



Privacy Statement

Scope

This Privacy Statement EXION ASIA PTE LTD (EA) governs the collection, use and other forms of processing of personal data by EA related to our services, our products and this website.

Who is responsible for processing your personal data?

EA (8 Pioneer Walk, Singapore 627635) is the legal entity responsible for all collection and all processing of your personal data in connection with the products, services and websites of EA.

EA is part of Pon Holdings B.V. and its subsidiaries ("Pon"). EA and Pon are committed to respecting and safeguarding your privacy and the security of your personal data you share with us.

Why do we process your personal data?

Personal data is information that identifies you as an individual or relates to an identifiable individual. When you choose to register your personal data, contact us, or visit our websites, we will process some personal data about you. We process these personal data for the following purposes:

1. communicate with you in a personal way or to inform you about EA products or services, consistent with your choices;
2. provide customer service, including service around the purchase of services and products, fulfil warranty obligations and product recalls for our own services and those of related companies, and to deal with any enquiries or complaints;
3. administer and fulfil your purchases of EA products including the financial and logistic handling;
4. administer your EA account;
5. administer your participation in any contests, promotions, surveys or website features;
6. perform market research and improve our business, services and EA products or to develop new business, services and products;
7. perform statistical analyses and reporting;
8. providing services on the internet;
9. offering a loyalty program and communicating with participants;
10. provide app functionality, including providing relevant commercial messages;
11. communicate future promotional and marketing information including direct marketing purposes and retargeting;
12. aggregate and/or anonymize personal data in order to generate other data for our use;
13. comply with our legal obligations, resolve disputes, or enforce our agreements;
14. as otherwise stated at or about the time information is collected.

Which personal data we process?

Which personal data we exactly process, depends on which websites, products or services you use. We process the following personal data.

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Personal data you provide to us:

- This is the personal data that you enter when you use our websites, products or services if required or applicable. This data includes e.g. your name, address, gender, email address, phone number, age, birth date, EA products you bought, the account name and password that you create, bank details for buying EA products.

How do we process your personal data?

In the table below we describe per way of processing: the personal data and the purposes for which we process the personal data as well as the legal basis for the processing:

Ways of processing	Personal data processed	Purposes for processing the personal data	Legal basis
Contact form customer service	Name & email address, telephone no. (optional), products/services/matters enquired	The above described purposes: 1, 2, 6, 7, 8, 11, 12, 13 and 14	Performance of a contract or legitimate interest
Visit our websites (cookies)	Metadata, name, email address, telephone no. (optional), enquiry sent in	The above described purposes: 6, 7, 8, 11, 12, 13 and 14	Consent or legitimate interest
Use of our app	Metadata, name, email address, telephone no. (optional), enquiry sent in	The above described purposes: 1, 2, 6, 7, 8, 10, 11, 12, 13 and 14	Consent or legitimate interest



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Our legitimate interests include: marketing, advertising, security, (crime) prevention, IT management, research and analysis of our products or services, business management, legal affairs, internal management.

You have the right to withdraw your consent which you may have given to the processing of your personal data at any time by sending your withdrawal request to privacy@poncom.

How do we share or transfer your personal data?

You should be aware that EA is part of a business group within Pon and that departments (like IT, Marketing) can be located in Pon companies around the world. As a consequence your personal data may be shared within and/or transferred to other business group companies or other Pon companies around the world. You can consult the list and location of our companies here: <http://www.pon.com/en/our-business/bedrijven>.

EA may share your personal data also with third parties to perform certain processing activities on behalf of EA and to facilitate services they provide to us. These can include providers of services such as website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services. EA may also share your personal data to third parties, to permit them to send you marketing communications, consistent with your choices. EA requires these third parties to process and protect your personal data diligently. EA will not sell your personal data to third parties.

EA or Pon might reorganize, merge or in any other way sell or dispose (part of) a business company to another company. Where such business relates to EA, such transfer of ownership may include the transfer of your personal data to the new owner and its advisors.

We will otherwise only disclose your personal data if so required or authorized by law, where necessary for preventing or combating fraud, where necessary for dispute resolution, or for any other pressing legitimate need which under the circumstances must outweigh your privacy interests, such as the security of our business and the safety of our staff.

How do we protect your personal data?

EA will take appropriate technical and organizational security measures against loss or unlawful processing of personal data. This may include using secure registration forms, encryption of data, and restricting access to your personal data.

Please note that some third countries do not provide for an adequate level of protection for your personal data. However, you can be assured that EA will take appropriate safeguards for the confidentiality and protection of your data.

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How long do we retain your personal data?

We retain personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our services to you (for example, for as long as you have an account with us or keep using our services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Cookies, web beacons and similar techniques

If you are using our websites, services, applications, communications (including email) and accessing or using tools, we may use cookies, web beacons and other similar technologies for storing information to provide you with a better, faster and safer browser experience.

Your rights

If you would like to request to review, correct, update, suppress, restrict or delete personal data, object to the processing of personal data, or if you would like to request to receive an electronic copy of your personal data for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law), you may contact us via privacy@pon.com or 8 Pioneer Walk, Singapore 627635. We will respond to your request consistent with applicable law.

In your request, please make as clear as possible what personal data your request relates to. For your protection, we may only implement requests with respect to the personal data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable and in any event within any applicable legally required timeframes.

Contact, questions, feedback and Data Protection Officer

If you have any questions about this Privacy Statement, please contact us at privacy@pon.com.

You may also contact our Data Protection Officer (DPO) via privacy@pon.com. You have the right to lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs.



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For more information about privacy issues in Singapore and protecting your privacy, visit the Personal Data Protection Commission Singapore's website: <http://www.pdpc.gov.sg/>.

Policy changes

We may change this Privacy Statement from time to time. Any changes will become effective when we post the revised Privacy Statement. If necessary, we will inform you when we change the Privacy Statement. This statement was last modified on date: 31 August 2020.