# **Privacy Policy**

This Privacy Policy applies to Kris+ Pte Ltd ("**KPL**").

KPL is a corporation registered in the Republic of Singapore with company number 202117920C and a registered office at Airline House, 25 Airline Road, 819829, Singapore.

We collect, use and disclose Customer Data (as defined below) when you access our website, make purchases or use our Kris+ mobile application ("**Mobile App**"), or access, view or use any content on the Mobile App including when you convert KrisFlyer miles to KrisPay miles (and vice versa) or convert partner points to KrisPay miles, to be stored in your KrisPay Wallet, and in order to provide you with our lifestyle rewards and payments programme and to facilitate the provision of our goods and services (collectively, the "**Services**"). The collection, use and disclosure of Customer Data enables us to provide our Services for the Purposes set out below. This Privacy Policy outlines KPL's policy and responsibility in relation to the collection, use and disclosure of Customer Data.

By continuing to use our Services, you acknowledge and agree that you have read and understood this Privacy Policy and you provide your consent to us collecting, using and disclosing your Customer Data in accordance with this Privacy Policy.

# 1. What information do we collect about you?

We collect Customer Data from other entities within the Singapore Airlines Limited ("**SIA**") group of companies, which include Scoot Pte. Ltd., KrisShop Pte. Ltd. and Encounters Pte Ltd (collectively with SIA, the "**SIA Group**") or when you access, use or sign up to our Services. The types of personal data we collect includes, but is not limited to:

- personal data that can be used to identify an individual, such as name, gender, date of birth, nationality, passport or other personal identification numbers, citizenship and country of residence;
- contact information, such as mailing address, phone number, email address;
- payment information, such as tokenized credit or debit card information (via Apple Pay & Google Pay), including the tokenized name of cardholder, card number, billing address and expiry date;
- travel information, such as ticket numbers, destinations, flight information, accrual, and redemption transaction history on the KrisFlyer Programme;
- your customer preferences, such as information on your Kris+ purchases (including the transaction dates, channel in which purchase was made, KrisFlyer miles accrued) and membership details (including membership tier and membership tier qualification status), places that you would like to visit or other service preferences;
- information you choose and/or consent to submit when you use features on our website, Kris+ mobile applications, or other online facilities;
- information we receive from other sources e.g., our page on social media websites and our contractual partners.

### (collectively, "Customer Data").

Your failure to provide the required Customer Data may cause your inability to use our Services normally.

We also collect information about your preferences (at your option) from your interactions within our website or Kris+ mobile application. In addition, we collect device and technical information (e.g., cookies, IP addresses or other unique identifiers) from you, and any other information you may submit when you use our website or Kris+ mobile application for the Purposes (as defined below). Refusing to provide such optional information will only render the relevant special feature unavailable to you but will not affect your use of our basic services.



# 2. How will we use your Customer Data?

We use your information to provide our Services to you or otherwise deliver any other products or services you have requested for or signed up to, and to administer your membership with our Kris+ lifestyle rewards and payments programme. We collect, use and disclose your Customer Data for the following purposes:

- To facilitate account creation and to manage your Kris+ account;
- To fulfil a contract, or take steps linked to a contract, including when dealing with any third
  parties in connection with providing the Services to you. This is relevant where you transact
  with us and includes verifying your identity, taking payments, communicating with you, or
  facilitating requests for retro-credit accrual of miles;
- To better understand your preferences and personalise our Services for you;
- To fulfil your payment requests, orders and respond to your requests;
- To provide operational and logistical support to facilitate your use of the website, our Kris+ mobile application and/or the provision of our Services;
- To improve our Services and that of entities within the SIA Group;
- To inform you of promotions and market our Services to you and those of our group companies, partners and agents via a number of channels, including mail, telemarketing, email, SMS, push notifications, or other digital channels. (You may click the "unsubscribe" button in these messages, update your preferences in the Kris+ app settings, or email us using the contact details set out at Section 6 'Contact Us' should you wish to stop receiving marketing communications);
- To comply with applicable legal and regulatory obligations, carry out internal audits or investigations, prevent fraud or other unlawful activities, or ensure the safety and security of you and us;
- To fulfil purposes that are reasonably necessary or ancillary to the abovementioned purposes; and
- To fulfil any other purposes which we may have notified you prior to, or at the time of, obtaining your consent.

#### (collectively, "Purposes").

We only use your passport number and other national identification information where this is required by applicable law, or where we need to verify individual identifies to a high degree of fidelity to prevent fraudulent claims or transactions. We will only do so where we have assessed that there is no suitable alternative to collecting or using such national identification information, and that a failure to accurately identify an individual to a high degree of fidelity could pose significant safety or security risks, or a risk of significant impact or harm to any individuals or to us.

### 3. Who do we share your Customer Data with?

We share your Customer Data with our third-party service providers, to the extent necessary for them to provide their ancillary services for us to fulfil the Purposes, such as:

- the SIA Group;
- merchants;
- payment processing and fraud detection services;
- web hosting services;
- cloud storage and IT support; and
- maintenance of our mobile application systems.

We use these third parties' services solely to process or store your Customer Data for the Purposes.

We may also share your Customer Data where required by applicable law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator or any other legal process served on us.



# 4. How long do we retain your Customer Data?

We retain your information for as long as it is necessary to fulfil the Purposes, for any other legal or business purposes of KPL, or as required by applicable laws.

