

DWSPL Personal Data Protection Policy

Digital Wallet Singapore Pte. Ltd. (DWSPL) takes its responsibilities under Singapore's Personal Data Protection Act of 2012 (the "PDPA") seriously. It also recognizes the importance of the personal data you have entrusted to us and believe that it is DWSPL's responsibility to properly manage, protect, and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you have any queries on DWSPL policy or queries in relation to how we manage, protect and/or process your personal data, please contact our Data Protection Officer at:

Digital Wallet Singapore Pte. Ltd.
79 Anson Road, Unit 23-18, Singapore 079906
Tel: +65-(0) 6429-1063
Email: remitsupport.sg@digitalwallet.global

1 INTRODUCTION TO THE PDPA

1.1 "Personal Data" is defined under the PDPA to mean 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 organisation has or is likely to have access. Common examples of personal data could include names, identification numbers, contact information, medical records, photographs and video images.

1.2 We will collect your personal data in accordance with the PDPA. We will notify you of the purposes for which your personal data may be collected, used, disclosed and/or processed, as well as obtain your consent for the collection, use, disclosure and/or processing of your personal data for the intended purposes, unless an exception under the law permits us to collect and process your personal data without your consent.

2 COLLECTION OF YOUR PERSONAL DATA

2.1 The provision of your personal data is voluntary. But, if you do not provide your Personal Data to us, DWSPL may not be able to provide the services which you require of us.

2.2. DWSPL collects personal data during the course of its everyday activities and will only collect such personal data if it is necessary for one of our functions or activities.

2.3 The Personal Data Protection Act requires us to collect personal data about you, only from you, if it is reasonable and practical to do so. Some examples of the types of information which we may collect about our stakeholders include:

- contact information such as names, addresses, telephone numbers, nationality, income range, and email addresses;
- unique information such as ID or passport number, photograph, and date of birth;
- transaction history; and any information required by MAS Notice 3001 (MAS Regulation in Prevention of money laundering and financing of terrorism).

If you are a candidate for employment, we may collect your resume, other information as set in our application or during our recruitment process. This data may include information relating to your employment history, working eligibility rights, and your referee details.

3 HOW PERSONAL DATA IS COLLECTED

3.1 Some examples of how personal data can be collected:

- Register your personal details via Smiles Mobile Remittance app;
- When you communicate with us directly via our customer service officers (email, telephone, direct mail or any other means);
- When you remit funds via Smiles Mobile Remittance app.;

- When you conduct certain types of transactions such as refunds;
- When you enter, and when you interact with us during promotions, competitions, contests, lucky draws, special events, or by using devices within our office;
- Participate in surveys and other types of research; or
- If you are a candidate for employment, when you complete forms in relation to the recruitment and selection process for the purpose of assessment. We may also collect information about you from your nominated referees where you have authorised us to do so.

4 PURPOSE FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

4.1 The personal data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your personal data, including:

- to communicate with you;
- to maintain and improve customer relationship;
- to assess, process and provide products, services and/or facilities to you;
- to administer and process any payments related to products, services and/or facilities requested by you;
- to establish your identity and background;
- to respond to your enquiries or complaints and resolve any issues and disputes which may arise in connection with any dealings with us;
- to provide you with information and/or updates on our products, services, upcoming promotions offered by us and/or events organised by us and selected third parties which may be of interest to you from time to time;
- for direct marketing purposes via SMS, phone call, email, fax, mail, social media and/or any other appropriate communication channels in accordance with their consent;

- to facilitate your participation in, and our administration of, any events including contests, promotions or campaigns;
- to award points in a loyalty or rewards programme;
- to maintain and update internal record keeping;
- for internal administrative purposes;
- to send you seasonal greetings messages from time to time;
- to send you invitation to join our events and promotions and product launch events;
- to monitor, review and improve our events and promotions, products and/or services;
- to administer and give effect to your commercial transactions with us (such as tender award, contract for service, tenancy agreement);
- to process any payments related to your commercial transactions with us;
- to process and analyse your Personal Data either individually or collectively with other individuals;
- to conduct market research or surveys, internal marketing analysis, customer profiling activities, analysis of customer patterns and choices, planning and statistical and trend analysis in relation to our products and/or services;
- to share any of your Personal Data with the auditor for our internal audit and reporting purposes;
- to share any of your Personal Data pursuant to any agreement or document which you have duly entered with us for purposes of seeking legal and/or financial advice and/or for purposes of commencing legal action;
- to share any of your Personal Data with our business partners to jointly develop products and/or services or launch marketing campaigns;
- to share any of your Personal Data with financial institutions necessary for the purpose of applying and obtaining credit facility(ies), if necessary;
- for audit, risk management and security purposes;
- for detecting, investigating and preventing fraudulent, prohibited or illegal activities;
- for enabling us to perform our obligations and enforce our rights under any agreements or documents that we are a party to;

- to transfer or assign our rights, interests and obligations under any agreements entered into with us;
- for meeting any applicable legal or regulatory requirements and making disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular or code applicable to us;
- to enforce or defend our rights and your rights under, and to comply with, our obligations under the applicable laws, legislation and regulations; and/or
- for other purposes required to operate, maintain and better manage our business and your relationship with us; which we notify you of at the time of obtaining your consent
(collectively, the “Purposes”)

As the purposes for which we may/will collect, use, disclose or process your personal data depend on the circumstances at hand, such purpose may not appear above. However, we will notify you of such other purposes at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by the PDPA or by law.

