

Muddy Murphy Holdings

Data Protection Policy (“DPA”)

Introduction

Personal data refers to any data or information about you from which you can be identified either: -

(a) from that data; or

(b) from that data and other information to which we have or are likely to have access.

This includes personal details like your name, passport or other identification numbers, contact numbers, address, email, date of birth, occupation, education, income levels, photos and videos of you from our events, restaurants, pubs, sports clubs or office surveillances, and information about your use of our services, website (including cookies and IP address) and the MMH “Club Mudd” interactive membership mobile application (“**App**”).

Muddy Murphy Holdings and its subsidiaries (“**MMH**”) are committed to safeguarding your privacy and will only collect, use, store and disclose your personal data (“**Personal Data**”) in accordance with the Personal Data Protection Act (“**PDPA**”) to better create promotions suited to you.

We have enforced measures to protect your Personal data in compliance with the PDPA. This DPA lays out the details on how we collect, use, disclose and store your Personal Data.

Consent

By using the App, you are deemed to have agreed and consented to MMH as well as our respective agents, authorised service providers and relevant third parties collecting, using, storing, disclosing and/or sharing your personal data in the manner set forth in this DPA

Warranties

By using the App and our websites, you warrant and represent that all Personal Data you have submitted or will submit to us is complete, accurate, true and correct in all respects and you are responsible for keeping your personal data up to date.

You acknowledge that failure on your part to do so may result in our inability to provide you with the products and services you have requested. To update your personal data, please reach out to our Data Protection Officer at MMH.

Where you provide to us Personal Data concerning individuals other than yourself, you warrant and represent that you have obtained all legally required consents, whether explicit or deemed, from the concerned individuals and you shall retain proof of such consent(s), such proof to be provided to us upon our request.

We Keep Your Personal Data Confidential and Secure

Your privacy is of utmost importance to us. At each stage of data collection, use and disclosure, we implement physical, electronic, administrative and procedural safeguards to protect your personal data against loss, misuse, damage and unauthorized access, modifications or disclosures. We regularly review and enhance our security policies and measures to consistently maintain a high level of security.

Ways we collect

We may collect your Personal Data when you:

- Join our Mailing List
- Use our App
- Reaching out to us with a question or request through our Contact Us Page on our websites or emailing us directly
- Participate in a competition, lucky draw or survey
- Visit our websites (through the usage of cookies and other technologies)

What we collect

With different avenues of collection, the information collected varies:

- Identity – This includes name, address, telephone number, e-mail address, date of birth, as well as device ID and IP address.
- Interactions – An email or feedback you send to us.
- Preferences – Ways you would like to be contacted.

Purposes for Collection, Use and Disclosure of Your Personal Data

We collect, use and/or disclose your personal data for:

- Responding to enquiries.
- Store information to perform certain functions such as completing forms, facilitating website navigation, authentication, and enabling marketing and advertising technology.
- Conduct market research and customer satisfaction surveys to improve our customer service.
- Improve your user experience based on your usage behaviour.

- Offer rewards and promotions, and share promotional benefits and loyalty programs which you may qualify for.
- Provide updates, offers, invitations to events and deliver relevant advertising, including through voice, SMS and digital advertising such as social media platforms with your prior consent or if otherwise permitted under local laws and regulations.
- Inform you of service and security issues.
- Meet legal, regulatory and other requirements including providing assistance to law enforcement, judicial and other government agencies.

We will not use your personal data for purposes other than what we have informed you, or which are permitted under local laws and regulations. We will not offer, publish or share your personal data with third parties outside of MMH for commercial purposes, without seeking your explicit permission. We will retain your information for only as long as there is a business or legal need.

Sharing your information

Generally, we shall protect and keep confidential your personal data. We will disclose your personal data only with your consent and for purposes that you have been informed about.

We may share your information with:

- Related companies under MMH
- Business partners and vendors we work with to deliver services
- Industry regulators and other government organisations, as required by local laws and regulations

Your information is disclosed to the above only for relevant purposes (please refer to those mentioned in this Policy) or to protect the interests of our customers.

In some cases, we encrypt, anonymise and aggregate the information before sharing it.

Anonymising means stripping the information of personally identifiable features.

Aggregating means presenting the information in groups or segments e.g. age groups.

We will also ensure that overseas organisations we work with observe strict confidentiality and data protection obligations.

When we disclose your personal data to third parties, we will ensure that they are contractually bound to protect your personal data in accordance with applicable laws and regulations, save in cases where your personal data is shared with governmental agencies and regulators, or where your personal data is publicly available or where use/disclosure of your personal data is otherwise legally mandated and exempted.

If your personal data is transferred overseas, we will inform you of the extent to which your personal data will be protected in the foreign jurisdiction(s) to which it will be transferred and seek your consent.

Protecting your information

We have implemented stringent measures to secure and protect your information. These include:

- Safeguards to prevent security breaches
- Limited access to information
- Strict verification to prevent unauthorised access

How Long We Keep Your Personal Data For

We shall store your personal data for as long as necessary to fulfil the purposes for which such data was collected, our business purposes, our internal and legal needs or as is otherwise legally required.

In general, your personal data is kept for 5 years following transactions and your other personal data 5 years after the closing of the business relationship between you and MMH.

Respecting your contact preferences

Muddy Murphy Holdings and its subsidiaries is committed to complying with the Do Not Call (DNC) provisions. We have always been mindful of engaging our customers in a more targeted and relevant way.

We may send marketing messages to your Singapore telephone number if:

1. you have given us consent, OR
2. you have not registered with the national DNC Registry, OR
3. the sending of such messages is permissible under applicable laws and regulations.

Our marketing messages aim to update you about our exclusive offers, rewards programme and special deals from our preferred partners and advertisers.

You may configure your browser setting to disable all cookies and mobile advertising IDs, including cookies and mobile advertising IDs associated with our services.

However, it is important to remember that some of our services may not function properly if your cookies and/or mobile advertising IDs are disabled.

Queries, Access/Correction Requests and Withdrawal of Consent

If you have any queries, or you wish to access and/or correct your personal data, or you wish to withdraw your consent to our collection, use or disclosure of your personal data, please contact our Data Protection Officer by filling the form at:

<http://mmholdings.com.sg/contact-us.php>

Our Data Protection Officer shall strive to respond to you within 30 days of your submission.

Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place.

Such withdrawal may result in the termination of any agreement you may have with us.

General Information

We may amend or modify this Policy from time to time, such as in response to changes to legislation.