

# Privacy Policy

## 1. Introduction

- 1.1 This Privacy Policy ("**Policy**") sets out the responsibilities and policies that China Unicom (Singapore) Operations Pte. Ltd. ("**CUSG**", "**we**", "**us**", or "**our**") shall adhere to while collecting, using, disclosing, transferring, processing, retaining and protecting your personal data. This Policy explains the measures taken by CUSG in complying with the requirements under the Personal Data Protection Act 2012, as amended from time to time ("**PDPA**").
- 1.2 CUSG complies with its responsibilities and requirements under the PDPA. We are committed to safeguarding your personal data in the process of collecting, using, disclosing, transferring, processing, and retaining your personal data and will use our best endeavours to protect our customers' personal data.
- 1.3 "**Personal data**" shall have the same meaning as defined under the PDPA.
- 1.4 "**Customer**", "**you**" or "**your**" refers to you or our customer.

## 2. Collection and Use of Personal Data

- 2.1 As a customer of CUSG, or a visitor or user of our website(s), it may be necessary for you to provide us with your personal data when you apply, subscribe or continue to use our products or services.
- 2.2 If you provide personal data of third parties to us, you must ensure that you have obtained all necessary consents from such third parties and that the third party is fully aware of this Policy.
- 2.3 We may collect the following personal data and/or company data:-
  - name;
  - country;
  - address;
  - phone number;
  - email address;
  - company name;
  - place of incorporation;
  - business type;
  - any information related to the use of our service and billing; or
  - any information required by CUSG in order to provide service/product to the customer.

2.4 CUSG may collect, use and analyse customers' personal data for the following purposes:

- verifying your personal data and identity;
- processing your service application, and providing you with our products, services, devices and loyalty programs;
- handling your instructions, requests and responding to your inquiries, including but not limited to payment instructions and the provision of our services including direct debt and/or credit facilities as requested by you;
- performing account management, phone call services, credit, finance or other related services;
- conducting survey and analysis to understand and evaluate or explore customer's needs, credit limits, and payment status;
- evaluating debt owed by customer;
- conducting credit checks and management, including debt recovery;
- daily operation of products and services provided to customers;
- performing research and analysis to improve and optimise our services and/or loyalty programs made available to you and your customer experience;
- designing other products and services and/or enhancing existing products and services offered by us;
- with your consent, marketing products, services and other subjects to you;
- enabling CUSG to perform any obligations or conform with other industry practices;
- complying with any disclosure requests from government or regulatory authorities and any requirements under applicable law;
- detection or prevention of crime; and
- any other purposes directly related or incidental to the above purposes.

### **3. Consent Withdrawals**

3.1 The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you. You may withdraw consent and request us to stop using and/or disclosing your personal data by *submitting a request in writing to our Data Protection Officer at the contact details provided below.*

3.2 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which

may affect your rights and liabilities to us. In general, we shall seek to process your request within *ten (10) business days* of receiving it.

3.3 If you withdraw your consent to any or all use of your personal data or do not consent to the collection of your personal data by us, we may not be able to handle your application or request, respond to your inquiries, or provide you with our products and services. You understand and agree that in such instances where CUSG requires your personal data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant personal data for those purposes, CUSG cannot be held liable for breach of that agreement. CUSG's legal rights and remedies in such event are expressly reserved.

3.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws in any jurisdiction.

#### **4. Accuracy**

4.1 CUSG will take measures to verify the accuracy of the personal data it collects. When providing personal data to us, you should ensure that their personal data is accurate and to update us when there are changes in your personal data.

#### **5. Security**

5.1 We strive to ensure that your personal data is stored safely and securely on our system which can only be accessed by our authorized personnel. We prohibit unauthorised access and inspection of the personal data collected from you.

#### **6. Access and Correction of Personal Data**

6.1 You are entitled to:-

- (a) check if CUSG is holding your personal data and to request access to such data;
- (b) correct your personal data if it is inaccurate; and
- (c) ascertain CUSG's policies and practices in relation to personal data.

6.2 In compliance with the PDPA, CUSG has the right to charge a reasonable fee for processing a data access request.

6.3 If you wish to check whether we hold your personal data, access personal data held by us or correct your personal data held by us which is inaccurate, please contact our Data Protection Officer in the manner described in clause 9 below.

#### **7. Data Retention**

7.1 CUSG will retain your personal data only for as long as necessary for the fulfilment of the purposes that such data was collected, unless the personal data is also retained to satisfy any applicable legal, statutory or contractual obligations.

7.2 CUSG will erase all unnecessary personal data from its system in accordance with its internal policies.

## **8. Disclosure of Personal Data**

8.1 We will keep your personal data confidential but may provide your personal data to the following parties for the purposes set out above:-

- (a) CUSG's related corporations, holding companies, affiliated companies, joint venture companies and any other companies controlled by CUSG or companies that are under the same shareholding structure;
- (b) any agent, contractor or third party service provider who provides administrative, billing and debt-recovery, customer support, information technology, marketing, advertising and telemarketing services, market research, customer usage and behavioural analysis, process management, after-sales service, mailing, telecommunications, data processing, telemarketing and direct sales, computer, cloud, payment, call centre, or other services to CUSG;
- (c) any banking or financial institutions, mortgage and credit card issuing companies, credit information bureau, debt-collection agencies or debt-recovery organizations;
- (d) other telecommunication providers; and/or
- (e) government, law enforcement, regulatory or other authorities where required by or otherwise permitted by law.

## **9. Enquiries**

Should you have any enquiries concerning this Policy, please feel free to contact our Data Protection Officer in writing via post at 8 Temasek Boulevard, #39-03, Suntec Tower Three, Singapore 038988 .