

PRIVACY POLICY

PLEASE READ THIS PRIVACY POLICY CAREFULLY,

by clicking or checking “SIGN UP”, “I AGREE”, “I AGREE AND CONSENT TO THE COLLECTION, USE, DISCLOSURE, STORAGE, TRANSFER AND/OR PROCESSING OF MY PERSONAL DATA FOR THE PURPOSE STATED IN, AND UNDER THE TERMS OF THE PRIVACY POLICY”, or similar statements available at the “www.mspaco.com.sg” registration page, or in the course of providing you with the Services or access to the Site, you acknowledge that you have read and understood the terms of this Privacy Policy, and that you have agreed and consented to the collection, use, disclosure, storage, transfer and/or processing of your personal data as described in the Privacy Policy.

INTRODUCTION

This Privacy Policy describes how we would collect, use, maintain and disclose information collected from users and/or members (each a “User”) of www. Mspaco.com.sg website (“Site”). This Privacy Policy applies to the Site and all products and services offered by us.

TERMS

We may collect personal data and information from Users when Users access our Site, register on the Site, key in information as a result of accessing or using our Site, and/or in connection with activities, services, features or resources which are available on our Site.

Users may refuse to supply personal data or information, except that Users may not participate in certain activities on the Site.

We will only collect personal data from Users if you voluntarily submit such personal information.

If you wish to delete any of the data, you may reach out to us via email to [].
You may wish to view our PDPA policy here.

Whenever User has to provide personal data, we must ask User to click “I AGREE”

When and where on the Site would this be? What are the words which we use on the Site? I have suggested some words, please let me know if applicable?

How about APP?

OTHER INFORMATION

In the course of interacting on and within our Site, you may provide other information (other than personal data), which we may collect such as [the browser name, the type of computer and technical information about Users means of connection to our Site, such as the operating system and the Internet service providers utilized and other similar information.]

COOKIES

We, or our authorised service providers, use cookies to enhance the User's experience on the Site. Your web browser will place cookies in User's hard drive for record-keeping purposes and to track information about the Users. Users may choose to set their web browsers to refuse cookies.

However this would affect User's experience on our Site. (1) What other data would we collect?

USE OF PERSONAL DATA

We may collect, use, disclose, store, transfer and/or process Users' personal data for the following purposes:

- (a) to fulfil your purchaser order such as processing your payment, procurement and delivery of the products and services, and warranty and facilitating returns, refunds, provide customer support, to administer your membership account with us, to display your name, username, profile on the Platform/Site (including reviews) ;
- (b) to conduct Promotions, marketing activities, surveys in relation to the products and services offered on and through our Site.
- (c) to improve our Site and delivery of our service. We may use feedback from you to better our services.
- (d) to send news via mailing list, push notifications on product or service updates or information. You may choose to at any time to unsubscribe. [Unsubscribe instructions are at the end of every email.]
- (e) to process your feedback and complaints, to investigate any actual or suspected breaches of our Terms of Use, Privacy Policy, fraud, unlawful activity, misconduct,
- (f) to comply with any legal or regulatory requirements directives or conditions, and
- (g) any other purpose which you have consented to.

By providing your personal and other data, Users agree that we may use your personal data for the purposes as specified herein. Should you not agree to the above uses, please do not provide your personal data.

We must specify what we will use the Personal Data for and how we will use the Personal Data. The uses are to be stated here, and also at the point when personal data is given by the User. (this is ensure that the consent has been expressly given.)

Please let me know if there are further uses? They must be specified here.

Please ensure that there is an unsubscribe feature. And please let me know if every email has the unsubscribe instructions?

Please see NOTE 1 below. For list from Lazada.

SELLER Personal data? Will we be asking the Seller to upload any personal data?

PROTECTION OF YOUR PERSONAL DATA

Save as described below, we will not share your personal data with any third party. We have appropriate data collection, storage, and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal data, username, password, transaction information and data stored on our Site.

Your personal data may be shared with third parties who provide a service to our Site. For example, in processing your payment, fulfilment of your purchase order on our Site, such as the procurement and delivery of your products and/or services. Further we may use third party service providers to help us operate our business and the Site or administer activities on our behalf, such as collating your feedback, sending out news, surveys, conducting marketing activities, provided you have provided your consent.

We do not sell, trade, or rent Users' personal data to others.

We may share generic aggregated demographic information not linked to any personal identification information regarding visitors and Users using our Site with our business partners, trusted affiliates and advertisers for the purposes stated above.

- (1) Please confirm we will not be sharing personal data of our users with others.

