

# Privacy Policy

## NCS Cold Store (S) Pte Ltd

### 1. Who We Are?

- (a) We are NCS COLD STORES (S) PTE LTD (“NCS” or “we” or “our” or “us”). We are a limited company registered in Singapore (Co. Reg. No. 198001191N) with our registered address at 1 Fishery Port Rd, Jurong Town, Singapore 619729.

### 2. What Is The Purpose of This Policy?

- (a) The purpose of this Privacy Policy is to inform you and provide you with an understanding of how we handle, collect, use, disclose and deal with personal data about you including personal data that you provide us, that we receive through/from third parties, that is in our possession or that comes into our possession, whether now or in the future. Please read this Privacy Policy carefully. In this Privacy Policy, “you” or “your” refers to the individual whose personal data we are receiving, collecting, using, disclosing or processing.
- (b) We take our responsibilities under Singapore’s Personal Data Protection Act (the “PDPA”) seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.
- (c) The contents of this Privacy Policy may change over time so please check back frequently. Any changes to this Privacy Policy will be posted on and can be viewed at our website <https://www.ncscs.com.sg/>.
- (d) We own and/or operate website(s) such as <https://www.ncscs.com.sg/> and/or any mobile apps that may be published by us (the said website(s) and mobile apps may be collectively or individually referred to as the “Website”).

### 3. What Information Do We Receive/Collect?

- (a) “Personal data” is defined under the PDPA to mean data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organization has or is likely to have access. NCS receives or collects information about you, such as but not limited to when you provide your information to us, when you use our Website, when you interact with us, when you interact with or enter into (or attempt to enter into) a transaction with us. Personal data which we may receive or collect include but may not be limited to:

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- Name
  - Home address
  - Contact information such as mobile number, email address
  - Personal information of a third-party individual to whom you wish the delivery to be made to
  - Transactional information
  - Your preferences
  - Credit card and/or other financial-related information that is used for a transaction
  - Location information of yourself and/or your computer or device
- (b) We will receive or collect your personal data in accordance with the PDPA.
- (c) We may collect and store certain information automatically when you visit the Website. Examples include the internet protocol (IP) address used to connect your computer or device to the internet, connection information such as browser type and version, your operating system and platform, a unique reference number linked to the data you enter on our system, login details, the full URL clickstream to, through and from the Website (including date and time), cookie number and/or your activity on our Website, including the pages you visited, the searches you made.
- (d) We may receive information about you from third parties if you use any websites or social media platforms operated by third parties (for example, Facebook, Instagram, Twitter etc.) and, if such functionality is available, you have chosen to link your profile on our Website with your profile on those other websites or social media platforms.
- (e) Without prejudice to the generality of paragraph (a) above, some instances of when we may collect personal data about you would be when you:
- Visit NCS Website with a cookies-enabled browser or register a user account or use our Website services and applications including establishing any online accounts with us;
  - Conduct any online transactions;
  - Download or use any of our mobile applications (apps);
  - Apply to be a member of any of our programs;
  - When you provide personal data by filling in online or hardcopy forms, or subscribe to our mailing/marketing lists for email subscription, postal

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promotions, phone or other forms of marketing (such as via telephone calls, messaging by SMS/MMSs and WhatsApp);

- Interact with our representatives via telephone calls, messaging by SMS/MMSs and WhatsApp, letters, face-to-face meetings, emails or submit a comment, question or feedback to us using a “Contact Us” or similar feature on our Website or social media pages, or contact us and disclose your personal data in any other way;
- If and when you respond to any of NCS’ marketing promotions, newsletters and other communication materials;
- If you participate in any lucky draws or competitions, exhibition, event or workshop organized by NCS or where NCS is a participant;
- When you fill up online and hardcopy job application forms to apply for a job at NCS;
- You submit your personal data to us for any other reason.

#### 4. Cookies

- (a) We may use cookies to identify you from other users on the Website.
- (b) A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer or device.
- (c) You can block or deactivate cookies in your browser settings.
- (d) We use log-in cookies in order to remember you when you have logged in for a seamless experience.
- (e) We may use session cookies to track your movements from page to page and in order to store your selected inputs so you are not constantly asked for the same information.
- (f) Our Website may use Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the Website and ways that we can improve your experience. These cookies may track things such as how long you spend on the Website and the pages that you visit so we can continue to produce engaging content.
- (g) By continuing to use the Website, you are agreeing to the use of cookies on the Website as outlined above. However, please note that we have no control over the cookies used by third parties.
- (h) You may reject the use of cookies on websites by configuring your browser to disable the use of cookies. However, this may result in the loss of functionality

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which may restrict your use of the Website and/or delay or affect the way in which the Website operates. If you disable the use of cookies, you may no longer be able to receive personalized features of the Website, which rely on the use of cookies.

