

Version: <b>2.1</b>	Revision Date: <b>03-October-25</b>	Effective Date: <b>01-April-13</b>	
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# Personal Data Protection Policy (PDPA POLICY)

	<p><b>MISSION STATEMENT</b></p> <p>To be a market leading retailer offering customers superior value and experience by providing affordable home and technology solutions.</p>
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## 1. PERSONAL DATA PROTECTION ACT

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### 1.1 Personal Data Protection Act and Its Objectives

The Personal Data Protection Act 2012 (hereinafter referred to as the “PDPA”) was first enacted in 2012 and revised in 2020. This fundamental law establishes minimum standards for the collection, use, disclosure, and protection of personal data of individuals. The objectives of the PDPA are to safeguard individual’s personal data in era of pervasive technology, grant consumers greater control over how their personal data is used, and bolster Singapore’s standing as a trusted, global hub for data management, thereby promoting trust in businesses.

We, Courts Singapore Pte Ltd (hereinafter referred to as “Courts”), respect your privacy and recognise the importance of the personal data you have entrusted to us. We recognise that your personal data is utmost important to us, and we believe that it is our responsibility and commitment to properly manage, protect, and process your personal data and we wish to assure you that we treat your personal data seriously.

In compliance with the PDPA, we have implemented our Personal Data Protection Policy (hereinafter referred to as the “PDPA Policy”). This PDPA Policy aims to help you understand the types of personal data that we collected and processed, the purpose for which it is used, and how we handle, collect, use, disclosure and process your personal data, with whom we share your personal date and how we protect your personal data.

By voluntarily providing your personal data to us, you acknowledge and agree that you have fully read, understood and consent to the collection, use, processing, and disclosure of your personal data as described in this PDPA Policy.

Without prejudice to any of the foregoing, if you provide the personal data of any other third party to us, you warrant and agree that such third party has fully read, understood and consented to you disclosing their personal data to us for the purposes outlines in this PDPA Policy.

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## 1.2 Definition

- Data** means any recorded information whether store electronically, on a computer, or in certain paper-based filing systems;
- Data Processors/ Intermediary** means any person who processes the data on behalf of a data controller. Employees of the data controllers are excluded from this definition, but it could include third parties which handle the data on behalf of Courts;
- Personal Data** means data, whether true or not, about an individual who can be identified from that data or from that data and other information to which we have or may have access to;
- Processing** means any activity that involves use of the data. It includes carrying out of any operation or set of operations on the data including recording, holding, organising, adapting, altering, amending, retrieving, combining, using, disclosing, transmitting, erasing, or destroying; and
- Individual** Means a natural person, whether living or deceased.

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## 2. COURTS MEASURES FOR COMPLIANCE

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### 2.1 Types of Personal Data We Collect

**2.1.1** In compliance to the PDPA, COURTS will only collect your personal data in a lawful manner and when we have a valid reason to do so. We may collect your personal data under various platforms and sources, including but not limited to when you use our website(s) or mobile application(s); memberships sign up or create account on our platforms; apply for jobs; apply for any products, facilities, subscription and/or installment plan, or any other services from us; business dealings or transactions with us; submit forms; subscribe to our communications or publications; participate in contest on any competition or promotion offered by us; provide feedbacks; complete surveys; and/or through any other interactions, communications, application and services you have with us.

**2.1.2** Personal Data which we may collect include: -

- a) Identity and Contact Data:** such as your name, addresses, telephone number, fax number, date of birth, gender, photographs, videos, voice, email address, country of nationality or residence, national identification number (NRIC/FIN), passport number, specimen signature(s), biometrics data, marital status, next of kin, employment history, educational background, professional qualifications, job title and function;
- b) Financial and Payment Data:** such as your bank account details, proof of income, asset's liability and ownership, contribution to the Central Provident Fund, financial details, credit report, credit/debit card details and other related billing or payment information;
- c) Business Information and Contact:** such as information provided in the course of our contractual relationship with you or your organisation, or otherwise voluntarily provided by you or your organization, including Identity and Contact Data of your organisation and your dedicated officer;

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- d) **Claims Information and Complaints:** including any personal data such as photographs, statements or voice/audio recordings provided in the course of any investigations that Courts may need to undertake, or, any customer service requests you may raise or complaints to us;
  - e) **Legal Proceedings and Enforcement:** in connection with any claims, actions or proceedings (including but not limited to drafting and reviewing documents, transaction documentation, obtaining legal advice, and facilitating dispute resolution), and/or protecting and enforcing our contractual and legal rights and obligations;
  - f) **Profile, Usage and Technical Data:** such as your preference in receiving marketing communications from Courts, your communication preferences, information about how you use the Platforms, information about your device, IP address, login data, application, transaction, account data, browser type and version, device type and any other personal data concerning your preferences and habits which may be relevant to the products, facilities and/or services that Courts (or any one of its members) provides;
  - g) **Physical Access Data:** such as information provided when you visit our retail and captured on our closed-circuit television (“CCTV”) devices or your photographs or videos taken by us or our representatives when you attended our events hosted by us or by our representatives or agents;
  - h) **Marketing Data:** any other data which we may need to collect, depending on the specific contest, event, campaign, form, feature introduced by Courts or any services that you use or request; and
  - i) **Data from Third Party:** any personal data we receive from any other third-party sources, provided it is permitted by applicable law, including but not limited to any public sources, our business partners, credit reference/bureaus, debt collection and fraud prevention agencies, and other data aggregators.

