

## Privacy Policy

We respect the privacy of your personal information and we strive to maintain the confidentiality of your personal information given by you through our website and mobile application (app).

This Policy applies to all our website/app visitors or online service users.

1. We will safeguard all your personal information according to strict standards of security and confidentiality.
2. Only our authorised employees have access to your personal information.
3. We will not reveal your personal information to other unrelated parties or individuals. However, we may be required to disclose such information to regulators, lawyers, auditors, other companies in the same group, third party service providers, agents acting on our behalf, business alliance partners and referees given by you.
4. To offer a better service, we may work with other organisations to offer you other products and services. These companies will be required to comply with our privacy policy.
5. By giving us your telephone and facsimile numbers, and postal and email addresses, you are agreeing that DCS may contact you via these channels for communication and/or marketing purposes.
6. Similar to most websites and mobile applications, we may use cookies so that we can recall information about your preferences. You can modify your web browser/app setting to accept or reject these cookies.
7. We may amend or update this Privacy Policy from time to time. Where applicable, this Privacy Policy is to be read in conjunction with our standard terms and conditions. This Policy does not nor intend to create any contractual rights between DCS and the customer.

**IMPORTANT:** By accessing our website or all mobile applications (app) accepted or authorised by DCS Group (“DCS”) and any of its pages you are agreeing to the terms set out above.

### Data Protection Notice

DCS respects the privacy of all our customers and business contacts, and is committed to safeguarding the personal information you provide to us. This Privacy Policy explains how we collect, use, disclose and/or process (collectively, “process”) your personal data. By providing us with your personal data, you agree that we may process your personal data in accordance with the Personal Data Protection Act 2012 (“PDPA”), this Privacy Policy and any other terms, conditions and policies agreed to by you from time to time which relate to the processing of your personal data.

## **1. Application of Policy**

This Policy is based on the Singapore Personal Data Protection Act 2012 ("PDPA") and all the associated regulations and guidelines as may from time to time be issued by the Personal Data Protection Commission ("PDPC") of Singapore. In jurisdictions outside of Singapore, DCS practices may be subject to different or more restrictive local laws.

By visiting or using our website/app, you agree to the terms of this Privacy Policy. Please review this Privacy Policy carefully before visiting or using our website/app, or otherwise providing us with any of your personal data.

## **2. Collection on Personal Data**

### **Personal Data**

In this Privacy Policy, "personal data" means 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.

For the purpose of carrying on the DCS business, including registration and administration of DCS related products and services (including relevant online services), you may be requested to provide personal data such as, but not limited to, the following, without which it may not be possible to satisfy your request:

- a. Full Name;
- b. Residential Address;
- c. Copy of identity card (Singapore & PR) or Passport & Employment Pass (Foreigner);
- d. Payment details, including credit card and banking information;
- e. Contact details, including telephone number or email address;
- f. Employment information (Company's Name/Designation or Position/Date Join);
- g. Latest income documentation;
- h. Latest billing proof of address (where applicable);
- i. Information obtained from mobile device with your consent (e.g. device location and information)

You authorise DCS and our representatives to contact your bankers and any other source to obtain and verify any Personal Data about you as authorised or required by law.

### **Cookies**

We use cookies to provide visitors with a personalised experience on our website/app. Cookies are pieces of information that a website transfers to the memory or hard drive of a visitor's computer for record-keeping purposes. We use cookies to make improvements, and to better

tailor our website to our visitors' needs. We also use this information to verify that visitors meet the criteria required to process their requests.

When you visit our website/app, we may assign your computer/enabled device one or more "cookies." By accessing our website/app, you agree that we can place cookies on your computer/enabled device.

Most browsers used by visitors have options that allow the visitor to control whether the browser will accept cookies, reject cookies, or notify the visitor each time a cookie is sent. However, if you disable or refuse cookies, please note that some parts of our website/app may become inaccessible or not function properly. In addition, you can delete our cookies from your browser program at any time.

### **3. Consent Provided on Behalf of an Individual**

Where consent is provided by a person on behalf of an individual, DCSCC shall put in place reasonable measures to verify that such person is duly authorised and acting validly on behalf of the individual.

DCSCC reserves the right to request supporting information or documentation to establish the authority of the person providing consent, where necessary.

### **4. Use of Personal Data Collected**

You consent to the collection, use, disclosure and processing of your Personal Data and information relating to the Card Account and your use of the Card by us and any of our officers, employees, agents, contractors or service providers for any of the following purposes (collectively, the "Permitted Purposes"):

- a. processing your application for Card Account, services and products by us;
- b. account opening and operations relating to the Card Account, establishing or revising a Credit Limit and closing the Card Account;
- c. enrolling in and facilitating the provision of any Digital Payment Service;
- d. managing our business operations and complying with our internal policies and procedures;
- e. administrating loyalty and rewards programs (including the processing of redemption vouchers, benefits or entitlements);
- f. conducting checks with the Do Not Call Registry;
- g. providing services, Card benefits (e.g. vouchers), facilities and products offered by us to you;
- h. administrating or managing the relationship between you and us;
- i. carrying out your instructions or responding to any enquiries by you;

