

External Privacy Policy

Policy Statement

This Privacy Policy (the “**Policy**”) applies to the collection, use and disclosure of an individual client/customer’s Personal Data (hereinafter defined) arising from goods and/or services offered by Ovvly Pte Ltd. At Ovvly Pte Ltd (“Ovvly”), we respect the privacy and confidentiality of personal data and we are committed to protecting your privacy and safeguarding your personal data.

1. General

- 1.1 This Policy provides information on the obligations and policies of Ovvly in respect of an individual client/consumer’s Personal Data. Ovvly undertakes to use reasonable efforts in applying, where practicable, those principles and the processes set out in this Policy to its operations.
- 1.2 Ovvly’s management, staff and representatives shall use reasonable endeavours to respect the confidentiality of and keep safe all Personal Data collected, stored, disclosed and used. Ovvly shall use reasonable endeavours to ensure all collection, storage, disclosure and usage of Personal Data by it shall be done in an appropriate manner and in accordance with the Personal Data Protection Act and this Policy.
- 1.3 For the purposes of this Policy, in line with the provisions under the *Singapore Personal Data Protection Act 2012 (No. 26 of 2012)* (the “**Act**”), “**Personal Data**” shall mean data, whether true or not, about an individual who can be identified from that data; or from that data and other information which an organisation has or is likely to have access. Such Personal Data shall also refer to that which is already in the possession of Ovvly or that which shall be collected by Ovvly in future.

2. Statement of Practices

Managing the Collection, Use and Disclosure of Personal Data

- 2.1 **Obtaining Consent:** To the fullest extent required by the PDPA, before Ovvly collect, uses or discloses your personal data, you will be notified of the purpose why it is doing so. Ovvly next obtains written confirmation from you on your expressed consent. As far as possible, Ovvly will not collect more personal data than necessary for the stated purpose.

Under certain circumstances, Ovvly may assume deemed consent from you when you voluntarily provide your personal data for the stated purpose, e.g. when you submit your Personal Data for job engagement or dispute purposes.

- 2.2 **Third-Party Consent:** If you enter into a transaction with Ovvly, the engaged merchants and/or their appointed representatives on behalf of another individual, you must first obtain consent from that individual in order for Ovvly to collect, use or disclose his/her personal data.

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- 2.3 **Withdrawal of Consent:** If you wish to withdraw consent, you should give Ovvly reasonable advance notice. You have to be aware, though, of the likely consequences of your withdrawal of consent, e.g. without your personal contact information Ovvly may not be able to inform you of future services offered by us or our clients. Your request for withdrawal of consent can take the form of an email or letter to Ovvly. Refer to clause 12 for more information.

Types of Personal Data Collected

- 2.4 As part of its day-to-day activities, Ovvly may collect from data subjects, through various means, including *via* referrals, introducers, roadshows, seminars, meetings, cookies, personal networks and social media, and any modes of communications and forms (e.g. survey forms, feedback forms) used by Ovvly from time to time, the following Personal Data (but not limited to):

- Your personal information such as full name, **last 3 digits and letter** of NRIC/passport, residential address, work address, e-mail address, telephone number, mobile phone number, date of birth, gender, dependants' details necessary to fulfil special requests such as bereavement, emergency contact information, bank account/credit card details, photographs and images, etc.
- Your personal government-issued identification document numbers such as NRIC/FIN/Work Permit/birth certificate and passport numbers; only when **required** under the law or **necessary** to accurately establish or **verify** your identity to a high degree of fidelity.
- Other personal details which are exchanged using our chat system built within the Application ("Chat Messages").
- Other personal details not above-mentioned (where relevant) provided by you when Ovvly intervention is required for job engagement or dispute resolution matters.
- When you log in to the Application via social media, information relating to your social media profile which includes but may not be limited to the data of your social media friends.
- Ovvly may also collect non-personally identifiable information about you, such as use of our website, internet protocol addresses, browser and computer system information, cookies, invisible pixels, web beacons, and aggregated data related to your use of our Platforms.

If you consent to us obtaining your personal information through third-party service providers designated by us, we shall obtain your personal information as per the above-mentioned including any information registered by you with the third party through such third-party service providers. Further, you agree to give Ovvly the consent to use and store your data in a manner consistent with this Privacy Policy.

Should you require more details on the types of personal data we collect about you, you may visit our website: <https://ovvyapp.com/> or contact our Data Protection Officer, Ms Sharon Loh (the "DPO") of Ovvly at contact@ovvyapp.com.

Tracking of User Activity

Where we track user activity, we will document this in our data inventory, and disclose such activity in our External Privacy Notice.

Cookies

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Ovvy uses “cookies” on our websites to track website visitorship, activity and experience. Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive, and most web browsers are designed to accept cookies. If you do not wish to receive any cookies, you may instruct your browser to refuse all cookies or to indicate when a cookie is being sent but this may prevent you from taking full advantage of our website.

