

# Urban Origins Privacy Policy

Last updated 27th September 2021

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## Privacy Policy

Urban Origins Pte. Ltd., Singapore (we, us, our) complies with applicable privacy laws, including the Singapore Personal Data Protection Act 2012 (the Act), when dealing with personal data. Personal data is information about an identifiable individual (a natural person).

This Privacy Policy sets out how we collect, use, disclose and protect your personal data. If you have any questions arising in relation to the collection, use, disclosure or protection of your personal data, contact our Data Protection Officer at [support@urbanorigins.sg](mailto:support@urbanorigins.sg).

This Privacy Policy does not limit or exclude any of your rights under the Act. If you wish to seek further information on the Act, see the website of the Singapore Personal Data Protection Commission (PDPC) at [www.pdpc.gov.sg/home](http://www.pdpc.gov.sg/home).

This Privacy Policy should be read in conjunction with Urban Origins Pte. Ltd.'s Website Terms of Use (Terms). Words in this Privacy Policy with capital letters have the same meanings as those given to them in the Terms.

## Changes to this Privacy Policy

We may change this Privacy Policy by uploading a revised Privacy Policy onto the Website. The change will apply from the date that we upload the revised Privacy Policy.

## Collecting your Personal Data

We collect personal data about you from:

- You, when you provide that personal data to us, including via the Website, through any account set-up process, and through any contact with us (e.g. telephone call or email)
- Third parties where you have authorised this or the information is publicly available.

If possible, we will collect personal data from you directly.

## How we use your Personal Data

We use your personal data:

- to provide the Goods to you that you have ordered
- to market our Goods and services to you, including contacting you electronically (e.g. by text or email) for this purpose
- to improve the Goods and services that we provide to you
- to improve your Website user experience (e.g. if you have registered an account with us, we remind you of the contact and purchase information from your previous purchases so you can easily select and reuse that same information)
- to bill you and to collect money that you owe us, including authorising and processing payment transactions (including credit card transactions) either directly or through our payment service provider
- to respond to communications from you, including a complaint
- to conduct research and statistical analysis on an anonymised basis
- to protect and/or enforce our legal rights and interests, including defending any claim
- for any other purpose authorised by you or the Act.

## Disclosing your Personal Data

Generally, we do not disclose your personal data to third parties. We may, however, disclose your personal data to:

- our service providers who support our business, our Website and/or the supply of our Goods, including our IT service providers to enable them to host or maintain any underlying IT system or data centre that we use to provide the Website.
- our payment service provider, for the purpose of processing, verifying or enforcing any payment made or payable by you;
- other third parties for anonymised statistical information
- a person who can require us to supply your personal data (e.g. a regulatory authority)
- any other person authorised by the Act or another law (e.g. a law enforcement agency)
- any other person authorised by you.

A service provider that supports our business, our Website and/or our Goods may be located outside Singapore. This may mean your personal data is held and processed outside Singapore. Further information is set out in this Privacy Policy under the section headed Overseas Transfer of Personal Data.

## Protecting your Personal Data

We take reasonable steps to keep your personal data safe from loss, unauthorised activity, and other misuse.

We require our service providers to undertake appropriate obligations of confidentiality before we grant them access to our systems.

## Accessing and Correcting your Personal Data

Subject to certain grounds for refusal set out in the Act, you have the right to access your readily retrievable personal data that we hold and to request a correction to your personal data. Before you exercise this right, we will need evidence to confirm that you are the individual to whom the personal data relates.

In respect of a request for correction, if we think the correction is reasonable and we are reasonably able to change the personal data, we will make the correction. If we do not make the correction, we will take reasonable steps to note on the personal data that you requested the correction.

Subject to certain continuing rights set out in the Act to collect, use or disclose personal data, you have the right to withdraw your consent to our collection, use or disclosure of your personal data for any reason.

If you want to exercise any of the above rights, email us at [support@urbanorigins.sg](mailto:support@urbanorigins.sg). Your email should provide evidence of who you are and set out the details of your request (e.g. the personal data, or the correction, that you are requesting, or the collection, use or disclosure for which you are withdrawing your consent).

Where we are allowed at law to do so, we may charge you our reasonable costs of providing to you copies of your personal data or correcting that information.

## Internet Use

While we take reasonable steps to maintain secure internet connections, if you provide us with personal data over the internet, the provision of that information is at your own risk.

If you follow a link on our Website to another site, the owner of that site will have its own privacy policy relating to your personal data. We suggest you review that site's privacy policy before you provide personal data.

We also collect technical information about users when they log on to, or visit the public version of, our Website. This includes information about the way users arrive at, browse through and interact with our Website. We use Google Analytics, a service provided by Google, to help us collect this information. We (and Google) may collect this type of technical information through the use of cookies, web beacons and other means. Cookies are alphanumeric identifiers that we transfer to your computer's hard drive to enable our systems to recognise your browser. Web beacons are objects embedded in web pages or emails that help us to identify if you have accessed certain content. If you want to disable cookies and web beacons, you may do so by changing the settings on your browser. However, if you do so, you may not be able to use all of the functions on the Website.

We use the technical information we collect to have a better understanding of the way people use our Website, the types of Goods that people purchase, and to improve the way the Website works and to personalise it to be more relevant and useful to your particular needs. We may also use this information to assist in making any advertising we display on the Website or any marketing we send to you more personalised and applicable to your interests.

## Marketing

Where you have opted via the Website to receive our regular updates, we will use your contact information to let you know about our Goods and services, specials, package deals, and related information, which we think you may be interested in, including contacting you electronically (e.g. by email or by text for this purpose). We currently use Sendinblue to send marketing information via email. You may unsubscribe from our mailing list for these updates by using the unsubscribe facility in the message.

## Overseas Transfer of Personal Data

We store personal data in secure servers in locations outside Singapore. Where we transfer personal data from Singapore to a location outside Singapore, we take

reasonable steps to ensure your personal data is given a comparable level of legal protection to that under the Act in Singapore. We also rely on third party service providers (including AWS) who also may store personal data outside Singapore. We, and our third party service providers, may access that personal data in those territories from time to time.

In addition, those third party service providers will collect, use, disclose and protect your personal data in accordance with the terms of their own privacy policies. Once you are redirected to a third party website or application, you will be governed by that third party's privacy policy and terms of use. We encourage you to read those privacy policies in order to understand more about how those service providers collect, use, disclose and protect your personal data.

See:

Sendinblue's privacy policy at <https://www.sendinblue.com/legal/privacypolicy/>

Google's privacy policy at <https://www.google.com/intl/en/policies/privacy/>

AWS's privacy policy at <https://aws.amazon.com/privacy/>