- (i) For further information on types of cookies and how they work, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### 5. Geo-location Services

- (a) Our Website and mobile or web-based applications may offer location-enabled services. We may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location. You may be asked if the geo-location service can be activated and you can also object to this geo-location service within the respective mobile or web-based application.

### 6. The Purposes For Which We Collect, Use, or Disclose Your Personal Data

- (a) NCS will/may collect, use, disclose and/or process your personal data for one or more of the following purposes:
- Processing, facilitating and/or dealing with your interest in our products and/or services;
  - Considering, processing, facilitating (including carrying out risk or fraud analysis), dealing with and/or managing:
    - ◇ Your request/application for or your purchase of, intended purchase of or your subscription for, our products and/or services; and/or
    - ◇ Your participation or intended participation in a lucky draw, contest or game, that is run, administered or published by us and/or our partners, (the “Transaction”);
  - Dealing with, facilitating, processing and/or administering the account that you may open with us;
  - Facilitating, processing, dealing with, administering and/or managing Transaction(s) or intended Transaction(s). Without prejudice to the generality of the foregoing, this includes processing and managing your online orders and their delivery;

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- Providing products or services to you;
- Administering, facilitating, managing, processing and/or dealing with your relationship with us, your transaction(s) with us, your being our loyalty card member or rewards member, any transactions or activities carried out by you on the Website or at our premises/establishments or with us, your requests, including but not limited to dealing with your ad-hoc queries, requests or bookings, dealing with your preferences, dealing with your membership needs, dealing with your delivery needs, processing orders and payment transactions, implementing transactions and the supply of products and/or services to you that you have requested. Without limiting the generality of the foregoing, should you make a transaction that includes third-party individual(s) or on behalf of third-party individual(s) or for third-party individual(s), you consent to us disclosing personal data that identifies you, to the said third-party individual(s) (such as but not limited to your name);
- Administering, facilitating, processing and/or dealing in any matters relating to your use or access of the Website or including identifying you for login to the Website, our portals and other online services provided by us. Without limiting the generality of the foregoing:
  - ⇒ This may include our collection and subsequent processing of your location data or data that identifies your location;
  - ⇒ If you:
    - ◇ Gain access to or sign in to the Website, using your login credentials of a Social Networking Site, or
    - ◇ Use any features of a Social Networking Site such as its widgets, plug-ins and browser push notifications, made available to you on our Website, it may result in information or your personal data being collected or shared between us and the third party. For example, if you use Facebook’s “Like” feature, Facebook may register the fact that you “liked” a product and may post that information on Facebook. (“Social Networking Site” refers to an online or digital platform owned or operated by a third party, that is used by people to build social networks or social relations, or to interact, with other people, such as but not limited to Facebook, Instagram, Twitter). By your proceeding pursuant to (i) or (ii) above, you consent to such collection, use or disclosure of your personal data;

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- (b) Monitoring, processing and/or tracking your use of the Website in order to provide you with a seamless experience, facilitating or administering your use of the Website, and/or to assist us in improving your experience in using the Website;
- (c) Administering, facilitating, processing and/or dealing in any transactions or activities carried out by you on the Website;
- (d) Providing services to you as our customer, as a member of our loyalty programme(s)/card programme(s)/rewards programme(s) or when requested by you; dealing with or administering your participation in contests, lucky draws, gamification, social events organized by us;
- (e) Carrying out and/or facilitating your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (f) Contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for one or more of the Purposes stated herein. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
- (g) Understanding and/or managing your interests, concerns and preferences;
- (h) The conduct of training or training purposes, so as to develop or improve our products or services and/or our staff's and agents' services and/or service quality. Without limiting the generality of the foregoing, such training may involve collection, use, disclosure or processing of your personal data including your feedback or comments or reviews;
- (i) Carrying out due diligence or other screening activities (including background checks, anti-money laundering checks, know your client checks) in accordance with legal or regulatory obligations (whether of Singapore or other countries) applicable to us or any NCS Group entity, the requirements or guidelines of governmental authorities (whether of Singapore or other countries) which we determine are applicable to us or any NCS Group entity, and/or our or any NCS Group entities' risk management procedures that may be required by law (whether of Singapore or other countries) or that may have been put in place by us or any NCS Group entities. "NCS Group" refers to us and our affiliates, related corporations and associated companies, around the world;