Purpose of Collection of Personal Data

2.5 The Personal Data mentioned in Paragraph 2.4 is collected for the following purposes:

- Process job applications, recruitment and selection;
- Customer Care and account management;
- Prospecting for potential clients through various channels stated in Paragraph 2.4;
- Fact-finding;
- Completion of a transaction;
- Process facilities booking;
- Keeping clients informed of promotions or new opportunities that may be relevant to them;
- Administration and servicing of a membership program;
- Analyse website visitors;
- Market research and analysis (using anonymised data);
- Carry out our obligations arising from any contracts entered into between you and us; and
- Comply with legal obligations and regulatory requirements;
- Detection and/or prevention of fraudulent transactions;
- Communicate with enquirers and analyse website visitors;
- Notify you about our services, special events and programs;
- Respond to enquiries, update requests and feedback on user experience;

Disclosure of Personal Data

2.6 In order to carry out the functions described above, Ovvy may, from time to time, disclose your Personal Data to third parties.

2.7 Without derogating from any of the above, Ovvy may also disclose your Personal Data to the following third parties:

- Regulators and law enforcement officials e.g. Strata Title Board, Small Claims Tribunal, Building & Construction Authority, Council for Estate Agencies, Singapore Police Force;
- Government agencies e.g. Ministry of Manpower, Ministry of Health, etc;
- External advisors e.g. lawyers, auditors and accountants;
- Insurance companies;
- Third-party service providers and consultants e.g. IT/Technical Support/ IT service providers, including but not limited to web hosting companies and cloud service providers;
- Credit, debit and charge card companies, banks and other entities processing payment;
- Any vendor fulfilling its contractual obligation and carrying out the provision of its services in line with job engagement; and

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- Any agent or subcontractor acting on Ovvly's behalf to assist in its internal company operations (e.g. Recruitment Agencies / Head hunters, Commercial Service and Training Providers).

2.8 While Ovvly will only share your data with authorised persons on a 'need to know basis', Ovvly may disclose your Personal Data to the abovementioned parties also in the occurrence of any of the following events:

- To the extent that Ovvly is required to do so by the law;
- In connection with any legal proceedings or prospective legal proceedings;
- To establish, exercise or defend Ovvly's legal rights;
- To any person and/or entity for the purpose of processing such information on Ovvly's behalf;
- To third parties who provide services to Ovvly's or on its behalf;
- With your consent; and
- For the purposes of disaster recovery.

Optional Provision of Personal Data

2.9 In some instances, you may also be requested to provide certain Personal Data that may be used to better tailor the type of information presented to you. In most cases, this type of data is optional although, where the requested service is a personalised service, or the provision of a service is dependent on your providing all requested data, failure to provide the requested data may prevent Ovvly from providing the service. This type of data includes, but is not limited to:

- Lifestyle, hobbies and leisure activities
- Family and household demographics

2.10 Under certain circumstances, telephone calls made to any of Ovvly's service hotlines or inquiry telephone numbers will be recorded for the purposes of quality control, staff management and development. In such an event, by agreeing to this Policy, you hereby give your clear and unambiguous consent for the collection, use and disclosure of such Personal Data in accordance with this Policy.

3. Transfer of Personal Data Overseas

3.1 Your Personal Data may be processed by Ovvly and third parties providing services to the Company or yourself in jurisdictions outside of Singapore. If there is a need for Ovvly to transfer your personal data to another country, Ovvly will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA.

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4. Accuracy of Personal Data

- 4.1 Where possible, Ovvly will validate the data provided and take reasonable precautions using generally accepted practices and guidelines and verification checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. This includes the use of checksum verification on some numeric fields such as account numbers or credit card numbers. In some instances, Ovvly is able to validate the data provided against pre-existing data held by it. In some cases, Ovvly is required to see original documentation before we may use the Personal Data such as with Personal Identifiers and/or proof of address.

To assist in ensuring the accuracy of your Personal Data in the possession of Ovvly, please inform us of any updates on any parts of your Personal Data by sending a clearly worded email to the Data Protection Officer (DPO) at the email address provided in Paragraph 2.4. Further, Ovvly may, from time to time, conduct a verification exercise with you to update it on any changes to your Personal Data.

5. Protection of Personal Data

- 5.1 Ovvly uses commercially reasonable physical, administrative and technical safeguards to protect and maintain the confidentiality and integrity of your Personal Data and will not knowingly allow unauthorised access, use, disclosure or otherwise to this data to anyone outside the Company, other than to you or as described in this Policy.

External Data Intermediaries who process and maintain your personal data on our behalf will be bound by contractual information security arrangements we have with them.

6. Access and Correction of Personal Data

- 6.1 In accordance with the Act, you have the right to:
- a) check whether Ovvly holds any Personal Data relating to you and if so, obtain copies of such data; and
 - b) require Ovvly to correct any Personal Data relating to you which is inaccurate for the purpose for which it is being used.
- 6.2 Ovvly reserves the right to charge a reasonable administrative fee in order to meet your requests under Clause 6.1(a). Upon payment of the requisite fee under Clause 6.1(a) and/or receipt of your request under Clause 6.1(b).
- 6.3 If you wish to verify the details you have submitted to Ovvly or if you wish to check on the manner in which Ovvly uses and processes your personal data, Ovvly's security procedures mean that it may request proof of identity before revealing any information. This proof of

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identity will take the form of full details of name, contact number and NRIC or Passport or FIN number. You must therefore keep this information safe as you will be responsible for any action which Ovvly takes in response to a request from someone using your details.