- (2) Please confirm our system can do the portion in green highlights. Ideally we should be providing more details. Do you have the details? (please see description from Lazada. See NOTE 2 below. Will we be doing the same?)

- (3) Please confirm that we will not sell, trade or rent personal data.

- (4) Do we intend to anonymise and aggregate data for other uses? If not, please delete portion in cyan

UPDATING PERSONAL DATA

You can update your personal data at any time by accessing your account on the Site.

(Add more for next version)

CHANGES

We reserve the right to modify this Privacy Policy at any time at our discretion. When we do, we will post a notification within our Site. Such modification shall be effective immediately upon posting, unless otherwise specified. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

CONTINUED USE AND ACCEPTANCE OF TERMS

By using the Site, you agree to accept the terms of this Privacy Policy. Your continued use of the Site after the posting and/or notification of any modification to this Privacy Policy signifies your acceptance of those modifications.

It is important to keep track of the changes to the Privacy Policy, and the date should be inserted at the end of the Privacy Policy.

THIRD PARTY SITES

Our Site may contain links to other websites operated by other parties, such as our business affiliates, or payment gateways. Please be advised to check on the applicable privacy policies of those websites to ascertain how they will handle your personal data. We are not responsible for the privacy policies implemented by those websites.

AUTHORITY TO TRANSACT

You confirm and warrant that (1) you are not a minor and are above the age of 18 years old in Singapore and (2) you are capable of understanding and accepting the terms of this Privacy Policy.

We do not sell products to minors, nor provide any Service or the use of the Site to minors. We do not knowingly collect any personal data relating to minors.

GOVERNING LAW

The formation, interpretation, and performance of this Privacy Policy and any disputes arising out of it shall be governed by laws of Singapore without regard to its rules on conflicts or choice of law and, to the extent applicable, the laws of Singapore. The exclusive jurisdiction and venue for actions related to the subject matter hereof shall be the courts located in Singapore, and you hereby submit to the personal jurisdiction of such courts.

CONTACT US

If you have any questions, concerns, or complaints regarding this Privacy Policy, we encourage you to contact us using the details below:

<http://mspaco.com.sg>

info@mspaco.com.sg

or visit us at [Poiz Centre]

This document was last updated on November 2, 2021.

[Version 1.0]

NOTE 1:

Purpose of Use

3.1. The personal data we collect from you or via third parties may be used for certain purposes, as follows:

(a) Where you are a buyer:

(ii) Providing Services

- To facilitate your use of the Services or access to the Platform;

- To administer your account (if any) with us;
- To display your name, username or profile on the Platform (including on any reviews you may post);
- To facilitate the use of the mini-apps available on the Platform and purchases made via these mini-apps;
- To respond to your queries, feedback, claims or disputes, whether directly or through our third party service providers;
- To display on scoreboards on the Platform in relation to campaigns, mobile games or any other activity;
- To allow other users to identify you (via the "Find my friends" or any other similar function) as a user of the Service, to allow you to find other users and to connect with them on the Platform, and to support the socialising function of the Services (where applicable);
- To assess your application for loan facilities and/or to perform credit risk assessments in relation to application for financing services (where applicable); and
- To facilitate the integration of third party's loyalty membership programmes (including those supported by sellers or brands) with our Platform.

(v) Analytics, research, business and development

- To understand your user experience with the Services and the Platform;
- To improve the layout or content of the pages of the Platform and customise them for users;
- To identify visitors on the Platform;
- To conduct surveys, including carrying out research on our users' demographics and behaviour;
- To improve our current technology (e.g. voice recognition tech, etc) via machine learning or other means;
- To derive further attributes relating to you based on personal data provided by you (whether to us or third parties), in order to provide you with more targeted and/or relevant information;
- To conduct data analysis, testing and research, monitoring and analysing usage and activity trends;
- To further develop our products and services; and
- To know our buyers better.

(vi) Other

- Any other purpose to which your consent has been obtained; and
- To conduct automated decision-making processes in accordance with any of the above purposes

NOTE 2: PROTECTION OF YOUR DATA

Security of Your Personal Data

7.1. To safeguard your personal data from unauthorised access, collection, use, disclosure, processing, copying, modification, disposal, loss, misuse, modification or similar risks, we have introduced appropriate administrative, physical and technical measures such as:

- (a) Restricting access to personal data to individuals who require access;
- (b) Maintaining technology products to prevent unauthorised computer access;
- (c) Using 128-bit SSL (secure sockets layer) encryption technology when processing your financial details; and/or
- (d) implementing other security measures as required by applicable law.

7.2. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.