

# **SPORTSHUB'S DATA PROTECTION PRIVACY POLICY**

## **(1) Data Protection Privacy Policy**

- a) SportsHub Pte Ltd (“SportsHub” or “We” or “Us” or “Our”) recognises the importance and sensitivity of any personal data we may collect from you from time to time and are committed to protect your privacy and to process your data in accordance with the Singapore Personal Data Protection Act (No. 26 of 2012) (the “PDPA”) and any other relevant legislation.
- b) Please read this Data Protection Privacy Policy (“Policy”) carefully to ensure that you are aware of and understand what data we may collect from you, how we may use that data, how you can get in touch with us if you wish to limit our use of that data and more generally of the steps we take to protect your privacy.
- c) References in this Policy to our partners, include our strategic partners, hirers, promoters, affiliates, agents, third party service providers and other related third parties from time to time.

## **(2) Access to other websites**

- a) The SportsHub and the website: <http://singapore7s.sg> may contain links to other external websites, for example links from our partners and advertisers.
- b) We are not responsible for the privacy practices, contents or security arrangements of those websites and recommend that you check the privacy and security policies of these organisations.

## **(3) What is personal data?**

- a) Personal data is data, whether true or not, about you, from which you can be identified either on its own or together with and other information to which we have or are likely to have access.
- b) However, please note that the PDPA imposes no specific requirements in relation to our handling of data which relates to your business contact information, such as your business position and business contact details, where you have provided such information to us not only for personal purposes.
- c) If you provide us with personal data about another person, you confirm that they have appointed you to act for them, to consent to the processing of their personal data and that you have informed them of our identity and the purposes (as set out below) for which their personal data will be processed.

## **(4) Examples of personal data we may collect**

- a) The type of personal data we may collect from you for the purposes of administering any registration you have opted to take and for market surveys or research purposes may include the following: first name, last name, username, password, gender, date of birth or age, postal address, contact number, e-mail address or other identification information, city of birth and nationality, where applicable.
- b) Financial Information: We may also collect certain financial information such as bank account, credit card details and other payment information for payment processing purposes when you purchase products and/or services from us.
- c) Purchase Information: we will collect data pertaining to product/services purchased such as location of purchase; time of purchase; frequency of purchase; rewards earned and redeemed and so forth.

- d) **Membership Card Information:** we will collect data such as card number; card transaction; loading value; redeeming value; balance value and so forth.
- e) **Mobile Applications Information:** we will collect data such as your device ID; device location and so forth.
- f) **Internet Information:** we may automatically collect information relating to your use of our website(s) and services, including but not limited to your internet service provider; operating systems; computer browser information; domain names; IP addresses; access times; pages visited and so forth. We may further collect aggregated data or anonymised data that does not directly identify individuals.

**(5) How we collect and use your personal data:**

**a) *Products and services purchases***

We may collect information from you in order to provide you with better personalised services in relation to ticket bookings and other associated products and services you have selected to receive or enquired about. In doing so, we will only collect personal data that we consider reasonably necessary to achieve these purposes, such as:

- i. processing and managing your purchases;
- ii. responding to or taking other actions in response to your enquiries;
- iii. communicating event information and updates in relation to any tickets you have purchased;
- iv. delivering any products, information or other services that you may have ordered from us;
- v. administering your feedback and using it to improve our services;
- vi. to conduct market research, statistical analysis and surveys;
- vii. combining your data with information received from other sources and analysing it to further tailor our products, services and site contents to suit our patrons' interests, and for market survey and research purposes; and
- viii. monitoring and recording communications with you to make sure that we follow your instructions correctly and improve our services to you through training our staff.

**(b) *Optional services***

We may also collect your data if you have indicated that you would like to sign up for any of our optional services, such as:

- i. registering for our newsletters, alerts, loyalty or membership programmes;
- ii. applying to participate in our promotions, contests, competitions, sweepstakes and lucky draws;
- iii. signing up to receive information on shows, events, activities, and promotions taking place at the SportsHub and/or other venues in Singapore; and
- iv. registering with us, participating to our surveys, and/or sending us any enquiries or messages (including, complaints, comments and other feedback), via our website(s) or otherwise.

