions in the email.

A contact-importer feature, if available, helps User Account holders locate and connect with their friends and contacts who may also hold User Accounts with HiLife. If someone in your contact list is not already a User Account holder, you may invite them to register for a User Account. You may preview the invitation before HiLife generates and sends it. Recipients of invitations may opt out of receiving future invitations by following instructions in the invitation message.

If you provide HiLife with the personal data of a friend, contact or any other individual, you must ensure, and HiLife will assume that you have taken all necessary steps to ensure, that you have informed him/her of the purpose for which you are disclosing his/her personal data to HiLife and that he/she has consented to such disclosure and to receive communications from HiLife.

## 7. Market research

Occasionally, we ask our customers to complete market research surveys. Survey results are aggregated and shared with our advertisers, sponsors and affiliates in a manner that does not disclose personal data.

## 8. Sharing & disclosure of personal data

A variety of third party merchants may offer promotions or sell products or services to you through this Website or App. HiLife may work with such merchants to offer you the chance of purchase vouchers for their products and services on this Website or App. Due to the nature of our business model, if you purchase a voucher or otherwise enter into a transaction with the merchant through this Website or App, we may share information that is related to such transaction with the merchant in order for it to provide you with the products or services that you have requested for, or in order to achieve any of the other purposes set out in this Policy. HiLife may also share aggregated demographic information with such merchants, who are our business partners.

HiLife may release your personal data to a third-party in order to comply with a subpoena or other similar legal procedure, or when we believe in good faith that such disclosure is necessary to comply with the Applicable Law; prevent imminent physical harm or financial loss; or investigate or take action regarding illegal activities, suspected fraud, or violations of HiLife's Terms of Use. We may disclose personal data to third parties, as we in our sole discretion believe necessary or appropriate, in connection with an investigation of fraud, intellectual property infringement, piracy, or other unlawful activity. In such events, HiLife may disclose name, address, country, phone number, email address and company name.

HiLife employs agents, subcontractors, service providers to perform tasks on our behalf, and we need to share your personal data with them to provide products and services to you or to otherwise achieve any of the other purposes set out in this Policy. Examples include but are not limited to fulfilling orders, processing payments, handling billing disputes and collections, analyzing data, providing marketing assistance and providing customer service. We may therefore share your personal data with such third parties. However, it is our policy not to sell or pass any personal data to any organizations outside HiLife **for their marketing purposes without your consent.**

HiLife may partner with third-party services for fraud prevention and/or identity verification.

When you load a page on HiLife that has a social plug-in from a third-party site or service, such as a Like or Send button, you are also loading content from that third-party site. That site may request cookies directly from your browser. These interactions are subject to the privacy policy of the third-party site.

The third parties referred to above include without limitation:

- HiLife's partners, which include parties with whom HiLife collaborates with for certain events, programs and activities;
- Merchants providing goods and services on the Website or the App;
- Event management companies and event sponsors;
- Marketing research companies;
- Service providers, including, information technology (IT) service providers for infrastructure, software and development work;
- Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- Other entities within HiLife; and
- Government authorities to comply with statutory, regulatory and governmental requirements.

We can only speak for ourselves; this Policy does not apply to the practices of third parties that HiLife does not own or control, or individuals that HiLife does not employ or manage. If you provide your information to others on the Website or App or throughout the Internet, different rules may apply to the use or disclosure of the information you provide to them. HiLife does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. HiLife is not responsible for the privacy or security practices of other websites on the Internet, even those linked to or from the HiLife site. We encourage you to ask questions before you disclose your personal data to others.

Please note that as part of any personal data sharing which we list above, your personal data may be transferred to, stored, used and processed in a jurisdiction outside Singapore in order to achieve any of the purposes set out in this Policy. The terms of this Policy will continue to apply the personal data so transferred. You consent to the transfer of your personal data outside Singapore on these terms.

## 9. Cookies & tracking technologies

HiLife uses a variety of technologies to help us better understand how people use our site and services.