# 5. Third Party Links

Our website and mobile applications may contain links to third-party websites. This Privacy Policy does not apply to those third-party websites. Please read the privacy policies of any of the other websites that you visit as we are not responsible for the privacy practices of those websites. This includes the privacy practices of Singapore Airlines Pte Ltd.

# 6. Contact Us

Please contact us at: <u>dpo@singaporeair.com.sg</u>

- if you have any feedback or enquiries about your Customer Data and/or this Privacy Policy; or
- if you would like to correct any Customer Data held about you that is inaccurate, so as to ensure that we can maintain an accurate record of the Customer Data in our possession and/or control. Alternatively, you may also correct any Customer Data held about you that is inaccurate by logging onto your account on our website and/or Kris+ mobile application.

# 7. Updates

We will amend this Privacy Policy from time to time, and the updated versions will be posted on our website and Kris+ mobile application; and date stamped so that you are aware of when the Privacy Policy was last updated. Please check back frequently to see any updates or changes to this Privacy Policy. If we make any material changes to this Privacy Policy, we will provide notice via email notification.

### 8. Jurisdiction-specific terms

If you are using our Services to which the laws of the jurisdictions set out below apply, the terms set out below apply to you in addition to the terms set out above and, in the event of a conflict, the additional terms below shall prevail.

### A. AUSTRALIA

These jurisdiction specific terms apply in Australia to personal information collected by KPL. To the extent there is inconsistency between this section and the Privacy Policy, this section will prevail to the extent the Australian Privacy Act applies.

In this part:

- "Australian Privacy Act" means the Privacy Act 1988 (Cth);
- "Australian Privacy Principles" or "APPs", mean the "Australian Privacy Principles" set out in Schedule 1 to the Australian Privacy Act;
- "**personal information**" has the meaning given to that term in section 6(1) of the Australian Privacy Act; and
- "sensitive information" has the meaning given to that term in section 6(1) of the Australian Privacy Act.

KPL will comply with the Privacy Act to the extent it applies to the personal information of users of the Services (or any of our apps, websites, features and other services) where the Privacy Act applies.

#### 1. Sensitive information

We only collect the following sensitive information: biometric information, for the purpose of enabling biometric login to the Mobile App via FaceID.

By providing your "sensitive information", you consent to our collection of the information and use and disclosure of the information in accordance with this Privacy Policy directly related to the purposes for which it was collected.

### 2. Direct marketing

We, or our related bodies corporate, or third party service providers on behalf of us or our related bodies corporate, may contact you directly with related news, information and special offers of either our Services or the services of our related entities. If you are a user of the Services and you have selected the relevant consent to receiving marketing communications, then you consent to us (or our related bodies corporate or third party service providers on behalf of us or our related bodies corporate) using your personal information (but not sensitive information) for the purpose of sending you such information or promotions, including by way of mail, telemarketing, email, SMS, push notifications, or other digital channels. If at any time you no longer wish to receive marketing communications from KPL, you may click the "unsubscribe" button in the relevant marketing messages (for all digital marketing messages), for push notifications by updating your preferences in the Kris+ app settings, or you may email us using the contact details set out at Section 6 ('Contact Us') above.

#### 3. Overseas disclosure

Personal information that we collect is held on servers in electronic databases that are located in Singapore and are managed by our related entities and/or service providers.

We may also disclose personal information to recipients described in this Privacy Policy, some of which may be located outside of Australia, including to our related bodies corporate or service providers, in the following countries: Singapore, and others as notified to you from time to time.

Except if an exception under the Privacy Act applies, we will comply with our obligations under the Privacy Act in relation to disclosures outside Australia, including using reasonable efforts to ensure that such third parties only use your personal information as reasonably required for the purpose it was collected and in a manner consistent with the Privacy Act.

### 4. Access and correction

Upon your request (using the contact details set out at Section 6 ('Contact Us') above, we will provide you with access to, and you may seek correction of, the personal information that we hold about you. We will respond to such request as soon as practicable and in any case no later than 30 days after we receive the request.

### 5. Privacy complaint

If you would like to make a privacy complaint about an alleged breach of the APPs, or this Privacy Policy, contact details are set out at Section 6 ('Contact Us') above.

If you make a privacy complaint, we will verify your identity and may request further information from you. We will aim to resolve any privacy complaint within 30 days from when we receive all the information we require to consider your complaint. You may also make a complaint to the Office of the Australian Information Commissioner in relation to us by contacting the following details:

Office of the Australian Privacy



Commissioner ABN: 85 249 230 937

Online form:Privacy ComplaintCall:1300 363 992Address:GPO Box 5288 Sydney, NSW 2001

#### 6. Updates

We may amend this Privacy Policy from time to time. However, when we do, we will notify you when the updated versions are posted on our website and Kris+ mobile application. Your continued use of the Services will be deemed acceptance of these amendments.

We will seek your express consent prior to making any changes in the way we use or manage your sensitive information.

#### 7. Storage of personal information and security

We take reasonable steps to protect all personal information that we hold from misuse, interference, loss and from unauthorised access, modification, or disclosure. We store personal information in a combination of computer storage facilities, paper-based files and other records and we take reasonable precautions to store an individual's personal information in reasonably secure infrastructure, including cloud storage.

We maintain reasonable physical security over paper and electronic data. We also maintain reasonable computer and network security systems. We take reasonable steps to destroy or de-identity information that we no longer require.

The internet is not a secure method of transmitting information. Accordingly, other than where we use secure socket layer technology (SSL) to ensure information is securely transmitted and processed, we cannot and do not accept responsibility for the security of information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

When we are no longer required to retain your personal information per above, we will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.