**(c) *Automatic collection***

We also collect statistical or behavioural data from time to time which is stored for analytical purposes. This is not personal data as it is anonymous in nature and does not reveal your personal identity. Information of this nature includes but is not limited to:

- i. site visit information: server address, date and time of visit, pages accessed, information downloaded, type of browser used;
- ii. cookies: Cookies are small data files that a website can place on your computer hard drives and which record certain technical information about your internet usage. SportsHub uses cookies on certain pages of its websites to help improve and enhance customer experience, including but not limited to detect your web browser's multimedia capabilities, to track promotional advertisements, to maintain current login and purchase information on secure portions of the sites and to provide a unique identifier to your computer so that SportsHub can generate statistics regarding the site usage. The unique information is not matched with any personal data. Most cookies are "session cookies" meaning that they are automatically deleted from your hard drive at the end of a session. You always have the option to decline cookies (if your browser permits you to do so), although in that case, you may not be able to use certain features on our websites and may be required to enter your password more frequently during a session on the sites; and
- iii. web beacons: these are electronic images that may be used on our website(s) or in SportsHub's e-mails to deliver cookies, count visits, understand usage and campaign effectiveness and to let us know which emails and links have been opened and what action has been taken in relation to those.

**(6) Disclosing and transferring your personal data, in Singapore and overseas**

- a) We engage external partners to perform various functions for and on our behalf, such as marketing services, events promotion and sponsoring, ticketing and sales services, as well as information and communication technology services. Accordingly, we will share your data with our partners to the extent necessary to administer any products or services you have chosen to receive from us, as well as for market research and survey purposes.
- b) Where we collect your personal data in connection with events organized by our external partners (e.g. when you purchase tickets through our website for an event organized our external partner), we may disclose such data to our partners to enable them to administer said events and, to the extent that you have consented to them doing so, for them to send you information and updates on their other events or promotions (which may take place in the Singapore Sportshub or other venues in Singapore, whether or not operated by Sportshub) via your preferred mode of communication.
- c) We will not share or disclose your personal data to any other third parties (whether for marketing purposes or otherwise) without your consent, save as otherwise required or permitted by law.
- d) Please note that the partners (and, with your consent, any other third parties) to whom we disclose your information may transfer it to countries outside Singapore. Where this is the case, we will comply with our obligations under the PDPA and either seek your consent or take appropriate steps (unless we are deemed to have taken such appropriate steps under the PDPA) to ensure that the recipients of your personal data outside Singapore are bound by legally enforceable obligations to provide a standard of protection to your personal data comparable to the protection provided by the PDPA and other applicable legislation.

**(7) Protecting your data**

- a) SportsHub uses industry standards efforts to protect the confidentiality of your personal data, storing data on secure servers and taking other security measures to prevent unauthorised access, collection, use, disclosure, copying modification, disposal or similar risks in relation to your data. We regularly review developments in relation to security and encryption technologies.

- b) However, you will realise that no data transmission over the internet can be guaranteed as totally secure and therefore, unfortunately, we cannot ensure or warrant the total security of any information transmitted from our online products or services.

**(8) Accuracy of personal data**

(a) We will take reasonable efforts to ensure that your personal data is accurate and complete when we disclose it to our partners and if we disclose it to other third parties in accordance with this Policy or if it is likely to be used by us to make a decision affecting you.

(b) Please note that, in most circumstances, we will presume that personal data directly provided from you will be accurate and complete. However, depending on the circumstances, we may decide to contact you to ensure that this is the case or to ask that you verify that the data we hold in relation to you is up to date.

**(9) Retention of personal data**

- a) We will only hold your personal data for as long as required for the purposes for which it was collected or as otherwise required or permitted by law.
- b) We will regularly review and assess whether personal data can legitimately be retained, having regard to the purpose for which it was collected and any other legal or business purposes for which retention may be necessary.
- c) Where we are satisfied that we no longer need to retain your personal data, we will take prompt action to ensure that we will no longer hold on to it, either by destroying or removing your data from our systems, files and other records completely and permanently or by removing any identifying information so that it has become anonymised.

