

Privacy Statement

Definitions

PDPA: An Act established Singapore Government to govern the collection, use and disclosure of personal data and to establish the Do-Not-Call (DNC) Register.

Data Protection Officer: A person designated by the senior management to be responsible for ensuring that Exion Asia complies with the PDPA Act 2012.

DNC Registry: A Do-Not-Call registry maintained by the Personal Data Protection Commission, pursuant to the PDPA.

Individual: Refers to any natural persons, whether living or deceased, and “Individual” means any of them.

Personal Data: Data that is capable of identifying a natural person, whether on its own or in conjunction with other data that is accessible to Exion Asia or SWTS Asia Group.

Personnel: Any person(s) engaged under a contract of service or contract for service with Exion Asia, SWTS Asia Group, Board of Directors, permanent or temporary employees, as well as trainees, interns and volunteers.

Overview

Exion Asia Pte Ltd (“*Exion Asia*”) is part of SWTS Asia Pte Ltd, its affiliates and its subsidiaries (“*SWTS Asia Group*”). Exion Asia and SWTS Asia Group are committed to respecting and safeguarding your privacy and the security of your personal data you share with us.

Exion Asia and SWTS Asia Group has an obligation to protect the confidentiality of non-public information consistent with the local Government’s statutory requirements and laws and to protect these information against unauthorized access that could result in any type of loss or inconvenience for its members.

Purpose

This Privacy Statement of Exion Asia governs the collection, use and other forms of processing of personal data by Exion Asia related to our services, products and websites.

Who is responsible for processing your personal data?

Exion Asia Pte Ltd will be the legal entity responsible for all collection and processing of your personal data in connection with the products and services being offered on Exion Asia website.

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 Exion Asia 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 Exion Asia services and products including the financial and logistic handling
4. administer your Exion Asia account on its website
5. administer your participation in any contests, promotions, surveys or website features
6. perform market research and improve our business, products and services or to develop new business, products and services
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. to communicate future promotional and marketing information including direct marketing purposes and retargeting
12. to aggregate and/or anonymize personal data in order to generate other data for our use
13. to 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 you provide to us:

- This is the personal data that you enter when you use our websites, products or services. This data includes but not limited to your name, address, NRIC / FIN / WP No (to issue the official certificate), gender, email address, phone number, age, birth date, our products or services you bought.

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 from customer service	Name and email address	As described in above purposes: 1, 2, 6, 7, 8, 11, 12, 13 and 14	Performance of a contract or legitimate interest
Attend to online forum and training	Name, gender, NRIC / FIN / WP No (to issue the official certificate), address, contact number, email, company name	As described in above purposes: 1, 5, 6, 8, 11, 12, 13 and 14	Consent legitimate interest
Visit our websites (cookies)	Metadata NB: please refer to our Cookie Policy Exion Asia for further details	As described in above purposes: 6, 7, 8, 11, 12, 13 and 14	Consent or legitimate interest
Log on our websites via social media	NB: we never get access to your social media account	As described in above purposes: 1, 6, 7, 8, 11, 12, 13 and 14	Consent or legitimate interest

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@exionasia.com.

How do we share or transfer your personal data?

You should be aware that Exion Asia is part of a business group within SWTS Asia Group and that departments (e.g. IT, Marketing, etc) can be located in other countries around Asia. As a result, your personal data may be shared within and/or transferred to other SWTS Asia business group or affiliated companies. You can consult the list and location of our companies here:

<https://www.swtsasia.com>.

Exion Asia may share your personal data also with third parties to perform certain processing activities on behalf of Exion Asia and to facilitate services they provide to us. These can include providers of services such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.

Exion Asia may also share your personal data to third parties, to permit them to send you marketing communications, consistent with your choices. Exion Asia requires these third parties to process and protect your personal data diligently. Exion Asia will not sell your personal data to third parties.

Exion Asia or SWTS Asia Group might reorganize, merge or in any other way sell or dispose (part of) a business company to another company. Where such business relates to Exion Asia, 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?

Exion Asia 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 Exion Asia will take appropriate safeguards for the confidentiality and protection of your data. You may obtain a copy of these measures by contacting privacy@exionasia.com.

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).
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Telephone numbers registered with the DNC Registry

Exion Asia is prohibited from sending unsolicited telemarketing messages ("specified messages") to Singapore telephone numbers through voice calls, text or fax messages registered on the DNC Registers unless Exion Asia has obtained the relevant Individual's clear and unambiguous consent in written form.

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.

Please refer to our **Cookie Policy** (*Annex A*) for the explanation of cookies, web beacons and similar techniques, how we use these techniques and how you can control these techniques.

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@exionasia.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 for clarifications

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

You may also contact our Data Protection Officer (DPO) via privacy@exionasia.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.

For more information about privacy issues in Singapore and protecting your privacy, visit the Personal Data Protection Commissioner Singapore, website: <https://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 Privacy Statement was last modified on date: **20th October 2022**.