

This Privacy and Cookie Policy (the "Policy") becomes effective on 29 December 2022 for all users.

INTRODUCTION

Vouch SG Pte Ltd helps hotels, museums, properties, and other businesses (collectively, "Properties") deliver better service. We want Property guests and staff to stay in control of their data. We do not sell guest data or use it to contact people for marketing purposes. We commit to strong privacy protection principles, as outlined in this privacy policy ("Policy").

We handle your privacy in strict compliance with the EU General Data Protection Regulation (GDPR) 2016/679 and the Data Protection Act 2018 (DPA), and Personal Data Protection Act (PDPA).

This Policy covers the policies and practices for how Vouch SG Pte Ltd (hereinafter referred to as "Vouch," "we," or "us") handles the Personal Data of visitors to our website <http://www.vouchconcierge.com/> ("Website") and guests of Properties ("guests") (collectively, "you," or "your") who use our web platform, mobile platform, or applications or products that link to this Policy (together, the "Services"). "Personal Data" is information that relates to an identified or identifiable individual.

This information is controlled by the relevant Property, and we are processors of that data. Please consult the privacy policy of your Property for the complete details of how your data is to be used to service your needs as part of your interaction with that Property.

COLLECTION OF INFORMATION

Legal basis for processing of Information. We will process your Personal Data on either one of the following legal basis:

- **Your prior consent;** where you have clearly expressed your approval of Vouch's processing of your Personal Data;
- **A contractual relationship between you and Vouch;** in such case, the processing of your Personal Data is generally necessary to the execution or the performance of the contract. This means that if you do not wish Vouch to process your Personal Data in that context, Vouch may or will be obliged to refuse to enter into such contract with you or will not be able to provide the products or services covered in this contract;
- **Legal obligations applicable to Vouch's activities;** Vouch may be required to implement procedures for the collection and retention of Personal Data to fulfil legal requirements
- **The legitimate interest of Vouch in relation to applicable data protection law;** Necessary for Vouch's legitimate interest to run our business, provide services and

improvement of network security. Vouch shall consider your fundamental rights and interest in determining whether processing is legitimate and lawful.

Information You Provide Directly to Us. When you use the services or engage in certain activities, such as registering, requesting services, or contacting us directly, we may ask you to provide some or all of the following types of information:

- Contact information, such as full name, email address, telephone or mobile number, and address;
- Reservation information such confirmation number, room, arrival date, and departure date
- Demographic information, such as your gender, postal code, year of birth, and details about your personal preferences;
- Requests and other correspondence you send to us.

You can choose not to provide information to us directly, but some of this information is required to participate in some Services, such as registering or requesting services from Properties through the Vouch platform.

The best way to protect sensitive data is to not share it. Please do not enter private or sensitive information into the Vouch Services.

Information We Collect Automatically. We may collect certain information automatically through your use of our Services or other methods of web analysis, such as:

- Location information as provided by your device or browser, such as your device's GPS signal or information about nearby WiFi access points;
- Your Internet Protocol (IP) address, cookie identifiers, mobile advertising identifiers, and other device identifiers that are automatically assigned to your computer or device when you access the Internet;
- Information about your device such as browser type, operating system, and Internet service provider; and
- Information about your visit to our website such as pages that you visit before and after using the services, the date and time of your visit, the amount of time you spend on each page, information about the links you click and pages you view within the Services, and other actions taken through use of the Services.

Information We obtain from other sources. Properties send Vouch guest information regarding communications, requests, maintenance, and other service delivery. Vouch may also obtain information about you from other third-party services and organizations to enhance your experience.

Additionally, Properties may use additional technologies such as in-room entertainment to send service requests, which may contain Personal Data, to Vouch.

Vouch will ensure that contents of this privacy policy are shared with you under the following the conditions:

- within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
- if the personal data are to be used for communication with you, at the latest at the time of the first communication to that data subject; or
- if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.

Cookies, Pixel Tags, Interest-Based Advertising, and Similar Technologies. We, as well as Third Parties that provide content, advertising, or other functionality on our services, may use cookies, pixel tags, local storage, and other technologies to automatically collect information through the Services.

We use Technologies that are essentially small data files placed on your computer, tablet, mobile phone, or other devices (referred to collectively as a "device") that allow us to record certain pieces of information whenever you visit or interact with our sites, Services, applications, messaging, and tools, and to recognize you across devices.

Cookies. Cookies are small text files placed in visitors' computer browsers to store their preferences. Most browsers allow you to block and delete cookies. However, if you do that, the Services may not work properly.

