

## PRIVACY POLICY

Lotte Travel Retail Singapore Pte. Ltd. (“we” or “us”) is committed to protecting and respecting your privacy.

This policy (together with our main Terms of Use and any other documents referred to on it) sets out the basis on which any personal data (as defined in the Personal Data Protection Act 2012 (“PDPA”)) (“Data”) we collect from you, or that you upload on [www.LotteLuxuryWhiskyAuction.sg](http://www.LotteLuxuryWhiskyAuction.sg) (the “Platform”), will be processed by us. Please read the following carefully to understand our views and practices regarding your Data and how we will treat it.

### INFORMATION WE MAY COLLECT

1. Depending on the nature of your interactions with us, we may collect and process the following information from you:
  - (a) information that you provide by filling in forms on the Platform including information provided at the time of registering to use the Platform, posting material, purchasing products, reporting a problem with the Platform, or requesting further services;
  - (b) information you share with us from third-party social networking providers;
  - (c) videos, documents or images that you upload onto the Platform;
  - (d) details of transactions you carry out through the Platform;
  - (e) financial information and data necessary to process payment should you make any purchases through the Platform;
  - (f) details of your visits to the Platform and the resources that you access via the Platform;
  - (g) if you contact us, a record of that correspondence; and
  - (h) responses to surveys that we send to you, although you do not have to respond to them.
2. We may also collect and process information from you from other sources, such as information about you from third-party services such as advertising partners and analytics providers.
3. We may also collect and process information automatically when you access the Platform, including internet or other network activity information such as your IP address and geolocation-related data, your operating system and browser type and cookies for system administration and to report aggregate information to our advertisers.
4. The Platform uses cookies to distinguish you from other users of the Platform. We may also use cookies set by third parties, which enable third party features or functionality to be provided on or through the Platform. Such cookies automatically collect information when you access the Platform, measure and analyse your use of the Platform. Some cookies are required for the Platform to operate, and other cookies enable us to track and target the interests of our users. This helps us to provide you with a good experience when you browse the Platform and allows us to improve your user experience on the Platform.

### WHERE WE STORE YOUR DATA

5. The Data that we collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or for one of our third party suppliers, including the platform developer. Such staff maybe engaged in, among other things, the maintenance and operation of the Platform, the supply of products or services requested by you, the processing of your payment details and the provision of

support services. In particular, the Data may be transferred to, stored by or processed by Beam Suntory Asia Pte. Ltd. (“**Beam Suntory**”), whom we are collaborating with for the silent auction on the Platform.

6. By submitting the Data, you agree to such transfer, storing or processing as set out in paragraph 5 above. We will take all steps reasonably necessary to ensure that your Data is treated securely and in accordance with this privacy policy.

#### **USES MADE OF THE INFORMATION**

7. We may collect, use and process your Data for any or all of the following purposes (collectively, referred to as the “**Purposes**”):
  - (a) to conduct the silent auction process on the Platform (including to process bids and identify and notify successfully bidders);
  - (b) to facilitate your use of the services offered on the Platform or access to the Platform;
  - (c) to ensure that content from the Platform is presented in the most effective manner for you and for your computer;
  - (d) to provide you with information, products or services that you request from us, and to otherwise carry out our obligations arising from any contracts entered into between you and us;
  - (e) to verify and carry out payment or credit transactions in relation to payments related to you. In order to verify and carry out such payment transactions, payment information which may include Data, will be transferred to third party payment service providers;
  - (f) to ascertain your identify in connection with fraud detection purposes;
  - (g) to provide you with information, products or services which we feel may interest you, where you have consented to be contacted for such purposes;
  - (h) to allow you to participate in interactive features of our service, when you choose to do so;
  - (i) to notify you about changes to our products and services;
  - (j) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - (k) any other purposes for which you have provided the information; and
  - (l) carrying out whatever else is reasonable or related to or in connection with the above and our provision of products and/or services to you.