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- (j) To prevent or investigate any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned, regardless that such prevention or investigation involves us and/or is done by us or any NCS Group entities; dealing with conflict of interests; or dealing with and/or investigating complaints; carrying out fraud detection and/or credit risk control in relation to your Transactions/online transactions or attempted Transactions/online transactions;
- (k) Complying with or as required by any applicable law, governmental or regulatory requirements of any jurisdiction applicable to us or any NCS Group entity, including meeting the requirements to make disclosure under the requirements of any law binding on us or any NCS Group entity, and/or for the purposes of any guidelines issued by regulatory or other authorities (whether of Singapore or other countries), with which we or any NCS Group entity is/are expected to comply;
- (l) Complying with or as required by any request or direction of any governmental authority (whether of Singapore or other countries) which we or any NCS Group entity is/are expected to comply with; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (whether of Singapore or other countries). For the avoidance of doubt, this means that we may/will disclose your personal data to the aforementioned parties upon their request or direction;
- (m) Conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our or an NCS Group entity's products, services and/or facilities in order to enhance any continued interaction between yourself and us or an NCS Group entity connected or in relation to the Website, or your Transaction(s); or to improve any of our or an NCS Group entity's products or services or, whether now or in the future. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face-to-face interview survey or request your feedback, by way of email or postal mail;
- (n) For marketing purposes where you have provided your consent to us for the same, and with such consent, we (and/or the NCS Group) may/would be providing you with marketing, advertising and promotional information, materials and/or documents relating to products, services and/or events (including products, services and/or events of third party organisations with which we may collaborate with, that we (and/or an NCS Group entity) or such third party organisations may be selling, marketing, offering, organizing,

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involved in or promoting, whether such products, services and/or events exist now or are created in the future;

- (o) Storing, hosting, backing up (whether for disaster recovery or otherwise) of your personal data, whether within or outside Singapore;
- (p) To facilitate and/or ensure the safety and security of our premises, our customers, our staff and/or visitors to our premises; to deal with, handle and/or conduct disciplinary, security, crime prevention and/or quality assurance processes, matters and/or arrangements. Without prejudice to the generality of the aforesaid, we wish to bring to your attention that if there are surveillance cameras installed at our premises and/or offices, whether now or in future, such surveillance cameras are for security, crime prevention, safety and training reasons and you acknowledge that your personal data will be collected by such cameras and processed by us consequently, should you visit our premises or offices;
- (q) Maintaining and/or developing our IT or business systems and infrastructure including testing and upgrading of these systems;
- (r) Securing online transactions, preventing fraud, dealing with payment incidents and managing debt collection;
- (s) reading reports with respect to your Transaction(s) and/or transactions that we have with our customers;
- (t) Facilitating, dealing with and/or administering external audit(s) or internal audit(s) of the business of NCS and/or of any NCS Group entities, Transaction(s), and/or our or an NCS Group entity's transaction with our/its customers;
- (u) Dealing with and/or facilitating a business asset transaction or a potential business asset transaction, where such transaction involves NCS as a participant or involves only an NCS Group entity as a participant or involves NCS and/or any NCS Group entities as participant(s), and there may be other third-party organisations who are participants in such transaction. "Business asset transaction" is defined in the PDPA and includes the purchase, sale, lease, merger or amalgamation or any other acquisition, disposal or financing of an organisation or a portion of an organisation or of any of the business or assets of an organisation;
- (v) Record-keeping purposes and producing statistics and research for internal and/or statutory reporting and/or record-keeping requirements, of NCS or of any NCS Group entities;



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- (w) NCS', NCS Group's or an NCS Group entity's reporting purposes including but not limited to reporting on NCS' business performance;
- (x) Anonymization of your personal data. In this regard, you acknowledge that personal data that has been anonymized is no longer personal data and the requirements of applicable local data protection law (i.e. the PDPA) would no longer apply to such anonymized data; and
- (y) To deal with the or as part of a bankruptcy, winding up, reorganization, restructuring, insolvency, receivership or an assignment for the benefit of creditors, of NCS.

