

OUR POLICIES

Singapore

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Data Protection Notice

This Data Protection Notice (“Notice”) sets out the basis which **pixevety Pty Ltd** (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our customers 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.

Personal data

- As used in this Notice:

“**customer**” 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:

- from that data; or

- (b) from that data and other information to which we have or are likely to have access.
2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include:
- name
 - contact details
 - images within user galleries (e.g., digital photo or video)
 - key metadata relating to images (e.g., name or location of the person featured in an image)
 - facial recognition data (encrypted and Gallery specific)
 - other personal information you provide during the course of using the [pixevety](#) platform (e.g., your preferred privacy settings), or when you ask us to provide
 - additional services (e.g., inviting another person to have access to your Gallery)
 - personal information contained in documents or text files (other than images) that you choose open or share using the platform
 - account-related information (e.g., payment history)
 - web browsing information, such as that gathered by ‘cookies’
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

Collection, use and disclosure of personal data

4. We generally do not collect your personal data unless:
- (a) It is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “authorised representative”) after:
- (i) You (or your authorised representative) have been notified of the purposes for which the data is collected, and
 - (ii) You (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, **or**
- (b) Collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

We collect personal information when you:

- are a customer and you have set up an account with us
- are asked by an organisation to join its Gallery and you register with us to allow this
- add and manage your images on the [pixevety](#) platform
- pay us for your subscription to the [pixevety](#) platform
- ask us a question or make a complaint
- answer questions that we ask you (in order for us to assist you).

5. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (b) verifying your identity;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you managing your relationship with us;
 - (d) processing payment or credit transactions;
 - (e) sending you marketing information about our goods or services where you have agreed that you wish to receive these;
 - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (g) any other purposes for which you have provided the information;
 - (h) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
 - (i) any other incidental business purposes related to or in connection with the above.
6. We may disclose your personal data:
 - (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods or services requested by you; or
 - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in clause 5 above for us.
7. The purposes listed in the above clauses align with our [Terms](#) as set out on the [pixevely](#) platform, [portal.pixevely.com](#).

Withdrawing your consent

8. 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 ('Privacy Officer') at the contact details provided below.

post: Privacy Officer c/o PO Box 7056 Brookvale NSW Australia 2100	phone: 1300 438 389 +61 2 9194 0940	email: privacy@pixevety.com
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- 9. 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.
- 10. Whilst 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 in the manner described in clause 8 above.
- 11. Please note that 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.

Access to and correction of personal data

- 12. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, 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 ("Privacy Officer") at the contact details provided below.

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- 13. Alternatively, and where the option is easily available to you, you may access and correct your own personal data (as connected with your account with us) by using the functions available in the My Account section of the [pixevety](#) platform.
- 14. 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.
- 15. 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). If we are unable to provide access to your personal

data, we will preserve a complete and accurate copy of the requested personal data for a period of 30 days.

Protection of personal data

16. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical 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 authorised third party service providers and agents only on a need-to-know basis.
17. 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.
18. Additionally, we have implemented security measures to prevent the loss of any storage medium or device on which the personal data is stored.

Accuracy of personal data

19. We generally rely on personal data provided by you (or your authorised 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 ('Privacy Officer') in writing or via email at the contact details provided below.

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Transfers of personal data outside of Singapore

20. Our primary place of business is in AUSTRALIA and many of the service providers we use to support our business operations are also located here. As such, we may transfer your personal data to countries outside of Singapore through our normal course of business. Where we do so, we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

Data protection officer

21. 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, using the following means:

post: Privacy Officer c/o PO Box 7056 Brookvale NSW Australia 2100	phone: 1300 438 389 +61 2 9194 0940	email: privacy@pixevety.com
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Effect of notice and changes to notice

22. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
23. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date: 30.03.2020

Last revised: 3.02.2021