

Stemey Singapore's Data Protection Policy

March 1, 2020

This Data Protection Policy ("**Policy**") sets out the basis which Stemey (Singapore) Pte. Ltd. ("**Stemey Singapore**", "**we**", "**us**", or "**our**") may collect, use, disclose or otherwise process personal data of our customers, members and users of our website(s), online store and Singapore Centre in accordance with Singapore's Personal Data Protection Act ("**PDPA**"). This Policy 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.

PERSONAL DATA

As used in this Policy:

"**customer**", "**you**", "**your**" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and "**personal data**" means data, whether true or not, about a customer 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.

INFORMATION WE MAY OBTAIN

Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include:

- contact information, such as name, phone and fax number, and email and postal address;
- information used to create your account to access our websites and mobile applications ("**Sites**"), such as birth date, spouse's name, photo, preferred language, Enroller ID, Recommender ID, Sponsor ID, online password, NRIC number, passport, other identification number or information, or Tax ID number;
- payment information, such as name, billing address and payment card details, including card number, expiration date and security code, which is collected and stored by our third-party payment processor on our behalf;
- information you submit in connection with a career opportunity at Stemey Singapore, such as contact details, information in your resume (including work history, education, language skills, certifications/licenses and work eligibility status) and details about your current employment; and
- other personal information contained in content you submit to us, such as through the feedback feature, public forums or customer support tools on the Sites.

INFORMATION WE MAY OBTAIN BY AUTOMATED MEANS

When you interact with the Sites, we obtain certain information by automated means, such as cookies, web server logs, web beacons and other technologies. A “cookie” is a text file that websites sent to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s web browser or to store information or settings in the browser. A “web beacon” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server.

We may use these automated technologies to collect information about your equipment, browsing actions and usage patterns. The information we obtain in this manner may include your device IP address, other identifiers associated with your devices, web browser characteristics, device characteristics, language preferences, referring/exit pages, clickstream data, and dates and times of Site visits. These technologies help us (1) remember your information so that you will not have to re-enter it; (2) track and understand how you use and interact with our products, services and Sites; (3) tailor our products, services and Sites around your preferences; (4) measure the usability of our products, services and Sites and the effectiveness of our communications; and (5) otherwise manage and enhance our products, services and Sites.

Your web browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our Sites. For mobile devices, you can manage how your device and browser share certain device data by adjusting the privacy and security settings on your mobile device. To the extent required by applicable law, we will obtain your consent before using cookies or similar tools.

HOW WE USE THE INFORMATION WE OBTAIN

We may use the information we obtain about you to:

- provide our products and services to you;
- send promotional materials, newsletters and other communications about our products and services;
- establish and manage your account with Stemey Singapore;
- process and fulfil orders in connection with our products and services and keep you informed about the status of your order;
- identify and authenticate you so you may order our products and access and use the Sites;
- communicate about, and administer participation in, special events, programs, promotions, offers surveys, focus groups and market research;
- provide members and customer support and respond to enquiries;
- increase and maintain the safety and security of our products and services and prevent misuse;

- perform data analytics (including market research, trend analysis, financial analysis, and anonymization and aggregation of personal information);
- manage career opportunities, including for recruitment purposes, employee onboarding and other Human Resources purposes;
- operate, evaluate, develop, manage and improve our business and the Sites (including operating, administering, analyzing and improving our products, services and Sites; developing new products and services; managing and evaluating the effectiveness of our communications; performing accounting, auditing, billing reconciliation and collection activities and other internal functions);
- protect against, identify and prevent fraud and other criminal activity, claims and other liabilities; and
- comply with and enforce applicable legal requirements, relevant industry standards and policies, including this Policy and other Stemey Singapore terms of use and related documents.

We also may use the information we collect about you in other ways for which we provide specific notice at the time of collection and obtain your consent if required by applicable law.

We collect and retain your NRIC or passport number for tax reporting purposes as required by law. We may also inspect your NRIC or passport document or a copy thereof for identity verification purposes. Following identity verification, we will not retain any original NRIC or passport documents and will destroy and delete any copies which you may have provided to us.

THIRD-PARTY ANALYTICS SERVICES

We use third-party web analytics services on the Sites, including Google Analytics and Facebook Pixel. These service providers use automated technologies to collect data (such as IP addresses) to evaluate use of the Sites. To learn more about Google Analytics and how to opt out, please visit <https://www.google.com/intl/en/analytics/learn/privacy.html>. To learn more about Facebook Pixel and how to opt out, please visit https://www.facebook.com/help/164968693837950?helpref=faq_content.