#### **DISCLOSURE OF YOUR INFORMATION**

8. We may disclose your Data to any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Act (Cap. 50) to facilitate our business operation and administration from time to time for one or more of the above Purposes.
9. We may disclose your Data to third parties:
  - (a) for the purposes of providing products or services that you request from us, fulfilling our obligations arising from any contracts entered into between you and us, processing the

winning bid(s) and payments in connection therewith or otherwise in connection with your access to the Platform;

- (b) who are service providers (including the platform developer), suppliers, agents and other organisations we have contracted with to perform or who are otherwise involved in the performance of any of the Purposes (including Beam Suntory);
- (c) in the event that we sell or buy any business or assets, in which case we may disclose your Data to the prospective seller or buyer of such business or assets;
- (d) if we or substantially all of our shares or assets are acquired by a third party, in which case personal data held by us about our customers will be one of the transferred assets; and
- (e) if we are under a duty to disclose or share your Data, in order to comply with any legal obligation (including any direction from a governmental or regulatory body or law enforcement) or in order to enforce or apply our Terms.

10. We will not be liable for any unauthorised disclosure or use of your information by third parties.

### **CONSENT TO COLLECTION, USE, DISCLOSURE OF PERSONAL DATA**

- 11. By providing your Data to us, you consent to the collection, use, disclosure and/or transfer of your Data for the Purposes. Without prejudice to the foregoing, you further acknowledge and agree that Beam Suntory may access, use, disclose and transfer the collected Data in compliance with the terms of this privacy policy for the Purposes.
- 12. Please ensure that you speak to others before providing their Data to us. Kindly inform them that our collection, use and disclosure of their Data is solely for the Purposes. You are responsible for ensuring that any others whose Data you provide us with consents to our collection, use and disclosure of Data for the Purposes. You must provide us satisfactory and sufficient proof of such consents promptly upon our request.
- 13. You may withdraw your consent and request us to stop using and/or disclosing your Data for any or all of the Purposes by submitting your request to us in writing to Data Protection Officer at [nalangili@lotte.net](mailto:nalangili@lotte.net). Should you withdraw your consent to the collection, use or disclosure of your Data for any of the Purposes, it may impact our ability to proceed with your transactions, agreements or interactions with us. Upon receipt of your request, we will inform you of the consequences of the withdrawal of your consent. Please note that your withdrawal of consent will not prevent us from exercising our legal rights (including any remedies), or undertaking any steps as we may be entitled to at law.

### **YOUR RIGHTS**

- 14. The Platform may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Data to these websites.

### **ACCURACY**

- 15. We endeavour to ensure that all decisions involving your Data are based upon accurate and timely information. While we will do our best to base our decisions on accurate information, we rely on you to disclose all relevant information and to inform us of any significant changes. As such, you are kindly requested to disclose all relevant information, inform us of any changes and to ensure that all your Data that is submitted to us is current, complete, accurate, true and correct.

## **ACCESS AND CORRECTION**

16. The PDPA gives you the right to access information held about you. Your right of access can be exercised in accordance with the PDPA. Any access request may be subject to an administrative fee at our rates then in force to meet our costs in providing you with details of the information we hold about you.
17. We will respond to requests regarding access as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with details of your personal data that is held by us, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
18. In the event that you wish to correct and/or update your Data in our records, you may do so anytime by accessing your account on the Platform.
19. We take steps to share the updates to your Data with third parties and our affiliates with whom we have shared your Data if your Data is still necessary for the above Purposes.

## **RETENTION OF PERSONAL DATA**

20. We may retain your Data for so long as is necessary for the purpose for which it was collected, or for so long as required or permitted by applicable laws. We will cease to retain your Data or remove the means by which the Data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Data was collected and is no longer necessary for legal and business purposes.

## **CHANGES TO OUR PRIVACY POLICY**

21. Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail.

## **CONTACT**

22. Our data protection officer (“**DPO**”) is responsible for ensuring that our personal data protection policies are properly implemented and comply with that of the PDPA.
23. Questions, comments and requests regarding this privacy policy are welcome and should be addressed to our DPO at [nalangili@lotte.net](mailto:nalangili@lotte.net) .