

PRIVACY NOTICE

WELLOUS group (individually and collectively referred to as “**WELLOUS**”, “**The Company**”, “**we**”, “**us**” or “**our**”) is committed to safeguard your privacy as the service provider of the WELLOUS’s website and/or platform (“**Site**”). This Privacy Policy (the “**Policy**”) describes WELLOUS Site’s policies and procedures regarding the collection, use and disclosure of the information collected through WELLOUS’s services, and other affiliated websites owned and operated by WELLOUS (the site, and any products and services provided by WELLOUS’s Site are collectively referred to as the “**Services**”, which includes the technology platform, as defined below). By using our Services, you (hereinafter referred to as “**you**” or “**user**”) agree to the terms of this Policy.

1. What is Personal Data

In the course of engaging for our Services, we will request that you provide data and information about yourself and/or your organisation (“**Personal Data**”) to enable us to enter into transaction with you or to deliver the necessary services and/or deliverables in connection with our business.

Personal data means any data relates directly or indirectly to a data subject, who is identified or identifiable from that information or from that and other information in the possession of a data user, including any sensitive personal data and expression of opinion about the data subject; but does not include any information that is processed for the purpose of a credit reporting business carried on by a credit reporting agency under the Credit Reporting Agencies Act 2010.

Pursuant to Personal Data Protection Act 2010, sensitive personal data means any personal data consisting of information as to the physical or mental health or condition of a data subject, his political opinions, his religious beliefs or other beliefs of a similar nature, the commission or alleged commission by him of any offence or any other personal data as the Minister may determine by order published in the Gazette. We will not process your Sensitive Personal Data, unless you have given your “explicit consent” or where, for example, the processing is necessary for:

- (i) the purpose of any legal proceedings; or
- (ii) the purpose of obtaining legal advice; or
- (iii) establishing, exercising or defending the data user’s legal rights; or
- (iv) any other purposes e.g. promotional campaign or sales event

We do not intentionally gather Personal Data from visitors who are under the age of 13. If we learn that a child under the age of 13 has submitted Personal Data to WELLOUS’s Site, we will attempt to delete such data as soon as possible. If you believe that we might have any Personal Data from a child under 13, please contact us.

The following data is collected by or on behalf of WELLOUS:

(A) Data provided by users. This includes:

- We collect data when user access our Site and/or use our Services. This may include, without limitation to your name, email, phone number, username and password, address, profile picture, payment or banking information (including related payment verification information) and other government identification documents (which may indicate document numbers as well as birth date, gender, and photo). This also includes emergency contact information and user settings while using WELLOUS's Site. This also includes gender and/or occupation (when required for certain WELLOUS's Services or programs, if applicable).
- Demographic data: We may collect demographic data of the user, including through user surveys.
- User content: We collect the information user submit when you contact WELLOUS's customer support. This may include feedback, photographs or other recordings collected from the user.

(B) Data created during use of our Services. This includes:

- Location data: We collect precise location data from the user's hardware and/or mobile device if you enable us to do so. WELLOUS collects this data from the time a purchase order is made and delivery is requested until it is finished, and at any time the Site is running in the foreground of your hardware and/or mobile device. We use this data to enhance your use of our Sites, including to enable safety features, and prevent and detect fraud.
- Transaction information: We collect transaction information related to the use of our Services, including the type of Services requested or provided, date and time the Services were provided, amount charged, and payment method.
- Usage data: We collect data about how user interact with our Services. This includes data such as access dates and times, Site features or pages viewed, Site crashes and other system activity, type of browser, and third-party sites or Services used before interacting with our Services. In some cases, we collect this data through cookies, pixels, tags, and similar tracking technologies that create and maintain unique identifiers.

Like many online services, we use cookies to collect information. "**Cookies**" are small pieces of information that a website sends to your computer's and/or mobile device's hard drive while you are viewing the Site. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer and/or mobile device until you delete them) to provide you with a more personal and interactive experience on our Site. Site areas is accessible only to the user when your browser accepts Cookies. WELLOUS's Site uses Cookies to

verify that you are properly signed in, to display information for your primary location, and to highlight your preferences, for example. We may also use Cookies from time to time to measure your response to new aspects of the WELLOUS's Services and/or emails in an effort to continually improve customer service and WELLOUS's Services usability. Please be aware that a Cookie cannot spread computer viruses, retrieve any other data from your hard drive, or capture your email address.

You can erase or block Cookies from your computer and/or mobile device if you wish to do so (your internet browser help screen or manual will thoroughly explain this process), but certain parts of the WELLOUS's services, as well as parts of the Site, may not work correctly or will not work at all if your browser is set not to accept Cookies.

- Device data: We may collect data about the device used to access our Services, including the hardware models, device IP address, operating systems and versions, software, preferred languages, unique device identifiers, advertising identifiers, serial numbers, device motion data, and mobile network data.