(The purposes set out in this paragraph 6 above shall be collectively referred to as the "Purposes")

- (b) Arising from our processing of your personal data, new personal data about you may be created.
- (c) NCS may/will need to disclose your personal data to third parties, whether located within or outside Singapore, for one or more of the above Purposes, as such third parties, would be processing your personal data for one or more of the above Purposes. In this regard, you hereby acknowledge, agree and consent that we may/are permitted to disclose your personal data to such third parties (whether located within or outside Singapore) for one or more of the above Purposes and for the said third parties to subsequently collect, use, disclose and/or process your personal data for one or more of the above Purposes. Without limiting the generality of the foregoing or of paragraph (a), such third parties include:
  - any NCS Group entities;
  - any of our agents, contractors or third-party service providers that process or will be processing your personal data, whether on our behalf or otherwise, including but not limited to those which provide administrative or other services to us such as mailing houses, telecommunication companies, information technology companies and data centres, hosting and maintenance service providers, payment service providers, anti-fraud service providers, analysis services service providers, delivery or logistic service providers, payment transactions service providers, marketing service providers, marketing solution service providers, customer service providers;

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- third parties with whom we enter into or may enter into any contractual or other arrangement in relation to the products or services to be provided to you, or in relation to the Transaction; and
  - third parties to whom disclosure by NCS is for one or more of the Purposes and such third parties would in turn be collecting and processing your personal data for one or more of the Purposes.
- (d) We may share your information with any NCS Group entities, which may be based in countries other than Singapore, from time to time for one or more of the Purposes.
- (e) For the avoidance of doubt, you consent to our using, disclosing and/or processing personal data that we currently possess about you and/or that we had lawfully received or that we lawfully receive in future, from third parties or other NCS Group entities, for the Purposes.
- (f) We may collect, use, disclose or process your personal data for other purposes that do not appear above. However, we will notify you of such other purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.
- (g) We may/will be receiving or collecting from sources other than yourself, personal data about you, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such personal data for one or more of the above Purposes. We may combine information we receive from other sources with information you give to us and/or with information we have about you. We may use this information and the combined information for the Purposes set out above (depending on the types of information we receive).
- (h) We take reasonable steps to ensure that any personal data we collect, disclose and use is accurate and complete, if your personal data is likely to be used by us to make a decision that affects you, or disclosed to another organisation. However, it is important that you advise us of any changes to your personal data or if there are any errors in the personal data we hold about you. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.
- (i) You should ensure that all personal data submitted to us is complete, accurate, true and correct. Failure by you or a relevant third party to do so may result in our inability to provide you with the products and services you have requested.

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### 7. Links to Third-Party Websites

- (a) NCS' Website(s) may contain links to other third-party websites and microsites, whose privacy practices may differ from ours. If you submit personal data to any of those sites, your personal data is not subjected to this Privacy Policy.
- (b) We encourage you to review the Privacy Policy of any website you visit. By clicking on or activating such links and leaving our Website(s), we can no longer exercise control over any personal data or information which you give to any other entity after leaving our Website(s). Any access to such other websites or pages is therefore entirely at your own risk. We are not responsible for the personal data protection policies (including personal data protection and cookies), practices, content or security of any third-party websites linked to or from our Website(s).

### 8. Notification of Reliance on Legitimate Interests Exception to Process Personal Data Without Consent

- (a) NCS may rely on the legitimate interests exception under the PDPA to collect, use or disclose your personal data without your consent, for the purpose of detecting and/or preventing:
  - fraud;
  - an illegal activity; and/or
  - the misuse of services provided by or to be provided by NCS,

on the basis that such collection, use or disclosure is for the legitimate interests of NCS or some other organisation, and that such legitimate interests outweigh any adverse effect (if any) on you.

