



**PERSONAL DATA AND PRIVACY POLICY
FOR CUSTOMERS**

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PERSONAL DATA AND PRIVACY POLICY



1 GENERAL

- 1.1 This Privacy Policy provides information on the obligations and policies of GYMMBOXX Pte. Ltd. We are absolutely committed to the protecting and respecting the confidentiality of your privacy.
- 1.2 This Privacy Policy applies to data collection, processing and usage arising from any goods or services are offered to you by or on behalf of GYMMBOXX Pte Ltd (collectively referred to as the “Company”, “we”, “us”, or “our”), or when you use the website “www.gymmboxx.com” (“Website”) or social media applications in compliance with its obligations under the Singapore’s Personal Data Protection Act 2012 (the “PDPA”).
- 1.3 By providing your personal data to us, whether you have provided such personal data through our website, over the phone, at our club, a smart phone or social media application, or otherwise, you agree to the collection, use and disclosure of that data in accordance with this Privacy Policy. If you do not consent to such collection, use or disclosure of your personal data, we may not be able to provide you with certain information, offers or products and services.
- 1.4 This Privacy Policy explains the key measures we have taken to implement the requirements of the Personal Data Protection Act 2012 (“PDPA”). It aims to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.
- 1.5 If you, at any time, have further queries on this policy, please do not hesitate to contact our Data Protection Officer (the “DPO”) at:

E-mail: enquiries@gymmboxx.com

2 PERSONAL DATA

- 2.1 For this Policy defined under the Personal Data Protection Act 2012 (“PDPA”):

“**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: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

- 2.2 Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, gender, identification numbers, residential address, contact information (including phone, mobile and email address), personal data of your emergency contacts, nationality, date of birth, medical records, photographs, fingerprints, video images through the use of closed-circuit television systems and bank account/credit card details or other payment information.

3 COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

- 3.1 We will collect your personal data (in accordance with the PDPA) 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 you (or your authorised representative) have been notified of the purposes for which your personal data is collected, used, disclosed and/or processed, and you (or your authorised representative) have provided written or verbal consent to the collection, use, disclosure and/or processing of your personal data for those intended purposes, or collection and use of personal data without consent is permitted or required by the PDPA or other laws.
- 3.2 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).
- 3.3 We may collect, use, disclose and/or process your personal data for any or all of the following purposes:
- (a) processing your application, registration of your membership and other services and products;
 - (b) verifying your identity for identification and club access;
 - (c) to verify if you are eligible for discounts, privileges, or benefits or other related purposes;
 - (d) using your credit card details or other payment method for processing payment purposes;
 - (e) the functioning of our club access terminal which requires registration of your biometric; the data will be processed to create encrypted biometric template and subsequently used for matching against the presented biometric sample used by our access control system.
 - (f) contacting you or communicating with you via phone/voice call, text message, email and/or postal mail for the purposes of our services, products, marketing, administering and/or managing your membership with us such as but not limited to communicating information to you related to:

- i. status of your membership;
 - ii. outstanding payments or membership fees;
 - iii. responding to, handling, and processing queries, requests, complaints, and feedback from you;
 - iv. informing you of new developments, promotions, club/facilities status updates, any changes to our policies or services which may affect you;
- (g) conducting research, analysis, and development activities to improve our services and facilities in order to enhance your membership with us or for your benefit, or to improve any of our products or services for your benefit;
- (h) 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;
- (i) any other purposes for which you have provided the information;
- (j) 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.

3.4 We respect the confidentiality of the personal data you have provided to us and will be kept confidential. We will not disclose your personal data to third parties without first obtaining your consent permitting us to do so but we may, where such disclosure is necessary without first obtaining your consent in certain situations, including, without limitation, to satisfy the purpose(s), or a directly related purpose, for which the data was collected, provide such information to the following:

- (a) where the disclosure is required, authorized personnel based on the applicable laws and/or regulations, provided they can prove their authority and/or written authorisation for any investigation or proceedings;
- (b) where the disclosure is necessary to respond to an emergency that threatens the life, health, or safety of yourself or another individual;
- (c) where such disclosure without your consent is permitted by the PDPA or by law; and
- (d) our third-party service providers, organisations, agents and/or our affiliates whether sited in Singapore or outside of Singapore. Such third-party service providers, organisations, agents and/or affiliates would be processing your personal data on our behalf. For example, payment processing, auditing, debt recovery and other services.

