

Company Information / Identification

Please access here:

<https://drive.google.com/file/d/1SBJKokee8vi3DUCIAA7VvMQxbt73kBnT/view?usp=sharing>

Privacy Policy

Using draft from Palm Gate Asia Oct 2021 to - now V1 for Value Vitality Club at May 2025

Value Vitality Club Pte. Ltd 's Privacy Policy

At Value Vitality Club Pte. Ltd we respect your privacy and aim to comply with the requirements of the Personal Data Protection Act ("PDPA") of Singapore. This privacy policy (this "Privacy Policy") explains how Value Vitality Club Pte. Ltd ("Value Vitality Club Pte. Ltd") collects and uses your personal data, and the measures that we take to secure your personal data. For the purpose of this policy, the terms "we", "us" or "our" shall, unless otherwise indicated, refer to Value Vitality Club Pte. Ltd.

What is personal data?

Personal data refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an individual, company, association or body of persons, corporate or unincorporated, has or is likely to have access. Examples of personal data are your name, NRIC number or FIN number, address, telephone numbers, personal email addresses, photographs or video images.

Consent to be bound

When you provide your personal data to Value Vitality Club Pte Ltd. In the manner set out below (including but not limited to the submission of an application form relating to membership or attending an event via invitation through Value Vitality Club Pte. Ltd) or requesting to be included on our mailing list), you hereby consent to be bound by this Privacy Policy. If you do not accept any term in this Privacy Policy or do not agree to be bound by this Privacy Policy, please do not provide your personal data to Value Vitality Club Pte. Ltd. Please note that in such cases, Value Vitality Club Pte. Ltd may not be able to process your application or provide you with any of the services or deal with you in the manner set out below.

Where you are providing personal data of an individual other than yourself, you warrant and represent to Value Vitality Club Pte. Ltd that you have obtained their consent to the disclosure of their personal data to Value Vitality Club Pte. Ltd. Value Vitality Club Pte. Ltd may require you to provide written confirmation from the individual or seek confirmation directly from the individual that he or she has consented to the use of his or her personal information.

How will your personal data be collected?

Value Vitality Club Pte. Ltd collects personal data in the following ways:

- i. when you submit a connection form on our website
- ii. when you email us directly or amend your personal particulars
- iii. when existing clients provide us with references about you e.g. Introductions through our direct partnerships or sustain-tech ecosystem of VC's, incubators or accelerators.
- iv. when you interact with us such as via emails, letters, telephone calls, and face-to-face meetings
- v. when you make purchases of merchandise
- vi. when you make a booking to use Value Vitality Club Pte. Ltd services, facilities or F&B outlets, or to charter a yacht
- vii. when you participate in our events, or surveys.
- viii. when you apply for a job at Value Vitality Club Pte. Ltd
- ix. when we obtain your personal data from third parties in certain situations with your consent
- x. when you visit our website
- xi. when you submit your personal data to us for any other reasons

What is your personal data collected, used or disclosed for?

Value Vitality Club Pte. Ltd collects, uses and discloses your personal data for the following purposes, including but not limited to:

- i. processing client requests
- ii. fabricating of introductions or strategic partnerships (with your prior consent)
- iii. complying with internal policies and procedures
- iv. responding to your queries and requests from you or individuals you have authorised
- v. sending you updates, information, marketing and advertising material pertaining to services, events and activities offered by Value Vitality Club Pte. Ltd, affiliate partners, and third parties with your prior consent
- vi. contacting you about feedback you have provided
- vii. conducting client credit checks
- viii. facilitating the use of our services, facilities and participation in our events and activities
- ix. preventing, detecting and investigating crime such as fraud
- x. the performance of financial/operational services for Value Vitality Club Pte. Ltd by agents or third-party service providers
- xi. providing clients access to worldwide "Preferred Access" to meetings managed by Value Vitality Club Pte. Ltd, or our partners
- xii. enforcement of security checks and provision of access to Value Vitality Club Pte. Ltd networks
- xiii. other purposes of use, for which we have obtained your consent, express or implied
- xiv. for the purpose of contact tracing in accordance with the recommended industry practice

By providing your personal data to Value Vitality Club Pte. Ltd, you hereby consent to Value Vitality Club Pte. Ltd collecting, using or disclosing the personal data for the purposes stated above.

