

DATA PROTECTION POLICY

The purpose of this document ("**Data Protection Policy**" or "**DPP**") is to inform you of how **CAMERA RENTAL CENTRE (VIDEO) PTE. LTD** and **CRC GROUP PTE. LTD.** ("**CRC**" or "**We / Us / Our**") collects, uses, discloses, processes or handles your personal data, and to let you know how you can exercise your rights in respect of your personal data.

We strongly believe in protecting your Personal Data. We will take all reasonable security measures to prevent any unauthorized access, collection, use, disclosure, copying modification or disposal of your Personal Data. We will also require all service providers and third parties to whom we will provide your Personal Data to agree and comply with our DPP. While we will use all reasonable efforts to ensure that they comply with our DPP, we will not be liable to you if any person fails to do so.

By interacting with us, submitting information to us, or signing up for any Products and Services offered by us, you are deemed to have given your consent to CRC collecting, using, disclosing, sharing and disclosing your Personal Data to the CRC's authorised service providers and relevant third parties in the manner set forth in this DPP.

We may update this Data Protection Policy from time to time to ensure that this Data Protection Policy is consistent with any future developments and/or to accommodate any changes in legal or regulatory requirements.

This policy applies to you if **you** (or "**Your / Yours**") have engaged / are going to engage our **Products and Services**.

DEFINITIONS

In this Policy, the following terms shall have the following meanings (unless stated otherwise elsewhere in this DPP):

"Act"	refers to the Personal Data Protection Act 2012, in force as of the date of this policy
"proxy"	refers to the organisation and/or individual whom you have authorised to provide your Personal Data to CRC

"CRC" or "We / Us / Our"	refers to the Camera Rental Centre group of companies (CRC Group Pte Ltd, Camera Rental Centre (Video) Pte Ltd and its subsidiaries)
"DPO"	refers to the Data Protection Officer who is appointed by CRC pursuant to the Act
"DPP"	refers to this Data Protection Policy
"Laws"	means the Act, other Statutes, regulations made thereunder, the Credit Bureau Act 2016, and any other applicable laws, regulations, guidelines, directives, codes of practice or, where the context so requires the order or other lawful request made by any Public Agency
"Outlet"	refers to our retail outlets, roadshows and other contact points
"Products and Services"	refers to the rental and/or sale of photography/videography equipment, studio rental and any other service(s) rendered by Camera Rental Video and CRC Group Pte Ltd or third parties (through CRC) to you
"Public Agency"	refers to any Government body, including any ministry, department, agency (including law enforcement agencies), or organ of State, any judicial or quasi-judicial body or disciplinary, arbitral or mediatory body appointed under any written law in Singapore or any statutory body established under a public Act for a public function that is so appointed by the Minister by notification in the Gazette for the purposes of the Act.

1. **PERSONAL DATA**

In this **DPP**, personal data refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have, including data in our records as may be updated from time to time ("**Personal Data**").

2. **COLLECTION OF PERSONAL DATA**

2.1 Personal Data may be collected from you in the following ways:

- When you enquire about our Products and Services via email, website, SMS, telephone conversations, direct messaging apps, Camera Rental Centre app and face-to-face encounters over our service counters;
- When you are contacted by, and respond to, our customer service officers and marketing representatives;
- When you use some of our Products and Services, for example, websites and app(s) which we own or manage, through the use of technology such as cookies;
- When you request that we contact you, be included in an email or other mailing list(s);
- When you respond to our promotions, initiatives or to any requests for additional Personal Data;
- During CCTV recordings when you visit our Outlets;
- When you participate in a competition, lucky draw or survey administered by us;
- When we receive references from business partners and third parties (i.e where you have been referred by them);
- When we obtain it from other sources, such as employers, credit reference agencies, fraud-prevention agencies, business directories, law enforcement agencies, business associations and/or other Public Agency;
- When we seek information from third parties about you in connection with the Products and Services you have applied for;
- When you submit your Personal Data to us for any other reasons; and/or
- When we collect it by other lawful means.

2.2 We may request for the following Personal Data when you enquire about our Products and Services at any point of time:

2.2.1 For first-time customers

- NRIC / Work Permit / Passport
- Latest proof of address (i.e. utility, phone bill, bank statement)
- Valid contact number
- Email address

2.2.2 For visiting tourists in Singapore

- Passport facing page
- Valid contact number
- Confirmation slip of your accommodation in Singapore
- Local guarantor contact information (*where applicable*)

2.3 Failure on your part to do so may result in our inability to provide you with the Products and Services that you and/or your proxy have requested for.

2.4 We generally do not collect your personal data unless it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you (**proxy**) to disclose your personal data to us after (i) you (or your proxy) have been notified of the purposes for which the data is collected, or (ii) you (or your proxy) have provided written consent to the collection and usage of your personal data for the purposes stated in this section.

