

## SourceSage's Data Protection Policy

### Respecting your privacy and protecting your personal data

SourceSage collects information to understand your needs better. This helps us to improve our services and the way we communicate with you.

We know that privacy is important to you and we strive to be as open and transparent as possible in how we serve you.

We conduct our business in compliance with the Personal Data Protection Act (PDPA) and have implemented additional measures to protect your personal information.

SourceSage's Data Protection Policy aims to help you understand how we collect, use, share and protect your personal information.

### Ways we collect your personal information

We may collect your personal information when you:

- Subscribe to our services
- Use our network and other SourceSage's products or services
- Register for a specific product or service (e.g. registering your interest to purchase handsets)
- Sign up for alerts or newsletters
- Contact us with a question or request for assistance
- Participate in a competition, lucky draw or survey
- Visit our websites *and applications (through the use of cookies / mobile advertising IDs and other technologies)*

### The information we collect

The information we collect depends on the SourceSage's products and services you use and subscribe to. Here are key examples:

- **Your identity** – For customers purchasing on one of SourceSage Online Stores, this includes name, mobile number, e-mail address, *that you may have submitted*, as well as service-related information such as device ID and IP address (Credit Card details are collected by third party payment gateway which complies with PCI-DSS). For merchants which set up an Online Store with SourceSage, this includes name, mobile number, email address, designation, company name, as well as company-related information such as corporate registration number, corporate address, turnover, industry, products/services information, and its pricing.

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Website: <https://sourcesage.co>, Email: [onlinestore@sourcesage.co](mailto:onlinestore@sourcesage.co)

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- **Your interaction with us** – For example, a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us.
- **Your account information** – For example, the subscription services you use or other details related to your account.
- **Information on your use of our services** – For example, the phone numbers you call or send text messages to and vice versa, as well as the date, time and duration of your calls through our network and the approximate location of your mobile device.
- **Information on equipment and our network** – For example, information on the performance of your device on our network.
- **Your preferences** – This is based on what you share with us on how you would like to be contacted, and your preferred products, and service.
- **Information from other organisations** – These organisations include fraud-prevention agencies, business directories, credit reference agencies or individuals we believe you have authorised to provide your personal details on your behalf.

## How we use your information

We may use your information for:

### **Provisioning & administration of services**

- Process your orders and activate or deactivate services
- Enable us to process bills and payments
- Respond to enquiries and requests from you or people you have authorised
- Inform you about service upgrades and updates
- Provide directory assistance
- Facilitate interconnection and inter-operability with other telecommunications operators
- *Verification of identity*
- *Store information for performing certain functions such as completing forms, facilitating website navigation, authentication, and enabling marketing and advertising technology*

## **Market research, network & service enhancement**

- Conduct market research and customer satisfaction surveys to improve our customer service; develop new products, as well as personalise the services we offer you
- Improve our network, for example by looking at usage and mobility patterns
- \*Perform market analysis
- *Improve your user experience based on your usage behaviour on our websites and applications*

*(\*Upon request from private and public organisations, we may provide information collected as described above for their planning purposes. The information included within any reports to these organisations is always aggregated and anonymised such that no particular individual is identifiable.)*

## **Sharing of rewards and benefits**

- Offer rewards and promotions, and share promotional benefits and loyalty programs which you may qualify for
- Provide updates, offers, invitations to events and deliver relevant advertising, including through voice, SMS and *digital advertising* with your prior consent or if otherwise permitted under local laws and regulations

## **Security and risk management**

- Inform you of service and security issues
- Prevent and detect fraud or other crimes and recover debts
- Conduct internal audits *and determine creditworthiness*
- Ensure the safety and security of our properties and systems
- Conduct checks against money laundering, terrorism financing and related risks

## **Legal & regulatory requirements**

- Meet legal, regulatory and other requirements including providing assistance to law enforcement, judicial and other government agencies

We will not use your personal data for purposes other than what we have informed you, or which are permitted under local laws and regulations.

We will not offer, publish or share your personal data with third parties outside of the SourceSage for commercial purposes, without seeking your explicit permission.

We will retain your information for only as long as there is a business or legal need.

## Sharing your information

We may share your information with:

- Merchants on SourceSage
- Business partners and vendors we work with to deliver services you have subscribed to
- Industry regulators and other government organisations, as required by local laws and regulations
- Financial institutions for purposes such as facilitating GIRO payments or financing
- Payment Gateways
- Logistics Companies
- Research institutions for market analysis purposes
- Credit reference bureaus for the purpose of preparing credit reports or evaluation of creditworthiness

Your information is disclosed to the above only for relevant purposes (please refer to those mentioned in this Policy) or to protect the interests of our customers.

In some cases, we encrypt, anonymise and aggregate the information before sharing it.

Anonymising means stripping the information of personally identifiable features.

Aggregating means presenting the information in groups or segments e.g. age groups.

We will also ensure that overseas organisations we work with observe strict confidentiality and data protection obligations.

## Protecting your information

We have implemented stringent measures to secure and protect your information.

These include:

- Safeguards to prevent security breaches in our network and database systems
- Limits on access to information in our systems and the systems of our business partners and vendors
- Strict verification processes to prevent unauthorised access to information

## Respecting your contact preferences

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SourceSage is committed to complying with the Do Not Call (DNC) provisions. We have always been mindful of engaging our customers in a more targeted and relevant way.

We may send marketing messages to your Singapore telephone number if:

1. you have given us consent, OR
2. you have not registered with the national DNC Registry, OR
3. the sending of such messages is permissible under applicable laws and regulations.

Our marketing messages aim to update you about our exclusive offers, rewards programme and special deals from our preferred partners and advertisers. Please note that after opting out, you may still continue to receive non-marketing messages, such as product updates and service notices as permitted under applicable local laws and regulations.

*You may configure your browser setting to disable all cookies and mobile advertising IDs, including cookies and mobile advertising IDs associated with our services. However, it is important to remember that some of our services may not function properly if your cookies and/or mobile advertising IDs are disabled.*

## **Questions?**

Feel free to contact our Data Protection Officer at [onlinestore@sourcesage.co](mailto:onlinestore@sourcesage.co)

## **General Information**

We may amend or modify this Policy from time to time, such as in response to changes to legislation. We remain committed to safeguarding your information and being open about our data protection practices.

This Policy is to be read together with our Terms and Conditions and applies to all products and services provided by SourceSage under the Terms and Conditions of Services.

Capitalised terms in this Policy have the meanings given to them in the Terms and Conditions unless otherwise defined. “We”, “our” and “us” refer to all Merchants on SourceSage.



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Please note that different or separate data protection policies may apply to specific products and services provided by SourceSage. Please refer to the terms of use for specific products and services for more information.