- j. conducting identity or credit checks;
- k. developing new services or products;
- l. providing you with marketing, advertising and promotional information, materials or documents we think may be of interest to you. We may disclose your Personal Data to business partners (such as co-branders) for use in developing and marketing offers to you. You have the right to opt out of receiving such marketing information. You can do so by writing to us, telephoning us or sending an e-mail to us at our address or number on the website. If you do not exercise your right to opt out of receiving such marketing information, you will be considered to have consented to the receiving of such marketing information and we may continue to provide such marketing information to you;
- m. complying with any law or the requirements of any regulatory authority. We reserve the right to collect, use or disclose your Personal Data if the collection, use or disclosure is required or authorised under any written law, even where you have exercised your right to withdraw your consent;
- n. seeking professional advice (including obtaining legal advice and facilitating dispute resolution);
- o. updating you on our products and services;
- p. advising an Establishment or other interested person the Card numbers of new, renewed, replaced or terminated Cards so that they can, amongst other things, process a Transaction or refuse to process a Transaction;
- q. processing any applications or requests for new products or services made by you;
- r. enforcing our rights against you;
- s. maintaining the safety and security of our premises with the use of security cameras;
- t. carrying out any proposed novation, assignment, transfer or sale of any of our rights or obligations with respect to the Card Account or any facilities and services available in association with the Card; and
- u. taking out an insurance policy which may provide coverage to you and some members of your immediate family.

We will not use, disclose or process your Personal Data for purposes which are not stated above or for which we have not obtained your consent. If we wish to use, disclose or process your Personal Data for another purpose we will seek your prior written consent.

## **5. Disclosure of Personal Data**

You consent to us collecting your personal data from our business partners and for such business partners to disclose your personal data to us for the purpose of managing and administering any benefits you may enjoy as our cardholder.

We may disclose your Personal Data for the Permitted Purposes to a related corporation (as defined in the Companies Act); any credit bureau of which we are a member or subscriber and/or to any other members, subscribers or compliance committee of the credit bureau; any other person to whom disclosure is permitted or required by any law; and our third party service providers and agents (including our lawyers). Those recipients may be located in or outside Singapore. Without limitation to the generality of the foregoing, we are not responsible for any breach of confidentiality by any third party provider of any service associated with an Enabled Device or Digital Payment Service.

Our rights here shall be in addition to and shall not affect nor limit any of our rights of disclosure available pursuant to any statutory provision and in law and nothing herein is to be construed as limiting any of those other rights.

## **6. Withdrawal of Consent**

- a. For direct marketing purposes:

You have the right to opt out of receiving such marketing information. You can do so by writing to us, telephoning us or sending an e-mail to us at our address or number on our website/app. If you do not exercise your right to opt out of receiving such marketing information, you will be considered to have consented to the receiving of such marketing information and we may continue to provide such marketing information to you.

- b. To collect, use, disclose or retain personal data:

If you do not wish us to use or disclose your Personal Data for any of the above purposes, you may withdraw your consent at any time by giving written notice to us pursuant to the Personal Data Protection Act 2012. However, depending on the circumstances and the nature or extent of your withdrawal, the withdrawal of your consent may result in us not being able to provide services to you and we may terminate the Card/app Account.

## **7. Access and Correction of Personal Data**

If you wish to access, update or otherwise change or remove any information that you provide to us, please contact us at: [pdpa@dcsc.com](mailto:pdpa@dcsc.com).

## **8. Accuracy of Personal Data**

DCS keeps personal data as accurate, complete and up-to-date as necessary, taking into account its use and the interests of our customers. Where possible, we will validate data provided using generally accepted practices and guidelines. This includes the requests to see original documentation before we may use the personal data such as with Personal Identifiers and/or proof of address.

If you believe that any information we hold about you is incorrect you should make a request for your personal data to be updated or corrected. Any information which we find to be incorrect will be corrected promptly.

## **9. Protection of Personal Data**

We take reasonable steps to protect your personal data using measures appropriate to the sensitivity of the personal data in our custody or control, which include safeguards to protect against unauthorised access and use. These measures include computer safeguards and secured files and buildings. Our authorised employees, agents and service providers who require access to your personal data to perform their obligations will have access to your personal data.

## **10. Retention of Personal Data**

DCS will retain your personal data only for as long as the purposes for which such data is collected or used (as notified to you) continues, or where necessary for our legal or business purposes. In some instances, we may continue to retain some of your personal data necessary to meet our legal obligations, such as retaining the information for tax and accounting purposes. Thereafter, DCS will delete or destroy the personal data, or remove the means by which the data can be associated with you.

## **11. Transfer of Personal Data Outside of Singapore**

We may transfer personal data to our affiliates outside of Singapore. We will take steps to ensure that your personal data is protected to at least the same standard as that in Singapore.

## **Changes to Policy**

We reserve the right to amend or update this Privacy Policy from time to time. The Effective Date, as stated above, indicates the last time this policy was revised. If we make material changes to the Privacy Policy, we will post any changes on this page. We encourage you to review this page periodically to understand our policy regarding the collection and use of your personal data.