A cookie is a small data file sent from a web site to your browser that is stored on your computer's hard drive. HiLife uses cookies for a number of purposes, including to access your information when you sign in; keep track of preferences you specify; display the most appropriate content based on your interests and activity on HiLife; estimate and report HiLife's total audience size and traffic; conduct research to improve our content and services.

You can configure your browser's settings to reflect your preference to accept or reject cookies. If you reject all cookies, you will not be able to take full advantage of HiLife's services.

We employ a software technology that to help us better manage content on our site by informing us what content is effective. The technologies are tiny graphics with a unique identifier similar in function to cookies, and are used to track the online movements of web users. In contrast to cookies, which are stored on a user's computer hard drive, clear gifs are embedded invisibly on web pages and are about the size of the period at the end of this sentence. We do not tie the information gathered by clear gifs to your personal data.

We use Flash cookies (a.k.a local shared objects or LSOs) to store some of your viewing preferences on our site. Flash cookies are used to collect and store information, but differ from browser cookies in the amount, type and manner in which data is stored. HiLife does not tie the information gathered by Flash cookies to your personal data.

HiLife may partner with third-party services who may use various tracking technologies, such as browser cookies or Flash cookies, to provide certain services or features. These technologies allow a partner to recognize your computer each time you visit HiLife, but do not allow access to personal data from HiLife. HiLife does not have access or control over these third-party technologies, and they are not covered by our privacy statement.

## 10. Emails

Please note that we may email you for the following purposes:

- (a) as part of the Service.
- (b) after registration of your User Account, notifying you of your User Account details;
- (c) as reminder emails about the services we offer (particularly if you have not used them yet or not used them for a while);
- (d) to send you information or Vouchers which you have asked for;
- (e) as a newsletter;
- (f) as promotional emails; and
- (g) to offer related services to you from HiLife.

**However, in terms of any marketing or promotional emails we may send, we will always give you the chance to opt-out (or unsubscribe) from them in the future.**

## 11. Security and retention

The security of your personal data is important to us. Your HiLife account information is protected by a password. It is important that you protect against unauthorized access of your account and information by choosing your password carefully, and keeping your password and computer secure by signing out after using our services. HiLife encrypts sensitive information (such as credit card number) using secure socket layer technology (SSL). HiLife follows generally accepted industry standards to protect the personal data



submitted to us, both during transmission and once HiLife receives it. No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially acceptable means to protect your personal data, we cannot guarantee its absolute security. You undertake to treat your username, password and order details confidentially and not make it available to unauthorized third parties. We cannot assume any liability for misuse of your HiLife username, password or order details, except as stated in the Terms of Use.

HiLife will retain your information for as long as your account is active or as needed to provide you services. If you no longer want HiLife to use your information to provide you services, you may close your account. HiLife will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **12. No Spam, Spyware, or Virus**

Spam, spyware or virus is not allowed on the Website or App. Please set and maintain your communication preferences so that we send communications to you as you prefer. You are not licensed or otherwise allowed to add other users to your mailing list (email or physical mail) without their express consent. You should not send any messages which contain spam, spyware or virus via the Website or App. If you would like to report any suspicious message, please contact us.

## **13. Retention of personal data**

We will only keep your personal data for as long as we are either required to by law or as is relevant for the purposes for which it was collected.

## **14. HiLife's Right**

You acknowledge and agree that HiLife has the right to disclose your personal data to any legal, regulatory, governmental, tax, law enforcement or other authorities, if HiLife has reasonable grounds to believe that disclosure of your personal data is necessary for the purpose of meeting any obligations, requirements or arrangements, whether voluntary or mandatory, or for the purpose of cooperating with an order, an investigation and/or a request of any nature by such parties. To the extent permissible by the Applicable Law, you agree not to take any action and/or waive your rights to take any action against HiLife for the disclosure of your personal data in these circumstances.

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