We Do not collect your information automatically when you access or use the Site, including:

We Collect your information automatically when you access or use the Site, including:

- i. **Log in Information:** we may collect information about your use of the Site, including the type of browser you use, the times at which you accessed our site, the pages of our Site that you viewed, your IP address, and the page you visited prior to visiting our Site.
- ii. **Device Information:** we may collect information about the computer or mobile device ("Device") that you used to access our Site with, including the hardware model of the Device and the version of the operating system used, unique device identifiers (including but not limited to the IP address, IMEI number, the address of the Device's wireless network interface, and/or mobile phone number used by the Device) and information relating to which mobile network your Device was on.
- iii. **Location Information:** we may collect information about your Device's location each time you access or use one of our mobile applications. You may turn off location services for your Device at any time, but this may turn off some of the useful features that our mobile application offers.
- iv. **Information Collected by Cookies, Web Beacons and Other Tracking Technologies:** we and/or our service providers use cookies, web beacons and other various technologies to collect information about your visit to our Site. Cookies are small data files that are stored in your hard drive or otherwise in your Device's memory that help us see which areas and features of our Site are popular and count visits, thus allowing us to improve our Site and your experience when you visit it. Web beacons are electronic images that may be used when you use our services or when you receive our emails that help deliver cookies, count visits and understand your usage of our Site and our services. They help us assess the effectiveness of our campaigns and how we may better improve our Site and services for you.

Third parties

Personal data that you provide will be provided to affiliate partners and third parties in connection with any services provided by these parties (including without limitation, third party payment processing companies, mobile short-messaging-system providers, anti-money laundering watchlist database providers and the relevant authorities). Such services would include the maintenance of our websites or platform, monitoring platform activity, provisions of platform content or client database, and storage of client information. Whilst care would be taken to require that some of these third parties (to the extent possible, with relevant authorities exempted) provide an undertaking on compliance with the PDPA and

applicable personal data protection regulations, Value Vitality Club Pte. Ltd will not be able to provide any warranties on the manner or care in which these third parties maintain, protect or utilise your personal information.

Additionally, Value Vitality Club Pte. Ltd shall be entitled to collect, use or disclose your personal data without your consent if required to do so or permitted, by law.

Accessing and Making Correction to Your Personal Data

You may write in to us, based on reasonable grounds, to find out how we have been using or disclosing your personal data. We are obligated under the PDPA to allow you access to your personal data of the past one year, and to make any correction if there is any error or omission. Before we accede to your request, we may need to verify your identity by checking your NRIC or other legal identification document. We will try to respond to your request within 30 days. By which time we will give you an estimate of how long it is going to take to retrieve all the relevant data, and how much we will charge you for processing the request.

Accuracy of your personal data

We will take reasonable precautions and verification checks to ensure that the personal data we have collected from you is reasonably accurate, complete and up-to-date. From time to time, we will do a verification exercise for you to update us on any changes to your personal data. If you are a client or partner, it is important that you update us if there are any changes in your personal information.

How is your personal data protected?

We are committed to protecting and respecting your personal data. We take reasonable steps to safeguard your personal data from loss, misuse, disclosure or unauthorised access by locking the relevant file cabinets containing the personal data of Value Vitality Club Pte. Ltd's clients and partners, restricting access to our offices, preventing unauthorised computer access, installing password-protected access by authorised users, installing firewalls and anti-virus software, restricting access to personal data to only staff who need such access to perform their day to day functions, requiring third party service providers to execute confidentiality agreements and conducting training for the staff.

The website may utilize automated tracking devices or software such as a "cookie". By using the website, you are deemed to have consented to our use of such cookies. If you do not wish to receive cookies, please configure your internet browser to erase all cookies from your computer, to block all cookies or to receive a warning before a cookie is stored.

The website contains links to other websites which are not maintained by Value Vitality Club Pte. Ltd. Similarly, other websites may contain links to this website. Value Vitality Club Pte. Ltd has no control over such sites and resources, and you acknowledge and agree that Value Vitality Club Pte. Ltd is not

responsible for the privacy practices or contents of those websites.

Value Vitality Club Pte. Ltd does not represent or warrant that the website or its contents are free of errors, infection by computer viruses, and/or other harmful or corrupting code, program, macro and such other unauthorized software. You agree not to hold Value Vitality Club Pte. Ltd liable for the disclosure of any such information or other personal information that is due to any circumstances beyond the control of Value Vitality Club Pte. Ltd.

Retention of Personal Data

We will not retain any of your personal data under our charge or control when it is no longer necessary for any business or legal purposes. We have a Document Retention Policy that spells out how long we ought to retain each type of confidential document or personal data. Certain retention periods are based on statutory or regulatory requirements.

We will ensure that your personal data that no longer has any business or legal use will be destroyed or disposed of in a secure manner. This applies to both paper documents and electronic data stored in databases.

Transfer of Personal Data

If there is a need for us to transfer your personal data to another country, we will obtain your consent before transfer. We will ensure that the standard of data protection in the recipient country is comparable to that of Singapore's PDPA. If this is not so, we will enter into a contractual agreement with the receiving party to accord similar levels of data protection as that in Singapore.

Do-Not-Call (DNC) Provisions and Telemarketing Activities

We will only contact you via voice call, text message or facsimile, sending you updates, information, marketing and advertising material pertaining to facilities, services, events and activities offered by Value Vitality Club Pte. Ltd, affiliate partners and third parties with your prior consent.

How do you withdraw your consent or update your personal data?