To the extent that these organisations and service providers gain access to your personal data, they will be made subject to confidentiality obligations which prohibit them from keeping this information or using this information for any other purpose, where required by the PDPA whether sited in Singapore or outside of Singapore.

4 WITHDRAWING YOUR CONSENT

- 4.1 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 collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing via email to our Data Protection Officer earlier provided or our online enquiry forms.
- 4.2 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.
- 4.3 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 7 above.
- 4.4 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.

5 ACCESS TO, UPDATING AND CORRECTION OF PERSONAL DATA

- 5.1 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 for example, if you change your email address, residential address or contact number, you may submit your request in writing via email to our Data Protection Officer earlier provided or our online enquiry forms.
- 5.2 Please note that a reasonable fee may be charged for the handling and processing of your access request. If so, we will inform you of the fee before processing your request.

We are not required to respond to or deal with your access request unless you have agreed to pay the fee.

- 5.3 We aim to respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. 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 fifteen (15) 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).

6 ADMINISTRATION, MANAGEMENT AND PROTECTION OF PERSONAL DATA

- 6.1 We are committed to keeping your personal data accurate and up to date. Therefore; if your personal data changes, please inform us of the change as soon as possible. We will not be responsible for relying on inaccurate or incomplete personal data arising from you not updating us of any changes in your personal data that you had initially provided us with.
- 6.2 We strive to take reasonable security arrangements to safeguard your personal data we collect from you and stored by us and/or our service providers such as having appropriate security measures on databases protected from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. We have introduced appropriate administrative, physical and technical measures such as the minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other reasonable security measures, securely erase storage media in devices before disposal, and web security measures against risks.
- 6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (b) retention is no longer necessary for any other legal or business purposes.
- 6.4 Only authorised staff can access your personal data only for approved purposes. We train our staff and require our data operators to respect the privacy and confidentiality of your information held by us. 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 our security measures to prevent unauthorised access, collection, or use of your data, we cannot be held responsible for any damages or liabilities, events arising from unauthorised access to your personal data to the fullest

extent permitted by law. Where required under law, we will notify you of any such loss, misuse or alteration of personal information that may affect you so that you can take the appropriate actions for the due protection of your rights.

7 ACCURACY OF PERSONAL DATA

- 7.1 Where possible, we will validate your personal data provided using generally accepted practices and guidelines. This includes the use of check sum verification on some numeric fields such as account numbers or credit card numbers. In some cases, we are able to validate your personal data provided against pre-existing data held by us. In some cases, we required to see original documentation before we may use the personal data such as with personal identifiers, identity cards and/or proof of address.
- 7.2 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 DPO in writing via email at the contact details earlier provided or our online enquiry forms.

8 RETENTION OF PERSONAL DATA

- 8.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, contractual obligations, or as required or permitted by applicable laws. Example law enforcement, financial audit, anti-fraud, and money laundering regulations.
- 8.2 We will cease to retain your personal data, anonymise, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected and is no longer necessary for legal or business purposes and the data is deleted from our electronic, manual, and other filing systems in accordance with our internal procedures and/or other agreements.

9 TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

- 9.1 We generally do not transfer your personal data to countries outside of Singapore. Where your personal data is to be transferred to servers located outside of Singapore, or other trusted third parties based in other countries, we will comply with the PDPA in doing so. In this regard, this includes us obtaining your consent unless an exception under the PDPA or law applies and taking appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the protection under the Act. This may include us entering into an

appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if the PDPA or law permits us to.

10 EFFECT OF NOTICE AND CHANGES TO NOTICE

- 10.1 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.
- 10.2 The Companies reserve the right to alter any of the clauses contained herein in compliance with local legislation, to meet its global policy requirements, and for any other purpose deemed necessary by us.
- 10.3 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 Website or our services constitutes your acknowledgement and acceptance of such changes.

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