Pixel Tags/Web Beacons. A pixel tag (also known as a web beacon) is a piece of code embedded on the Website or Services that collects information about users' engagement on that web page. The use of a pixel allows us to record, for example, that a user has visited a particular web page or clicked on a particular advertisement.

Social Media Widgets. Our Website includes social media features such as the Facebook "Like" button and LinkedIn (that might include widgets such as the share this button or other interactive mini-programs). These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. These social media features are either hosted by a Third Party or hosted directly on our Website. Your interactions with these features are governed by the privacy policy of the company providing it.

Analytics. We may also use Google Analytics and Google Analytics Demographics and Interest Reporting to collect information regarding visitor behavior and visitor demographics on some of our Services, and to develop website content. This analytics data is not tied to any Personal Data. For more information about Google Analytics, please visit www.google.com/policies/privacy/partners/. You can opt out of Google's collection and Processing of data generated by your use of the Services by going to <http://tools.google.com/dlpage/gaoptout>.

Our uses of such Technologies fall into the following general categories:

Operationally Necessary. We may use cookies, web beacons, or other similar technologies that are necessary to the operation of our sites, services, applications, and tools. This includes technologies that allow you access to our sites, services, applications, and tools; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as shopping-carts, saved search, or similar functions;

Performance Related. We may use cookies, web beacons, or other similar technologies to assess the performance of our websites, applications, services, and tools, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, applications, services, or tools;

Functionality Related. We may use cookies, web beacons, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites, services, applications, or tools. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

Advertising or Targeting Related. We may use first-party or third-party cookies and web beacons to deliver content, including ads relevant to your interests, on our sites or on third party sites. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

If you would like to opt-out of the Technologies we employ on our sites, services, applications, or tools, you may do so by blocking, deleting, or disabling them as your browser or device permits.

CATEGORIES AND USE OF INFORMATION

Personal Data.

The Personal Data we collect depends on the nature of your relationship with us:

- We may collect Personal Data from Website visitors to:
 - o Provide customized content and make recommendations that would improve your experience with the website
 - o To serve you ads on our own services or elsewhere online that match your inferred interests, preferences, and characteristics

- o Send you content and communications including advertisements and offers, about our own and our trusted partners' products and services
- We may collect Personal Data from guests of Properties using our Services to:
 - o For any activities that are necessary to support our contractual obligations to the Property
 - o Provide customized content and make recommendations that would improve your experience with the app or Property.
 - o Send you content and communications that you have requested or which are necessary for fulfilling our contractual obligations to you directly or via the Property
 - o We may also process payments for products and services
- We may collect Personal Data from staff members of a Property using our Services to:
 - o Provide you with materials about offers, products, and services offered by us, including new content or services
 - o Send you content and communications that you have requested or which are necessary for fulfilling our contractual obligations to you directly or via the Property
 - o For any other activities that are necessary to support our contractual obligations to you directly or via the Property
- We may collect Personal Data from all users of our Websites and Services to:
 - o Analyze the use of the services and guest data to understand and improve the services and user experience and develop new services
 - o Send you content and communications that you have requested or which are necessary for fulfilling our contractual obligations to you directly or via the Property
 - o Conduct surveys, research, and evaluations
 - o Prevent potentially prohibited or illegal activities
 - o For other purposes, we will disclose to you at the time we collect your information or pursuant to your consent

In addition, we use the Personal Data that we collect based on the following legal grounds and as necessary and appropriate for the following purposes:

To meet our legal obligations, for example:

- For audit and reporting purposes, including internal and external investigations
- To perform accounting and administrative tasks
- To respond to requests for information by competent public bodies and judicial authorities
- To enforce or manage legal claims.

In exceptional situations that are listed in the 3rd and 4th Schedules of the PDPA, for example:

- The use of the data is necessary to respond to an emergency that threatens the life, health or safety of any individual (e.g. disclosing to a doctor the personal data of a volunteer who has a heart attack);
- The personal data is publicly available; or
- The use is necessary for evaluative purposes

Anonymous and Aggregated Information. We may use your Personal Data and other information about you to create anonymized and aggregated information, such as de-identified demographic information, de-identified location information, information about the computer or device from which you access the services, or other analyses.

Anonymized and aggregated information is used for a variety of functions, including the measurement of visitors' interest in and use of various portions or features of the services. Anonymized or aggregated information is not Personal Data, and we may use such information in a number of ways, including research, internal analysis, analytics and any other legally permissible purposes.