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### **2.1.3 Use of Cookies and Related Technologies**

- a) To identify you from other users on our platform, website(s) or web/IT portal(s) or mobile applications from your devices, we will use cookies, web beacons, server logs and other similar technologies which may automatically collect technical data about your equipment, browsing actions and patterns. These technologies are essential for enabling certain functions on our platforms, website(s) or web/IT portal(s) or mobile applications. If you prefer not to allow certain cookies, you may block or deactivate those cookies in your browser settings.
- b) We use log-in cookies to remember you when you log in to our platform, website(s) or web/IT portal(s) or mobile applications for a seamless experience. We also use session cookies to track your movement from page to page and to store your selected inputs, so you are not constantly asked for the same information.
- c) By continuing to use our platform, website(s) or web/IT portal(s) or mobile applications, you agree to the use of cookies on the sites as outlined above. However, please note that we have no control over the cookies used by third parties, and you should check the applicable privacy policy of the third-party website(s) to learn about how they handle your information.

## **2.2 Purposes for which the Personal Data is Collected**

**2.2.1** We will/may collect, use, disclose and/or process your personal data for the following purposes(s): -

- a) to verify your identity for the purpose of processing your membership application, job application and/or facilitating the registration, administration, and management of your membership account with us;
- b) to provide or supply any products, facilities and/or services you request, obtain or purchase from us, including the credit facilities, installment plan and/or subscription services;

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- c) to send you news, information, materials, notifications, updates about events, marketing messages, campaigns, sale promotion or events, offers, opportunities, products, benefits, programs, and/or services that we and/or our business partners provided or on our behalf;
  - d) to process and/or administer any marketing campaigns, contest, or events conducted by us or on our behalf if you have provided your marketing consent to participate in;
  - e) to conduct marketing activities including market research, customer profiling, customer insights, development activities and targeted marketing (including but not limited to data analytics, surveys, and/or focus groups) to improve our products, facilities and/or services for your benefit and to help us understand how to serve you better;
  - f) for promotional and publicity purposes, including recording or taking photographs of participants at events or functions organised, hosted or participated in by us;
  - g) to carry out your instructions, responding to inquiries or dealing with feedback given by you or on your behalf, including contacting you via phone/voice call, text message, email and/or postal mail;
  - h) to administer and manage your account with us, which include various modes of such as phone/voice call, text message, email and/or postal mail. This communication may involve mailing of correspondence, documents, or notices to you, or reaching out to alternate contact details provided by you if we are unable to contact you;
  - i) to facilitate and/or handling payments for products and/or services provided by us, our subsidiaries, and/or a third party on our behalf, including verification of credit card details with third parties and using the provided personal data to match against databases of known fraudulent transactions;
  - j) to carry out due diligence checks, credit checks/assessment or any other screening activities (including security and background checks) in

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accordance with legal or regulatory obligations or our risk management procedures;

- k) to prevent or investigate any fraud, unlawful activities, omission or misconduct, whether or not there is any suspicion of such activities;
- l) to comply with all applicable laws, regulations, rules, directives, orders, instructions, guidance and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities;
- m) to produce statistics and research for internal and/or statutory reporting, financial reporting, regulatory reporting, management reporting, risk management, audit and/or record-keeping requirements and performing our policy/process reviews; and/or
- n) for any other purposes that is incidental, ancillary or in furtherance to the above purposes and permitted under the local laws and regulations.

## **2.3 Disclosure and Transfer of Personal Data**

**2.3.1** In carry out one or more of the purposes set out under this PDPA Policy, we may disclose your personal data to any other third parties, whether located within or outside Singapore, such as: -

- a) our agents, business partners, representatives, service providers, contractors, sub-contractors or any other third-party organisations, individuals as may be determined or deemed necessary;
- b) any banks, payment services providers and/or other payment gateways;
- c) our auditors, consultants, underwriters, insurers, lawyers, financial or professional institutions, and professional advisors;
- d) our associated, affiliated, subsidiaries or related companies;
- e) any supervisory, governmental, law enforcement agencies and/or any relevant authorities; and/or

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f) any person to whom disclosure is permitted/required by any applicable laws, regulations, enforcement government requests, or court orders.

**2.3.2** To facilitate our interaction with you, and for the purposes of data storage, processing, or providing any services, facilities and/or products, we may need to transfer your personal data to a third-party service or product provider within or outside of Singapore in accordance with applicable laws. We will ensure the country to which your personal data is transferred has a similar or equivalent personal data protection laws in place. We will also ensure the relevant third-party executes an agreement to undertake their responsibility of protecting your personal data and acknowledge the consequences of failure to carry out this duty.