ONLINE TRACKING AND INTEREST-BASED ADVERTISING

We may collect information about your online activities to provide you with advertising about products and services tailored to your interests. Where required by applicable law, we will obtain your consent for the processing of your personal information for direct marketing purposes.



You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users considering demographic data, users' inferred interests and browsing context. These networks track users' online activities over time by collecting information through automated means, including through the use of cookies, web server logs, web beacons and other similar technologies. The networks use this information to show ads that may be tailored to individuals' interests, to track users' browsers or devices across multiple websites or apps, and to build a profile of users' online browsing activities. The information our ad networks may collect includes data about users' visits to websites and apps that participate in the relevant ad networks, such as the pages or ads viewed and the actions taken on the websites or apps. This data collection takes place both on the Sites and on third-party websites and apps that participate in the ad networks. This process also helps us track the effectiveness of our marketing efforts.

INFORMATION SHARING

We do not sell or otherwise share personal information about you except as described in this Policy. We may share your personal information with (1) our affiliates and subsidiaries and (2) our service providers who perform services on our behalf, such as order fulfilment, customer support, payment processing and data analytics. We do not authorize our service providers to use or disclose the information except as necessary to perform services on our behalf or comply with legal requirements.

If you are an Stemey Singapore account holder, we also share your personal information with the account's sales organization (including upline and downline distributors) for the purpose of administering sales, distribution of Stemey products, and providing reports of activities to other Stemey account holders.

We also may disclose information about you (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) otherwise with your consent.

We reserve the right to transfer any information we have about you in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation).

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

Your Personal Data may be transferred to recipients in countries other than the country in which the data originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the data. However, we will

only transfer your Personal Data overseas if the recipient is bound by legally enforceable obligations to provide to the Personal Data transferred, a standard of protection that is comparable to that under the PDPA. In the event you would like to make any correction to the Personal Data or obtain information on such Personal Data in the possession or under the control of Stemey Singapore, please inform us in writing attention The Data Protection Officer at customerservice@stemey.sg

YOUR CHOICES

We offer you certain choices in connection with the personal information we obtain about you. To update your preferences, limit the communications you receive from us, or submit a request, please contact us at customerservice@stemey.sg. You also may make changes to the personal information used to create your account with Stemey Singapore by logging into your account.

As required by law, you may (1) have the right to access personal information in our possession or under our control; (2) request that we update or correct your personal information; (3) object to the processing of your personal information or withdraw your prior consent, if applicable; and (4) ask us to block or delete your personal information from our database. To exercise these rights, please contact us as at customerservice@stemey.sg. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

OTHER ONLINE SERVICES AND THIRD-PARTY FEATURES

The Sites may provide links to other online services for your convenience and information, and may include third-party features such as apps, tools, payment services, widgets and plug-ins (e.g., Facebook, Twitter, Instagram, YouTube and Pinterest buttons). These online services and third-party features may operate independently from us. The privacy practices of the relevant third parties, including details on the information they may collect about you, is subject to the privacy statements of these parties, which we strongly suggest you review. To the extent any linked online services or third-party features are not owned or controlled by us, Stemey Singapore is not responsible for these third parties' information practices.

WITHDRAWING YOUR CONSENT

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 in writing. You may withdraw consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

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.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 days for your withdrawal to be reflected in our systems. In the meantime, you may still receive marketing or promotional materials/communication from us.

While we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing at customerservice@stemey.sg.

Please note that your 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 and even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the Products and Services that you hold or have purchased from us.

ACCESS TO AND CORRECTION OF PERSONAL DATA

If you wish to make (a) an access request for access to a copy of (i) the personal data which we hold about you or (ii) information about the ways in which we use or disclose or have used or disclosed your personal data within a year before that date of the access request, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

HOW WE PROTECT PERSONAL INFORMATION

To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical security measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorized third-party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

CHILDREN'S PERSONAL INFORMATION

The Sites are designed for a general audience service and are not directed to children. Stemey Singapore does not knowingly collect or solicit personally identifiable information from children under the age of 13. If we learn that we have collected personal information from a child under age 13, we will promptly delete that information. If you believe that a child under age 13 may have provided us with personal information, please contact us at customerservice@stemey.sg

ACCURACY OF PERSONAL DATA

We generally rely on personal data provided by you (or your authorized representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.



UPDATES TO THIS DATA PROTECTION POLICY

This Policy may be updated periodically and without prior notice to you to reflect changes in our personal information practices. You may determine if any such revision has taken place by referring to the date at the top of this Policy on which it was last updated.

HOW TO CONTACT US

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Data Protection Officer
Stemey (Singapore) Pte Ltd
09-08 TripleOne Somerset
111 Somerset Road
Singapore 236184

tel +65 69777381
or through email at customerservice@stemey.sg