Should you not want Value Vitality Club Pte. Ltd to continue using and/or disclosing your personal data for the above purposes, you may at any time, provide us with written notice informing us of your decision to withdraw your consent from the use of personal data by Value Vitality Club Pte. Ltd and/or its third-party service providers and/or agents. Please contact our Data Protection Officer natalie@palmgateasia.com for the withdrawal of your consent for the use of your personal data.

By withdrawing your consent, you acknowledge and agree that Value Vitality Club Pte. Ltd may not be able to continue maintaining, administering or furthering your membership effectively and/or you may miss or fail to receive relevant notices and messages relating to your ongoing relationship with Value

Vitality Club Pte. Ltd.

Value Vitality Club Pte. Ltd reserves the right to supplement, vary or amend this Privacy Policy from time to time without further notice. Changes to this Privacy Policy will be posted on www.palmgateasia.com and the date at the top of this Privacy Policy will be revised. It is your responsibility to review this Privacy Policy to ensure you are aware of any changes made by Value Vitality Club Pte. Ltd.

If you would like to access, correct, amend or delete any personal data we have about you, register a complaint, or simply want more information, please contact our Data Protection Officer.

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For Citizens of the European Union

If you are a citizen of the European Union, kindly refer to our policy on the "Rights of Data Subject under the General Data Protection Regulations (GDPR)".

Rights of Data Subject under the General Data Protection Regulations (GDPR)

If you are a resident in the EU, you may have certain rights in relation to the Personal Data Value Vitality Club Pte. Ltd holds about you.

These rights include:

- **The right of access**

You have the right to be provided full information about your personal data that Value Vitality Club Pte. Ltd holds, and certain information about how Value Vitality Club Pte. Ltd uses it and who Value Vitality Club Pte. Ltd shares it with.

Before Value Vitality Club Pte. Ltd attends to your request, Value Vitality Club Pte. Ltd may need to verify your identity by checking your legal identification document. Value Vitality Club Pte. Ltd will try to respond to your request within 30 days. By which time Value Vitality Club Pte. Ltd will give you an estimate of how long it is going to take to retrieve all the relevant data, and how much Value Vitality Club Pte. Ltd will charge you for processing the request.

Value Vitality Club Pte. Ltd may not provide you with certain personal data if providing it would interfere with another's rights (e.g. where providing the personal data Value Vitality Club Pte. Ltd holds about you would reveal information about another person) or where another exemption applies.

- **The right of data portability**

You may have the right to receive your personal data in a structured and commonly used readable format and a right to request that Value Vitality Club Pte. Ltd transmit such personal data to another party.

If you wish for us to transmit the personal data to another party, please ensure you detail that party and note that Value Vitality Club Pte. Ltd can only do so where it is technically feasible. Value Vitality Club Pte. Ltd are not responsible for the security of the personal data or its processing once received by the third party.

- **The right of rectification**

You have the right to require that Value Vitality Club Pte. Ltd corrects any incorrect information Value Vitality Club Pte. Ltd holds about you.

- **The right of erasure**

You may also have the right to ask that Value Vitality Club Pte. Ltd delete your personal data, if

- i. you believe that it is no longer necessary for us to hold the personal data about you
- ii. you wish to withdraw your consent from Value Vitality Club Pte. Ltd to continue using and/or disclosing your personal data for the above purposes, you may at any time, provide us with written notice informing us of your decision to withdraw your consent from the use of personal data by Value Vitality Club Pte. Ltd and/or its third party service providers and/or agents

By withdrawing your consent, you acknowledge and agree that Value Vitality Club Pte. Ltd may not be able to continue maintaining, administering or furthering your membership effectively and/or you may miss or fail to receive relevant notices and messages relating to your ongoing relationship with Value Vitality Club Pte. Ltd.

- **The right to restrict processing**

You have a right to require us to stop processing the personal data Value Vitality Club Pte. Ltd hold about you in certain circumstances, if

- i. you believe the personal data is not accurate, for the period it takes for us to verify whether the personal data is accurate
- ii. you wish to erase the personal data as the processing of the personal data is unlawful
- iii. you wish to erase the personal data as it is no longer necessary for any business purpose

- **The right to object**

You may have the right to object to the use of your personal data by us to send you promotions, special offers, and marketing messages.

- **The right not to be subjected to automated decision-making (including profiling)**

You may have the right not to be subjected to the use of your personal data by us where we build profiles for purposes such as promotions, special offers, marketing.

Exercising your rights

To exercise your rights, or if you require further information about how your personal data is used by us, please contact our Data Protection Officer at natalie@palmgateasia.com

Data Breach Notification

In the event whereby Value Vitality Club Pte. Ltd has credible grounds to believe that a data breach has occurred (whether through self-discovery, alert from the public or notification by our data intermediary), we will take reasonable and expeditious steps to assess whether the data breach is notifiable under the PDPA within 30 calendar days.

Feedback and Data Protection Officer

Should you have any feedback or enquiries relating to your personal data, please contact our Data Protection Officer at natalie@palmgateasia.com