## **2.4 Consent & Withdrawal**

Unless the applicable laws or regulations allow otherwise, your personal data shall only be collected by us with your express written consent, and you represent that you are over 16 years of age and have the capacity to give valid consent. If your age is below 16, you must obtain consent from your parent or guardian before providing us your personal data. If the consent is not obtained, your parent or guardian should contact us using the contact details set out in this PDPA Policy to remove your personal data.

Please be informed that you are required to provide your personal information deemed necessary by us on the abovementioned purposes. Otherwise, we may not be able to process your application, or provide you with our products, facilities and/or services, and we may not be able to establish or maintain a relationship, contractual or otherwise with you. If you would like to withdraw your consent, you may do so by sending a request to our Data Protection Officer as stipulated under Clause 2.13 of this PDPA Policy below.

## **2.5 Accuracy**

By providing us with your Personal Data, you warrant and understood that it is your obligation to ensure that all the personal data you submitted to us is true, accurate, complete, and not misleading. You undertake to notify us as soon as

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practicable of any changes or alterations to the same. Any loss or damage caused by the provision of erroneous, inaccurate, or incomplete information will be your exclusive and absolute responsibility.

## **2.6 Retention**

We will retain your personal information in compliance with this PDPA Policy and/or the terms and conditions of your agreement(s) with Courts for the duration of your relationship with us and this retention period may extend for as long as necessary to protect the interests of Courts or and/or our customers, or as deemed necessary by the law or based on Courts' relevant policies. After this designated period, we will destroy your personal data from our database without further notice or without any liability shall be imposed upon us.

## **2.7 Security Protection**

Security or protection of your personal data is important to us. We diligently take appropriate action and practical steps to securely keep and process your personal data. This involves by maintaining physical, electronic, and procedural safeguards in compliance with applicable regulations to protect your personal data from any loss, misuse, modification, unauthorized or accidental access or disclosure, alteration, or destruction. We ensure that access to the personal data you have provided is restricted to our authorised employees who are trained in handling your information. These authorised personnel are bound by strict confidentiality requirements and are committed upholding your privacy at all times.

## **2.8 Personal Data Breach Handling**

In the event of any security breach or leakage involving your personal data, we are committed to notify you. We will conduct a throughout investigation to identify the root cause(s) of the breach and implement appropriate remedial actions to prevent recurrence in the future. For any personal data breach that could potentially post reputational risk to Courts or undermine public confidence and trust, we will immediately notify the Personal Data Protection Commission Singapore upon discovery of the breach. If the breach appears to involve fraud,

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criminal activity or poses any risk of identity theft, we will also notify the relevant law enforcement agency.

## **2.9 Access and Correction**

Ensuring your accuracy and currency of your personal data is priority to us. You have the right to access and/or correct any personal data that we hold about you, subject to the requirements of the PDPA. If you wish to request a copy of your personal data held by us, or to update and/or correct your personal data which you have previously provided to us, please email or write to our Data Protection Officer as stipulated under Clause 2.13 of this PDPA Policy below and such request may be subject to an administrative or prescribed fee as permitted by law.

## **2.10 Complaint Process/Channel**

Any complaint or grievance regarding how we handle your personal data or our compliance with the PDPA, you may reach to us by emailing or writing to our Data Protection Officer as outlined in Clause 2.13.

## **2.11 DO NOT CALL (DNC) Provisions**

We may call and/or send marketing messages to your Singapore Phone number if: -

- a) you have given us your consent; or
- b) you have not registered with the national DNC Registry; or
- c) the sending of such messaging or calling is permissible under the applicable law and regulation.

Our marketing messages aim to update you about our exclusive offers, rewards program and special deals from our preferred partners and advertisers. If you do not wish to continue receiving such messages or to opt out, you can indicate your preference at any time by sending an email to our Data Protection Officer. Your request will be processed within 10 working days.

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Please note that even after opting out of marketing messages, you may still continue to receive non-marketing messages, such as product updates and service notices as permitted under applicable laws and regulations.

## **2.12 Changes/Revisions to this Policy**

We reserve the right to amend this PDPA Policy from time to time without prior notice. If there are any changes to this PDPA Policy, we will replace it with an updated version and will make it available on our website at <https://www.courts.com.sg/>. You are encouraged to visit on this website to get the latest information on our latest version of this PDPA Policy.

## **2.13 How to Contact Us**

Should you wish to feedback, comments, questions, or request in relation toward your personal data with us or pertaining to this PDPA Policy, you may contact us at the following address, phone no. and/or email:

**DATA PROTECTION OFFICER  
COURTS (SINGAPORE) PTE LTD**

50, Tampines North Drive 2,  
Singapore 528766.

Tel: 1800 222 6868

Email: [dpo@courts.com.sg](mailto:dpo@courts.com.sg)

## **2.14 Governing Law**

This PDPA Policy and your use of this website shall be governed in all aspects by the laws of Singapore.

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