(C) Data from other sources. This includes:

- User feedback, such as ratings, feedback, or compliments.
- WELLOUS's account owners who request services for or on behalf of other users, or who enable such users to request or receive services through their accounts.
- Users or others providing information in connection with claims or disputes.
- WELLOUS's business partners through which users create or access their WELLOUS's account, such as payment providers, social media services, or Sites or websites that use WELLOUS's APIs or whose APIs WELLOUS's uses.
- Service providers who help us verify users' identity and background information for regulatory, safety, and security purposes.
- Insurance for delivery persons.
- Publicly available sources.
- Marketing service providers.

WELLOUS may combine the data collected from these sources with other data in its possession.

2. Purpose of Collection of Personal Data

Personal Data that you provide will be collected, used and otherwise processed by us for, amongst others, the following purposes:

- a. the shipping and/or delivery of products, goods, services or deliverables and the marketing of such services or deliverables whether present or future, to you;
- b. to facilitate payment for our WELLOUS's Services and/or products;
- c. user or client relationship management procedures under the WELLOUS's Site;
- d. our internal record keeping;
- e. meeting any legal or regulatory requirements relating to our provision of services and deliverables, and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us; and
- f. enable us to send you information by e-mail, telecommunication means (telephone calls or text messages) or social media about products and services offered by us that we think may interest you.

3. What are the effects arising from failure to provide Personal Data?

The failure to supply such Personal Data will/ may:-

- a. result in us being unable to provide you with the services requested under WELLOUS's Services; and
- b. result in us being unable to update you on legal developments, our Services and/or launches.

4. Disclosure

Personal Data provided to us will generally be kept confidential but you hereby consent and authorize us to provide or disclose Personal Data to the following categories of parties:-

- a. any person to whom we are compelled or required to do so under the law or in response to a competent regulatory or government agency or in compliance of an order of a court;
- b. government agencies, statutory authorities and industry regulators;
- c. our auditors, consultants, accountants, insurers, lawyers, or other financial or professional advisers;
- d. our sub-contractors or third party service or product providers as may determine to be necessary or appropriate;

Users are to note that the processing of Personal Data in certain instances have been excluded from compliance with the Disclosure Principle and we will disclose Personal Data that we

collected when any of the circumstances below occurs. These instances and/or circumstances are as follows:

- a. where personal data is processed for the prevention or detection of crime or for the purpose of investigations; or
- b. where personal data is processed for the apprehension or prosecution of offenders; or
- c. where personal data is processed for the assessment or collection of any tax or duty or any other imposition of a similar nature; or
- d. where personal data is processed for the preparation of statistics or carrying out research (subject to the personal data not being processed for any other purpose and the resulting statistics or the results of the research being anonymised); or
- e. where personal data is processed for the purpose of or in connection with any order or judgment of a court; or
- f. where personal data is processed for the purpose of discharging regulatory functions; or
- g. where personal data is processed for journalistic, literary or artistic purposes.

5. Security measures

We will keep and process Personal Data in a secure manner. We endeavour, where practicable, to implement the appropriate administrative and security safeguards and procedures in accordance with the applicable laws and regulations to prevent the unauthorized or unlawful processing of Personal Data and the accidental loss or destruction of, or damage to, such Personal Data. The steps will be taken in consideration of the following:

- (i) nature of the Personal Data and the harm that would result from the lost, misuse, modification, unauthorised or accidental access or disclosure;
- (ii) the location where the Personal Data is stored;
- (iii) the security measures incorporated into the equipment in which the Personal Data is stored;
- (iv) the measures taken for ensuring the reliability, integrity and competence of personnel having access to the Personal Data; and

- (v) the measures taken for ensuring the secure transfer of the Personal Data.

6. Rights of Access and Correction

You have the right to request access to and correction of Personal Data held by us subject to 7 days prior written notice is given to us and in this respect, you may:

- (i) check whether we hold or use such Personal Data and request access to such data;
- (ii) request that we correct any Personal Data that is inaccurate, incomplete or out-of-date;
- (iii) request that we specify or explain its policies and procedures in relation to data and types of Personal Data handled by us.

7. Retention of Personal Data

We will process the Personal Data for the abovementioned purposes only and will not keep the Personal Data longer than is necessary for the fulfilment of that purposes. We are responsible to take all reasonable steps to ensure that all Personal Data is destroyed or permanently deleted in the event that you decided to cease using WELLOUS's Services and the Personal Data is no longer required for the purposes for which it was to be processed.

8. Data Integrity

We will take reasonable steps to ensure that the Personal Data is accurate, complete, not misleading and kept up-to-date by having regard to the purpose for which the Personal Data is collected and further processed.

9. Language of this Policy

This Policy may be prepared in different languages version. In the event of any conflicts in interpretation between the different versions, the English version will prevail to the extent of the conflict.