DISCLOSURE OF INFORMATION

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

Properties. We share Personal Data with Properties you visit, as a byproduct of their using the Vouch platform to communicate with you. We do not control the privacy practices of these Properties, and their information practices are not covered by this Policy. We recommend that you visit the privacy policies of each Property that you visit.

Authorized Third-Party Vendors and Service Providers. We share Personal Data with third-party vendors and service providers that provide business services to us or on our behalf, such as IT services, payment processing services, to market products or services or deliver ads to you, analyze activity on the services, provide content, and help to maintain our user database and administer emails, surveys, or other communications. Payment information will be used and shared only to effectuate your order and may be stored by a service provider for purposes of future orders.

We prohibit our service providers from using or sharing your Personal Data except as necessary to perform the contracted services on our behalf or to comply with applicable legal requirements.

Corporate Affiliates. We may share Personal Data with and among corporate affiliates and subsidiaries for their internal business purposes or to provide you with a product or service that you have requested.

Business Transfers. We may share Personal Data in connection with an actual or proposed change in control, such as the sale of a website, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.

Legal Purposes. We may disclose Personal Data to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to prevent fraud and to protect and defend the rights, interests, safety, and security of Vouch, our users, or the public.

With Your Consent. We may share Personal Data for any other purposes disclosed to you at the time we collect the information or pursuant to your consent.

If you access third-party services, such as Facebook, Google, or Twitter, through the services to login to the services or to share information about your experience on the services with others, these third-party services may be able to collect information about you, including information about your activity on our websites or through the services, and they may notify your connections on the third-party services about your use of the services, in accordance with their own privacy policies.

Anonymous and Aggregated Information. We may share anonymous or aggregated information within Vouch and with third parties for our or their purposes in an anonymized or aggregated form that is designed to prevent anyone from identifying you.

RETENTION OF INFORMATION

Vouch retains the Personal Data we receive as described in this Policy for as long as you use our Services or as necessary to fulfill the purpose(s) for which it was collected, provide the Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws.

YOUR CHOICES AND RIGHTS

You may inquire as to whether Vouch is Processing Personal Data about you, request access to Personal Data, and ask that we correct, amend or delete your Personal Data where it is inaccurate. Where otherwise permitted by applicable law, you may contact us as described below to request access to, receive (port), seek rectification, or request erasure of Personal Data held about you by Vouch.

Vouch informs you that you are entitled to the following rights:

Rights of Access. to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Rectification. request correction of your personal data. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Erasure. request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object, to process your personal data. where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms.

Restriction. of processing your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the personal data's accuracy;
- where our use of the personal data is unlawful but you do not want us to erase it;
- where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.

Request transfer of your personal data. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent and Opting Out, you have the right to opt out of certain uses and disclosures of your Personal Data. Please note, if Vouch collected personal data about you from our Properties or on behalf of our Properties, please direct your query to the Property directly. Vouch will support our Properties as requested within a reasonable timeframe.

If you do not wish to receive marketing communications from us, you may opt out by clicking the "unsubscribe" link within the communication.

To opt out of other Personal Data processing or to raise any objections due to any dissatisfaction with our actions to your rights, contact us at privacy@vouchconcierge.com

Lodge a complaint with a supervisory authority while we suggest that you contact us beforehand, if you wish to exercise this right, you should contact directly the competent data protection authority.

Please include your full name, email address associated with your Account, and a detailed description of your data request. Such requests will be processed in line with local laws.

Cookies. You may be able to refuse or disable cookies by adjusting your web browser settings. Because each web browser is different, please consult the instructions provided by your web browser (typically in the “help” section). Please note that you may need to take additional steps to refuse or disable local storage and other technologies. If you choose to refuse, disable, or delete these technologies, some of the functionality of the Services may no longer be available to you.

Interest-Based Advertising. As noted above, you may stop or restrict the placement of cookies on your computer or remove them from your browser by adjusting your web browser preferences. Please note that cookie-based opt-outs are not effective on mobile applications. However, on many mobile devices, application users may opt out of certain mobile ads via their device settings.

To be clear, whether you are using our opt-out or an online industry opt-out, these cookie-based opt-outs must be performed on each device and browser that you wish to have opted-out. For example, if you have opted-out on your computer browser, that opt-out will not be effective on your mobile device. You must separately opt-out on each device.

Although Vouch makes good faith efforts to provide Individuals with access to their Personal Data, there may be circumstances in which Vouch is unable to provide access, including but not limited to: where the information contains legal privilege, would compromise others’ privacy or other legitimate rights, where the burden or expense of providing access would be disproportionate to the risks to the Individual’s privacy in the case in question or where it is commercially proprietary. If Vouch determines that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries. To protect your privacy, Vouch will take commercially reasonable steps to verify your identity before granting access to or making any changes to your Personal Data.

