



GMEDES Pte Ltd

PRIVACY POLICY

This policy sets out the basis which GMEDES Pte Ltd and its related corporations, affiliates, associated companies, together with our subsidiaries, our holding company, subsidiaries of our holding company from time to time, collectively called “**GMEDES**”, “**we**”, “**us**” or “**our**”) collects, uses, discloses or otherwise processes personal data from you. If you have any queries on this policy, please contact the persons identified at the end of this policy.

By interacting with us and submitting information to us, you agree and consent to GMEDES, as well as our authorized service providers and partners collecting, using and/or sharing your Personal Data in the manner set forth in this Privacy Policy.

This Privacy Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your Personal Data. We may from time to time update this Privacy Policy to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. As and when, the contents of the Privacy Policy are updated or amended, the changes will be uploaded into our website at www.gmedes.com. It is your duty to keep yourself updated as to the latest version of the Privacy Policy.

Through the visiting of our website <http://www.gmedes.com/> (our “**Site**”) and collective sites, you accept and consent to the practices set out below.

1 Collection of information

1.1 For the purposes outlined in Clause 2, we may collect and process the following information about you:

(a) *Information you give us* - information that you provide us (which may include your NRIC, passport or other identification number, name, mailing address, shipping address, email address, telephone number(s), banking/credit card information and other personal descriptions) by filling in forms on our Site, or by corresponding with us (by phone, email or otherwise), for example:

- (i) when you report any problem to us;
- (ii) when you use certain features on our Site;
- (iii) when you request any support from us; or
- (iv) when you complete any survey or questionnaire we send you.

(b) *Information we collect about you* - information automatically collected when you visit our Site, for example:



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- (i) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet and your log-in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- (ii) information about your visit, including the full Uniform Resource Locators (URLs), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page;
- (iii) form submissions, applications, requests or feedback to us when you ask to be contacted;
- (iv) when you interact with our customer service officers, for example, via telephone calls, letters, face-to-face meetings and emails;
- (v) when you use our electronic services, or interact with us via any of our websites or use the services on any of our websites;
- (vi) when you submit your Personal Data to us for any other reason.

1.2 We only retain personal data for so long as it is necessary. Data may be archived as long as the purpose for which the data was used still exists.

2 Uses made of the information

We use information held about you for the following purposes:

- (a) verifying your identity;
- (b) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
- (c) providing, improving and developing our services;
- (d) researching, designing and launching new features or products;
- (e) presenting content and information in our Site in the most effective manner for you and for the device you use;
- (f) providing you with alerts, updates, materials or information about our services or other types of information that you requested or signed up to;
- (g) matching any Personal Data which relates to you for any of the purposes listed herein;



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- (h) in any part of the world;
- (i) communicating with you and responding to your questions or requests; and
- (j) purposes directly related or incidental to the above.

3 Disclosure of your information

We will keep your personal data, we hold, confidential but you agree we may provide information to:

- (a) any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 5 of the Companies Act (Chapter 50);
- (b) personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services (for example staff engaged in the fulfilment of your order, the processing of your payment and the provision of support services);
- (c) our overseas offices, affiliates, business partners and counterparts (on a need-to-know basis only);
- (d) persons under a duty of confidentiality to us;
- (e) persons to whom we are required to make disclosure under applicable laws and regulations in any part of the world; or
- (f) actual or proposed transferees of our operations (or a substantial part thereof) in any part of the world.

4 Third-party web services

4.1 We may use third-party web services on our Site. The service providers that administer these services use technologies such as cookies (which are likely to be analytical/performance cookies or targeting cookies), web server logs and web beacons to help us analyse how visitors use our Site. The anonymised information collected through these means (including IP addresses) is for internal consumption on usage patterns and behavior on our Site. We have exercised the right to not collect individual-identifying data, however we have no control over the web services.



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5 Third-party sites

Our Site or our communication with you may from time to time contain links to third-party websites over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. We encourage you to read the privacy policies or statements of these websites understand your rights. We accept no responsibility or liability for any practices of third-party websites.

6 Security

- 6.1 All information you provide to us is stored on secure MTCS L3 accredited cloud servers.
- 6.2 We restrict access to personal information to our employees, service providers and contractors on a strictly need-to-know basis and ensure that those persons are subject to contractual confidentiality obligations.
- 6.3 We review our information collection, storage and processing practices from time to time to guard against unauthorised access, processing or use.
- 6.4 Please note, however, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk.

7 Data transfer

- 7.1 The data that we collect from you may be transferred to, and stored at, a destination outside Singapore for reasons of redundancy. It may also be processed by persons referred to in Clause 3 above who operate outside Singapore.
- 7.2 By submitting your personal data you agree to this transfer, storing or processing of data outside Singapore. We will take all steps reasonably necessary to ensure that your data is treated securely in accordance with this privacy policy.

8 Your rights

- 8.1 You have the right to:
 - (a) check whether we hold personal data about you;
 - (b) access any personal data we hold about you; and
 - (c) require us to correct any inaccuracy or error in any personal data we hold about you.



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8.2 Requests Clause 8.1(a) and Clause 8.1(b) may be subject to a small administrative fee to meet our cost in processing your request.

9 **Changes to our privacy policy**

We may amend this policy from time to time by posting the updated policy on our Site. By continuing to use our Site after the changes come into effect means that you agree to be bound by the revised policy.

10 **Contact us**

If you have any questions, comments or requests regarding personal data, please address them to:

Data Protection Officer

E-mail: dpo@gmedes.com

Last updated: **2 April 2019**