

DATA PROTECTION NOTICE FOR CUSTOMERS

This Data Protection Notice (“**Notice**”) sets out the basis which *InVivos Pte Ltd* (“**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

PERSONAL DATA

1. As used in this Notice:

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include name, email address, telephone number, business address, curriculum vitae and Internet Protocol addresses (“**Personal Data**”). This includes when you visit the website with cookies-enabled, submit a CV, job application or any comment, questions or feedback to use and disclosing of your personal data to us through the website in any way.
3. Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).
5. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
 - (b) verifying your identity;
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (d) managing your relationship with us;
 - (e) processing payment or credit transactions;

- (f) to evaluate and manage your online application
 - (g) to gather information for market research purposes which includes sending promotional communications, targeting advertising and presenting you with relevant offers
 - (h) to facilitate your access to the Website and evaluate your website preferences
 - (i) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority; and
 - (j) any other incidental business purposes related to or in connection with the above.
6. We may disclose your personal data:
- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you.
 - (b) any other incidental business purposes related to or in connection with above

WITHDRAWING YOUR CONSENT

7. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
8. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
9. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.
10. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

11. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
12. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

13. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

PROTECTION OF PERSONAL DATA

14. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, data anonymisation, up-to-date antivirus protection, regular patching of operating system and other software, securely erase storage media in devices before disposal, web security measures against risks, and security review and testing performed regularly.
15. We cannot be held liable for any loss you may suffer for unauthorised access or loss of any data provided to the website
16. 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.

ACCURACY OF PERSONAL DATA

17. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

18. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
19. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF SINGAPORE

20. For the purposes of providing the above goods and services to you, we may share your Personal Data with the following entities:
 - 20.1 Our parent company, subsidiaries, related and associated companies
 - 20.2 Third-party service providers (such as subcontractors, agents, or network operators) who are employed to perform business and administrative functions
 - 20.3 Third-party businesses with whom we collaborate
 - 20.4 Relevant Government bodies as permitted or required by law

21. As some third parties may be located outside of Singapore, your Personal Data may be transferred out of Singapore from time to time. Such transfers will be carried out in accordance with the relevant data protection laws. Third parties, with the exception of Government bodies, are subject to confidentiality obligations and may only use your Personal Data to perform the necessary functions and not for other purposes.

COOKIES

22. A cookie is a small piece of information sent to your Internet browsing software by the website that you visit. It helps the website to remember information about your visit to render your next visit easier and the site more useful to you.
23. We may use cookies on the Website for the following purposes:
- 23.1 To improve the contents of the website
 - 23.2 To identify problems arising at web servers and resolving them
 - 23.3 To customise the content of the website and our email newsletter to suit individual interests or purposes or following market trends
 - 23.4 To utilise your browsing history on the website demographic research
 - 23.5 To obtain informative website visitation statistics which are anonymous in nature
24. You may reject our use of cookies by configuring your browser to disable the use of cookies. However, you may no longer be able to receive personalised features of the website, which rely on the use of cookies.

DATA PROTECTION OFFICER

25. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Name of DPO : Nur Zahfirah
Contact No. : 66438617
Email Address : dpo@invivos.com.sg

EFFECT OF NOTICE AND CHANGES TO NOTICE

26. This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
27. We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 01/10/2024
Last updated : 18/09/2024