CHILDREN’S PRIVACY

Vouch's Services are not directed to children under 16 and we do not knowingly collect Personal Data from children under the age of 16 without parental consent, unless permitted by law. If you are under the age of 16, you must have your parent's permission to access the Services. If you learn that your child has provided us with Personal Data without your consent, you may contact us as described below. If we learn that a child under the age of 16 has provided us with Personal Data, we will delete it in accordance with applicable law.

THIRD-PARTY LINKS AND CONTENT

Some of the services may contain links to content maintained by third parties. We do not control the privacy practices of these third parties and they are not covered by this Policy. We recommend that you visit the privacy policies of any third-party content that you visit. We are not responsible for the privacy practices of these third parties, and the information practices of these third parties are not covered by this Privacy Policy.

DO-NOT-TRACK SIGNALS AND SIMILAR MECHANISMS

Some web browsers transmit "do-not-track" signals to websites. Because of differences in how web browsers incorporate and activate this feature, we currently do not take action in response to these signals.

PCI RESPONSIBILITY

Vouch does not store Credit Card data nor process payments. Vouch utilizes a third-party payment gateways that are responsible for securely storing your credit card data in alignment with information security requirements specified within the PCI DSS.

How do I submit a request to delete my data? You may request to review, access, change, correct, update, withdraw your consent to, or provide feedback on our use of, personal data by contacting our data protection officer at privacy@vouchconcierge.com (Attn: Data Protection Officer).

Opt-out of selling or disclosing your personal information Vouch does not sell or disclose your personal information for monetary gain or any valuable consideration. Vouch provides operations software to hotels and the hotels enter and use your personal information to provide services to you and other guests.

What are the categories of personal information collected? When a hotel uses the Vouch operations software or you engage in certain activities, such as requesting services

from the hotel, or contacting the hotel directly, the hotel may ask you to provide some or all of the following types of information:

- Contact information, such as full name, email address, telephone or mobile number, and address;
- Reservation information such confirmation number, room, arrival date, and departure date
- Demographic information, such as your gender, postal code, year of birth, and details about your personal preferences;
- Payment information, such as credit card number, expiration date, and credit card security code, where needed to complete a transaction; and
- Requests and other correspondence you send to the hotel.

What is the purpose of collecting my personal information? Vouch does not use the personal information collected by the hotels about you for its own purposes.

INTERNATIONAL USERS AND SAFEGUARDS FOR INTERNATIONAL TRANSFER OF PERSONAL DATA

If you are accessing the Services from outside Singapore, please be aware that your information may be transferred to, stored, and processed in Singapore.

The data protection and other laws of the Singapore and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to help ensure that your privacy is protected.

In cases where Vouch needs to transfer Personal Data outside the European Union, it shall ensure that adequate safeguards, as required under applicable data protection legislation, will be implemented (including, notably, the European Commission's Standard Contractual Clauses, as applicable). We utilize Standard Contractual Clauses to ensure that all Personal Data collected in the EU is adequately handled and protected. By using the services and providing us with information, you understand and agree that your information may be transferred to and stored on servers located outside your resident jurisdiction and in Singapore by us and the third parties with whom we share it.

Some non-European Economic Area (EEA) countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards (the full list of these countries is available [here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have ensured that adequate measures are in place, including by ensuring that the recipient is bound by EU Standard Contractual Clauses, EU-US Privacy Shield Certification, or an EU-approved code of conduct or certification, to protect your Personal Information. You may obtain a copy of these measures by contacting our data protection officer in accordance with the "Contact Us" section below.

SECURITY

We use reasonable measures to help protect information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

Vouch has administrative, physical and technical security measures in place to protect against the loss, misuse, and alteration of the information under our control. We utilize commercially reasonable practices to protect your data.

CHANGES TO THIS POLICY

We may update this Policy from time to time. If we update this Policy, We will revise the "Effective Date" date above and post the new Policy. If there are any material changes to this Policy, we will notify as required by applicable law. We recommend that you review this Policy each time you visit the services to stay informed of our privacy practices. Your continued relationship with Vouch after the posting or notice of any amended Privacy Policy shall constitute your agreement to be bound by any such changes. Any changes to this Policy take effect immediately after being posted or otherwise provided by Vouch.

CONTACT US

Contact our Data Protection Officer with privacy-related questions, complaints, or requests at privacy@vouchconcierge.com