**(10) Request to access and correct your personal data**

**a) Access to personal data**

- i. You may request access to what personal data we hold in relation to you, as well as information about how we may have used or disclosed your personal data to third parties in the past twelve months, save where we are not required to do so by law (for example, where doing so would necessarily reveal personal data about other individuals, where investigations or proceedings are ongoing or where this would threaten other individuals' health or safety).
- ii. We will carefully review any data access request we receive from you. Please note that we may decide to reject your request if we have determined that the burden or expense of providing it would be unreasonable to us or disproportionate to your interests, if your request concerns information that is trivial, does not exist or cannot be found or it otherwise frivolous or vexatious. Accordingly, when making any data access request from us, we recommend that you set out the circumstances and reasons for your request in as much detail as possible to enable us to properly assess the matter.
- iii. Please note that we expressly reserves the right to charge an administrative fee in relation to any request you make to access personal data we hold and/or have disclosed to third parties in relation to you in the past twelve (12) months. If we decide to do so, we will inform you of the fee we will charge in relation to your request beforehand and we will only proceed once we have received confirmation from you to that effect.

**(b) Correction of personal data**

You may also request that we correct any errors or omissions with regards to your personal data and if so, we will normally ensure that this is made as soon as practicable, save where we are satisfied on reasonable grounds that such correction should not be made or where we are not required to do so by law.

**(c) *Timing of response to data access and correction requests***

- i. We will endeavour to respond to your data access and/or correction requests, where applicable, within thirty (30) days of your request.
- ii. Where we are unable to do so, we will, within that timeframe, inform you of this and of the reason(s) for our delay and we will give you an estimated timeframe for our response.
- iii. In the event where a request is received via e-mail, the identity of the person making the request shall be verified by SportsHub before proceeding to make the correction.

**(11) *Withdrawing consent***

**(a) *Withdrawing consent for the collection, use and disclosure of personal data***

- i. You may withdraw your consent to us and/or our partners collecting, using and/or disclosing your personal data at any time by contacting our Data Protection Officer (see below).
- ii. We will inform you of the likely consequences of us doing so. We will also inform our partners of your request and will ensure that we and our partners comply with your request, save where otherwise permitted or required by law. Please note that we will then delete and personal data we hold about you in accordance with the retention principles set out in this Policy.

**(b) *Withdrawing consent to receive marketing updates***

- i. If you had previously subscribed to receive information on shows, events, activities and promotions taking place at the SportsHub from us or our partners and no longer wish to be on our or our partners' mailing lists, you may unsubscribe at any time by clicking on the "unsubscribe link" or by contacting our Data Protection Officer (see below).
- ii. If you had previously indicated that you wished to receive information on shows, events, activities, and promotions taking place at other Singapore venues from our partners and you no longer wish to receive such information from them, you will need to get in touch with our partners directly to let them know, either by visiting the privacy policy of their website(s) or by responding to any unsubscribe links to marketing materials which they will be sending you.

**(12) *Individual Rights for Users in the European Economic Area***

- a) If you are located in the European Economic Area, you may seek confirmation regarding whether SportsHub is processing your personal data, request access to your personal data and ask that we correct, amend, delete, or restrict processing of your personal data. In addition, you may object to SportsHub's processing of your personal data at any time. However, please note that doing so may impact your ability to access and use SportsHub's facilities, sites, and/or services.
- b) While SportsHub will make reasonable efforts to provide you with access to your personal data, there may be circumstances in which we are unable to provide such access, including but not limited to: where the information in question is legally privileged, would compromise the privacy or other legitimate rights of other persons, where the burden or expense of providing access would be disproportionate to the risks to your privacy, where the request is clearly

excessive or unfounded, or where the information requested comprises proprietary business information.

**(13) Website use by minors**

Please note that if you are below the age of thirteen (13), you are not permitted to use our website or give us any information about you without the supervision of your parent or legal guardian.

**(14) Contact our Data Protection Officer**

If you have any queries or comments about this Policy or your personal data dealings with any of the SportsHub website(s), wish to stop receiving our marketing updates, or wish to access or update the information we hold about you, please contact our Data Protection Officer:

by post at:

Data Protection Officer  
SportsHub Pte. Ltd  
1 Stadium Drive  
#02-01 National Stadium  
Singapore 397629

or by e-mail at: [dpo@sportshub.com.sg](mailto:dpo@sportshub.com.sg)

**(15) Changes to this Policy**

- a) SportsHub hereby expressly reserves all rights to update, modify, or change this Policy from time to time.
- b) Any update, modification or change will be posted on this page and take effect on the date stipulated above.
- c) We recommend that you check this Policy periodically to review the latest version.