4.2 In order to conduct our business operations more smoothly, we may also be disclosing the personal data you have provided to us to our third-party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether sited in Singapore or outside of Singapore, for one or more of the above-stated Purposes. Such third-party service providers, agents and/or affiliates or related corporations and/or other third parties would be processing your personal data either on our behalf or otherwise, for one or more of the above-stated Purposes.

5 SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

5.1 We respect the confidentiality of the personal data you have provided to us. DWSPL does not share, sell, rent or release any personal data collected to any individuals, companies or groups. Any information we collect is used for DWSPL’s own purposes as described in this PDPA policy.

5.2 So that we can provide a wide range of products and services to you, third party service providers offering services are engaged through DWSPL, including the following:

- Data entry service providers
- Professional advisors, consultants and/or external auditors
- Storage facility providers
- Third party service providers who provide operational services such as telecommunications, information technology, printing, postal service, marketing promotions, and relevant government regulators to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority.

5.3 The third parties whom we conduct business are only authorized to use your information to perform the service for which they were hired. As part of our agreement with them, they are required to follow the PDPA laws and policies that we provide, and to take reasonable measures to ensure your personal data is secure.

5.4 In that regard, we will not disclose your personal data to third parties without first obtaining your consent permitting us to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;
- cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- cases in which the disclosure is necessary for any investigation or proceedings;
- cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;

- cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest; and/or
- where such disclosure without your consent is permitted by the PDPA or by law.

5.5 The instances listed above at paragraph [6.4] are not intended to be exhaustive. For more information on the exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the PDPA.

5.6 Where we disclose your personal data to third parties with your consent, we will employ our best efforts to require such third parties to protect your personal data.

6 REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

6.1 You may request to access and/or correct the personal data currently in our possession by submitting your request via email. DWSPL may access their personal data by viewing and editing customer information in its database.

6.2 For a request to access personal data, we will provide you with the relevant personal data within three (3) days from such a request being made.

6.3 Where a request cannot be complied with within the above time frame, we will inform you of the reasonably soonest time in which we will respond.

6.4 For a request to correct personal data, we will:

- (a) correct your personal data as soon as practicable after the request has been made unless we have reasonable grounds not to do so; and
- (b) subject to paragraph [6.5], we will send the corrected personal data to every other organisation to which the personal data was disclosed by DWSPL within a year before the date the correction was made, unless that other organisation does not need the corrected personal data for any legal or business purpose.

6.5 Notwithstanding paragraph [6.4(b)], we may, if you so consent, send the corrected personal data only to specific organisations to which the personal data was disclosed by us within a year before the date the correction was made.

6.6 Depending on the scope and nature of the work required to process your access request, we may be required to impose a fee to recover our administrative costs. This will be assessed on a case-by-case basis by our Data Protection Officer. Where such a fee is to be imposed, we will provide you with a written estimate of the fee for your consideration. Please note that we will only process your request once you have agreed to the payment of the fee. In certain cases, we may also require a deposit from you before we process the access request. You will be notified if a deposit is required in the written estimate of the fee, if any.

7 REQUEST TO WITHDRAW CONSENT

7.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by submitting your request in writing to one of our customer service officers.

7.2 We will process your request [within a reasonable time] from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your personal data in the manner stated in your request.

7.3 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

7.4 The collection of your Personal Data by us may be mandatory or voluntary in nature depending on the Purposes for which your Personal Data is collected. Where it is obligatory for you to provide us with your Personal Data, and you fail or choose not to provide us with such data, or do not consent to the above or this Policy, we will not be able to provide products and/or services or otherwise deal with you.

8 ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

8.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, if your personal data is likely to be used by DWSPL to make a decision that

affects you or disclosed to another organisation. However, this means that you must also update us of any changes in your personal data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete personal data arising from your not updating us of any changes in your personal data that you had initially provided us with.

8.2 We will also put in place reasonable security arrangements to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot assume responsibility for any unauthorized use of your personal data by third parties which are wholly attributable to factors beyond our control.

8.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.

9 COMPLAINT PROCESS

9.1 If you have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance through email at

- Tel: +65-(0) 6429-1063
- Email: remitsupport.sg@digitalwallet.global

9.2 You may also contact us through one of the following methods with your complaint or grievance:

- Visit: Digital Wallet Singapore Pte. Ltd
79 Anson Road, Unit 23-18, Singapore 079906
- Tel: +65-(0) 6429-1063
- Email: remitsupport.sg@digitalwallet.global

9.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as “PDPA Complaint.”

9.4 We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

10 UPDATES ON DATA PROTECTION POLICY

10.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes from time to time.

10.2 We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy will be posted on our Smiles Mobile App.

10.3 You are encouraged to view the Smiles Mobile App from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

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