2.5 If you have provided us with any Personal Data relating to another individual (i.e information of your spouse, children, parents, employees and/or guarantors), by submitting such information to us, you represent to us that you have obtained the consent of the other individual to provide us with their Personal Data for the respective purposes set out in this DPP.

3. **PURPOSES FOR USAGE AND DISCLOSURE OF PERSONAL DATA**

3.1 We may use your personal data for any or all of the following purposes:

- Verifying your identity;
- Performing obligations in the course of or in connection with our provision of Products and Services as requested by you;
- Responding to, handling, and processing queries, requests, applications, complaints, and feedback from you and/or your proxy;
- Processing payment or credit transactions;
- Offering and administering customer loyalty benefits, reward benefits, promotional benefits, contests and lucky draws;
- Facilitating third party Products and Services if purchased, obtained, administered or processed through us;
- Keeping you informed of any new Products and Services, industry developments or promotional offers we have that might be of interest to you via electronic direct mailers;
- Performing internal customers analytics for market research/marketing purposes;
- Conducting investigations and internal risk management checks / credit checks / fraud detection on the grounds of suspected illegal activities (including but not limited to performing credit checks and disclosures to law enforcement agencies);
- 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;

3.2 The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (i.e. pursuant to your rental agreement and/or equipment collection from us) has been terminated or

altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

3.3 We may disclose your Personal Data for the Purposes indicated in Section 3.1 to our employees, third parties and service providers, which includes without limitation to the following personnel:

- Technical service trainers (i.e. Drone, Photographers, Videographers) for the purpose of conducting training workshops for you;
- Courier service companies / delivery agents;
- Auditors and legal advisors (including but not limited to obtaining legal advice and dispute resolution);
- Credit reference bureaus (i.e, Experian Non-Bank Bureau) for the preparation of credit reports and for the evaluation of creditworthiness. Results of these may be recorded for future reference;
- Debt collection / recovery agencies for enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by our service partners);
- Law enforcement and Public Agency to assist in any lawful investigations;
- Any other Business Partners whom we have collaborated with to provide and enhance your customer experience with us;
- Any other party to whom you authorise us to disclose Personal Data to

3.4 We will not disclose your Personal Data to other persons or entities for the advertising, promotion or marketing of such party's Products and Services, and the Group will not sell your Personal Data to anyone for any marketing purpose; without your consent.

3.5 You understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our websites, apps and any other online service(s); any transmission is at your own risk. Additionally, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.

4. **WITHDRAWING YOUR CONSENT**

4.1 You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request via email to dpo@camerarental.biz. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing.

4.2 Upon receipt of your written request to withdraw your consent, we shall seek to process your request within ten (10) business days of receiving it.

4.3 Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our Products and Services to you and we shall, in such circumstances, notify you before completing the processing of your request. All Products and Services that were rendered to you during the contractual period will have to be returned to us at your own cost within 24 hours of notification.

There will be no refunds of services, as stated in the signed rental invoice. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in Clause 4.1 above.

4.4 If you have indicated your consent to receiving marketing communications from CRC, you may separately withdraw such consent via the unsubscribe options as stated on the email marketing message or send in your request to dpo@camerarental.biz. We will get back to you within ten (10) business days.

4.5 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection,

use and disclose without consent is permitted or required under applicable laws.

5. ACCESS TO AND CORRECTION OF PERSONAL DATA

5.1 If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a request to correct or update any of your personal data which we hold about you, you may submit your request via email to dpo@camerarental.biz.

5.2 Please note that if your Personal Data has been provided to us by a third party (your proxy), you should contact that organisation or individual to make such queries, complaints, access and correction requests to us on your behalf.

5.3 Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

5.4 We will respond to your request as soon as reasonably possible. In general, our response will be within ten (10) business days. If we are not 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 any personal data or to make a correction requested by you, 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).

6. ACCURACY OF PERSONAL DATA

6.1 We generally rely on personal data provided by you (or your proxy). You and/or your proxy should ensure that all Personal Data submitted to us is complete, accurate and true.

6.2 In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data via email: dpo@camerarental.biz

7. **RETENTION OF PERSONAL DATA**

7.1 We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

7.2 We will cease to retain your personal 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 personal data was collected, and is no longer necessary for legal or business purposes.

8. **TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE**

We generally do not transfer your personal data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

9. **DATA PROTECTION OFFICER**

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Data Protection Officer

Camera Rental Centre
50 South Bridge
#02-18 CMO Building
Singapore 058682

or through email dpo@camerarental.biz

10. **EFFECT OF NOTICE AND CHANGES TO NOTICE**

1. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
2. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our Products and Services constitutes your acknowledgement and acceptance of such changes.

Effective date : 16/08/2019

Last updated : 16/08/2019