



## VINUM PTE LTD PERSONAL DATA PROTECTION NOTICE

This Data Protection Notice ("Notice") sets out the basis which Vinum Pte Ltd and its affiliates ("we", "us", or "our") may collect, use, disclose or otherwise process personal data of our clients in accordance with the Personal Data Protection Act ("PDPA"). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

This Privacy Policy describes how Vinum Pte Ltd ("Vinum") manages your Personal Data, in compliance with the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act"). Vinum includes business divisions such as Vinum Fine Wines. We encourage you to read this Privacy Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

"Personal Data" refers to data, whether true or not, about an individual who can be identified from that data, or from that data in combination with other information to which the organisation may have access and includes the meaning otherwise as defined in the Act as amended from time to time.

By interacting with us, submitting information to us or signing up for any promotions or services offered by Vinum, you agree and consent to us, its related corporations and affiliates, (collectively referred to herein as "VINUM", "us", "we" or "our"), as well as our respective representatives collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to Vinum's authorised service providers and relevant third parties in the manner set forth in this Privacy Policy.



This Personal Data Protection Policy supplements but does not supersede nor replace any other consent(s) you may have previously provided to Vinum in respect of your Personal Data.

Vinum may update this Personal Data Protection Policy to ensure that it is consistent with industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Personal Data Protection Policy as updated from time to time on our website [www.vinum.com.sg](http://www.vinum.com.sg).

## **1) Personal Data**

In this Personal Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us include your name, NRIC, passport or other identification number, telephone numbers, mailing address, email address, network data and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

## **2) Collection of Personal Data**

Generally, Vinum collects Personal Data, either directly from you or from your authorised representatives (i.e. persons whom you have authorised, persons who have been validly identified as being you or your authorised representative pursuant to our then-current security procedures), from third parties, or from publicly available sources or through our website in the following ways:

- when you submit a form for registering for our mailing list on our website or any other forms relating to any of our Products and Services;
- when you interact with our sales team, for example, via telephone calls, letters, face-to-face meetings and emails;

- when you request that we contact you, be included in an email or other mailing list;
- when you respond to our promotions, initiatives or to any request for additional Personal Data;
- when you are contacted by, and respond to, our marketing representatives and client service team;
- when we receive references from business partners and third parties, for example, where you have been referred by them;
- when you submit your Personal Data to us for any other reasons;
- When you browse our website, you generally do so anonymously but please see Clause 5) below on cookies.

If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.

### **3) Purposes for the Collection, Use and Disclosure of Personal Data**

Vinum may collect, use and disclose your Personal Data for the following purposes:

- responding to your queries and requests;
- managing the administrative and business operations of Vinum and complying with internal policies and procedures;
- facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- resolving complaints and handling requests and enquiries;
- preventing, detecting and investigating crime and analysing and managing commercial risks;

- providing media announcements and responses;
- organising promotional events;
- legal purposes (including but not limited to obtaining legal advice and dispute resolution);
- conducting investigations relating to disputes, billing or fraud;
- meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Vinum (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and
- purposes which are reasonably related to the aforesaid.

**Where permitted under the Act:**

Vinum may also collect, use and disclose your Personal Data for the following “Additional Purposes”:

- analytics and tracking,
- conducting market research and surveys to enable us to understand and determine client location, preferences and demographics to develop special offers and marketing programmes in relation to Vinum's Products and Services, and to improve our service delivery and your purchase experience;
- providing additional Products and Services and benefits to you, including promotions from Vinum;
- matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of Products and Services by Vinum;
- communicating with you on advertisements involving details of our Products and Services, special offers, either to our clients generally, or which we have identified may be of interest to you (including but not limited to upselling, cross selling and online marketing);



- organizing promotional events and corporate social responsibility projects; and purposes which are reasonably related to the points mentioned above.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, from Vinum under “Additional Purposes”, to the vendors or other third party service providers in connection with promotions and services offered by Vinum.

If you have provided your Singapore telephone numbers, Vinum may contact you using such Singapore telephone numbers (including via voice calls, sms, fax or other social media means) with information about our Products and Services or those products and services offered by our preferred partners (including discounts and special offers).

In relation to particular Products and Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

Should you wish to withdraw your consent for us to send you sales, marketing or promotional information via a specific mode, please inform us in the following methods:

- to withdraw consent from promotional emails: please click on the ‘Unsubscribe’ hyperlink in the promotional emails;
- to withdraw consent from any other means: please write to [dpo@vinumfinewines.com](mailto:dpo@vinumfinewines.com) to request for a Correction Form\* to be submitted to us.

Once we receive confirmation and form\* that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to thirty (30) days for your withdrawal to be reflected in our systems. Therefore, you may still receive marketing



or promotional materials/communication during this period of time. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials through a specific mode, we may still contact you for other purposes in relation to the Products and Services that you hold or have subscribed to with Vinum.

#### **4) Disclosure of Personal Data**

Vinum will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

- Vinum's related corporations and employees to provide content, Products and Services to you, address your questions and requests in relation to our client accounts, subscription and billing or order arrangements with us as well as our Products and Services, to activate, deactivate, install, maintain and operate our systems and/or services;
- companies providing services relating to insurance and consultancy to Vinum;
- agents, contractors or third party service providers who provide operational services to Vinum, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to Vinum;
- any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
- our professional advisers such as auditors and lawyers;
- relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- any other party to whom you authorise us to disclose your Personal Data to.



## 5) Use of Cookies

A cookie is a small piece of information that is placed on your computer when you visit certain websites. Most websites like ours use cookies to enhance your online experience.

Vinum uses cookies on its websites for the following purposes:

Enabling of certain features and functions on our websites, eg. browsing and other service preferences of how you and other users use the website and improving the efficiency of our website administering services to you and to advertisers; and establishing usage statistics

Most internet browsers provide you the option of turning off the processing of cookies (please see the “help” section of your browser), but this may result in the loss of functionality, restrict your use of the website and/or delay or affect the way in which it operates.

Vinum is not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party websites linked to the Vinum’s website.

## 6) Contacting Us

For any questions relating to your Personal Data or about our Privacy Policy, you may contact our Data Protection Officers at [dpo@vinumfinewines.com](mailto:dpo@vinumfinewines.com)

## 7) Governing Law

This Personal Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.