7. Storage and Retention of Personal Data

- 7.1 Ovvly will delete, as reasonably possible, or otherwise anonymise any Personal Data in the event that the original purpose has been fulfilled or it is not required for any reasonable business or legal purposes of the Company. The Personal Data will be deleted from Ovvly's electronic, manual, and other filing systems in accordance with its internal policies and procedures and/or other agreements. Based on our Document Retention Policy, we will ensure that your personal data that is no longer needed by us will be destroyed or disposed of in a secure manner.

8. Contacting you

- 8.1 To the extent that any of the communication means which you have provided Ovvly with (which may include your telephone number and fax number) is/will be listed on the Do Not Call Registry (the "DNC"), by proceeding with the use of this website and Application, or by any other means of indication, you hereby grant Ovvly your clear and unambiguous consent to contact you using all of your communication means you have provided to Ovvly, including via voice calls, SMS, WhatsApp, MMS, fax or other similar communications applications or methods, for the purposes as stated in Paragraph 2.5.

9. Change of Policy

- 9.1 Ovvly reserves the right to alter any of the clauses contained in this Policy in compliance with local legislation and/or to meet its global policy requirements, and for any other purpose deemed reasonably necessary by Ovvly. You should revisit this page periodically for any changes. Changes to this policy are effective when they are posted on this page. If you do not agree to the modified terms, you should inform Ovvly as soon as possible of the terms to which you do not consent. Please be informed that your continued use of this website and Application constitutes your consent to the changes, and where there is any inconsistency between these terms and the additional terms, the additional terms will prevail to the extent of the inconsistency.

10. Governing Law

- 10.1 This Policy is governed by and shall be construed in accordance with the laws of Singapore. You hereby submit to the non-exclusive jurisdiction of the Singapore courts.

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11. Miscellaneous

- 11.1 This Policy only applies to the collection and use of Personal Data by Ovvly. It does not cover third-party sites to which Ovvly may provide links. Ovvly does not share your Personal Data with third-party websites. Ovvly is not responsible for the privacy and conduct practices of these third-party websites. It is important that you review the Privacy Policy of every website that you visit. Ovvly has no control over and is unable to assume any responsibility for, the content, privacy policies or practices of any third-party websites or services.
- 11.2 Ovvly will not sell your personal information to any third party without your permission, but it cannot be responsible or held liable for the actions of third-party sites to which you may have linked or been directed to Ovvly's website.

12. Contacting the Data Protection Officer

- 12.1 You may write into Ovvly, based on reasonable grounds, to request access to and/or correction of Personal Data relating to you, such Personal Data which is in the possession and control of Ovvly, Ovvly shall provide and/or correct that data in a reasonable time and manner in accordance with its standard procedures as stated in this Policy.
- 12.2 In accordance with the Personal Data Protection Act, Ovvly has established a process for receiving and responding to any query or complaint that may arise with respect to the application of this Act. To ensure that Ovvly receives your complaints and enquiries, please send the same *via* email to the DPO at contact@ovvyapp.com.
- 12.3 The consent which you provided to Ovvly for the collection, use and disclosure of your Personal Data remains valid until we receive written notification of your request to withdraw consent.

Should you not wish for Ovvly to use your Personal Data for any of the purposes listed above, you may withdraw consent for our use of your personal data for such purpose by sending an email to contact@ovvyapp.com.

Please be advised that we will not be able to provide you with the services and/or membership benefits that you requested or have with us if you withdraw consent.

To ensure that you are able to continue to enjoy your privileges and/or allow us to continue serving you, you may first contact Ovvly to understand more.

In relation to the above, kindly note that any withdrawal of consent does not apply to situations where the collection, use and disclosure of Personal Data without consent is permitted or required under applicable laws.

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Ovvy treats all such queries and complaints seriously and will deal with them confidentially and within a reasonable time.

While Ovvy endeavours to fulfil your request within 30 days, please note that a fee may be charged for facilitation depending on the specific request, which we will advise accordingly. If we are unable to do so within 30 days, we will notify you of the additional time with an estimate of the fee, if required.

Deletion of Ovvy Account

You may send in your request to delete your Ovvy account at any time. Please refer above if the request is pertaining to Access, Correction or Withdrawal of Consent concerning personal data.

By deleting your account, it also means that you are terminating account usage – you will not be able to recover the account and information subsequently if you change your mind. Consequently, Ovvy will no longer be able to continue providing our services and privileges extended especially to our Ovvy users including subscriptions and contents, if any, once your account has been deleted.

Once Ovvy receives your Account Deletion request, we will review it and provide you with an email confirmation within 5 working days. Any feedback and/or suggestions are greatly welcomed for us to continue improving our services so we may serve you again in the future.

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