- (b) Should NCS rely on this exception, NCS may/will need to disclose your personal data that is being processed in reliance on such exception, to third parties, whether located within or outside Singapore, for the purposes stated in paragraph (a) above, and such third parties, would be processing your personal data for the purposes stated in paragraph (a) above.
- (c) Should you have any queries regarding NCS' reliance on this legitimate interests exception, please contact our Data Protection Officer at:  
[info@ncscs.com.sg](mailto:info@ncscs.com.sg)

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### 9. Provision Of Third-Party Personal Data by You

- (a) Should you provide us with personal data of any individual other than yourself, you represent, undertake and warrant to us that:
- for any personal data of individuals that you disclose to us, you would have prior to disclosing such personal data to us obtained consent from the individuals whose personal data are being disclosed, to:
    - ◇ permit you to disclose the individuals' personal data to NCS for the Purposes; and
    - ◇ permit NCS and the NCS Group to collect, use, disclose and/or process the individuals' personal data for the Purposes;
  - at our request, you will use such form(s) or document(s) provided by us in obtaining such consents from the individuals in question (for the avoidance of doubt, we are under no obligation to you to create any such form(s) or document(s));
  - any personal data of individuals that you disclose to us are accurate; and
  - for any personal data of individuals that you disclose to us, that you are validly acting on behalf of such individuals and that you have the authority of such individuals to provide their personal data to NCS and for the NCS Group to collect, use, disclose and process such personal data for the Purposes.

### 10. How Do We Store Data?

- (a) Security of your personal data is important to us. We will put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.
- (b) We will put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

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- (c) Should you choose to unsubscribe from our mailing list or if your membership expires, please note that your personal data may still be retained on our database to the extent permitted by law.

### 11. Rights

- (a) You may withdraw your consent to our use or processing of your personal data, at any time by contacting our Data Protection Officer as follows:

Email: [info@ncscs.com.sg](mailto:info@ncscs.com.sg)

When contacting the Data Protection Officer for assistance, please state (where relevant), your name, contact details and Customer/Membership Number.

Please allow ten (10) working days for your request to be processed.

- (b) If you withdraw your consent to any or all uses of your personal data, depending on the extent of your withdrawal request, we may not be able to provide or continue providing our products and services to you, or administer any contractual relationship already in place. You understand and agree that in such instances where we require your personal data to fulfill a contractual obligation to you and you withdraw your consent for us to collect, use or disclose the relevant personal data for those purposes, we cannot be held liable for breach of that agreement or for our inability to perform such contractual obligation, and you agree that we shall not be liable to you for any loss or damage you suffer arising from our inability to perform such contractual obligation. Our legal rights and remedies in such event are expressly reserved.
- (c) You have the right to ask us not to use your personal data for marketing purposes. Please let us know if you want to withdraw your consent you had provided to us, by emailing us at [info@ncscs.com.sg](mailto:info@ncscs.com.sg)
- (d) You have the right to access and/or correct any personal data that we hold about you, subject to exceptions under the law. This right can be exercised at any time by emailing us at [info@ncscs.com.sg](mailto:info@ncscs.com.sg). We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. With respect to your access request, we may charge a fee in order to process it.
- (e) For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we

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can provide you with the information requested. Note that the PDPA exempts certain types of personal data from being subject to your access request.

- (f) For a request to correct personal data, once we have sufficient information from you to deal with the request, we will correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of personal data from being subject to your correction request as well as provides for situation(s) when correction need not be made by us despite your request.
- (g) Further rights may arise in future under amendments to the PDPA and in such a case, we will accord you such rights as provided for by the PDPA.
- (h) We hold and deal with your personal data in accordance with the PDPA.

### 12. Complaint Process

- (a) If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance.
- (b) Please contact us with your complaint or grievance by emailing us at [info@ncscs.com.sg](mailto:info@ncscs.com.sg)
- (c) Where you are sending an email in which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".
- (d) We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

### 13. General

- (a) Your consent that is given pursuant to this Privacy Policy is additional to and does not supersede any other consents that you had provided to NCS or any NCS Group entities with regard to processing of your personal data.
- (b) For the avoidance of doubt, in the event that Singapore personal data protection law permits an organisation such as us to collect, use or disclose your personal data without your consent, such permission granted by the law

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shall continue to apply. Further, where Singapore personal data protection law permits us to handle, retain or process your personal data without having to comply with or as exceptions to, the data protection obligations in the PDPA, such rights given to us to do so will continue to prevail, notwithstanding anything stated in this Privacy Policy.

- (c) All other questions on our use of your Personal Data should be sent to [info@ncscs.com.sg](mailto:info@ncscs.com.sg)