



Personal Data Protection Policy

1. INTRODUCTION

We at Sentosa Golf Club (“**SGC**”) are committed to protecting information under our control that identifies you (“personal data”), including but not limited to your name, identification numbers, contact information, photographs and video images. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data. This Personal Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data. If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “DPO”) at dataprotectionofficer@sentosa.com.sg.

2. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND PROCESSING OF PERSONAL DATA

2.1 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:

(a) evaluating and/or processing your Sentosa Golf Club membership application whereby you will be given access to possible rewards, discounts, privileges, promotions, offers, services and/or products, offered by SGC, SGC’s related corporations or associated companies, as well as partners, merchants and/or third party organisations with whom SGC may collaborate, partner or tie up with (collectively the “Member Benefits”)(SGC’s related corporations or associated companies, as well as partners, merchants and/or third party organisations with whom SGC may collaborate, partner or tie up shall be referred to as “SGC Partners”);

(b) administering, dealing with, managing and/or maintaining your Sentosa Golf Club membership with SGC including but not limited to administering and dealing with your Member Benefits, sharing your personal data with SGC Partners to administer and deal with Member Benefits, contacting you through various modes of communication such as via phone/voice call, text message and/or fax message, email and/or postal mail for such purposes, dealing in any matters relating to your membership (including the mailing of correspondence, statements, information, invoices, or notices to you, which could involve disclosure of certain personal data about you to bring about delivery of the same), performing internal administrative, operational and technology tasks for the said purposes, storage and/or backup of your personal data;



(c) providing and sending you marketing, advertising and/or promotional information and materials relating to Member Benefits as well as products, attractions, events and/or services that SGC or SGC Partners may be selling, marketing, offering and/or promoting, on Sentosa island, via various modes of communication such as (i) postal mail to your postal address(es) and/or electronic transmission to your email address(es) (based on our records that we have of your postal address(es) and email address(es) or any new or amended postal or email address(es) that you may provide us with from time to time) and (ii) via telephone/voice calls, SMS/MMS and/or facsimile to your telephone number(s) (based on our records that we have of your telephone number(s) or any new telephone number(s) that you may provide us with from time to time);

(d) dealing with or facilitating customer service, carrying out your instructions, or dealing with or responding to any enquiries, compliments, or complaints given by you or on your behalf;

(e) evaluating, processing, and/or administering your request or application for events programmes, or contests organised by SGC or SGC Partners, handling any matters relating to your participation in the particular events, programmes, or contests;

(f) receiving your information through content you have submitted via the social media pages managed and owned by SGC on various platforms (e.g. Facebook, Instagram, Twitter, YouTube, LinkedIn, TikTok, Telegram, Weibo, WeChat). Content submitted could be a photo you shared with us (e.g. hashtagging or tagging us in your captions) on any of the social media platforms through participation in our promotional activities;

(g) facilitating your access to and/or use of our provided services (e.g. bookings) on our online interfaces (e.g. www.sentosagolf.com) and/or physical counters;

(h) complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on SGC or on SGC's related corporations (such as the Sentosa Development Corporation) or associated companies and for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which SGC or SGC's related corporations or associated companies is/are expected to comply;

(i) evaluating, processing, and/or administering your application to an internship or job opening;

(j) conducting research, analysis and development activities (including but not limited to data analytics, surveys, product and service development and/or profiling) to improve SGC's services or products and/or to enhance your membership



experience, via various modes of communication such as (i) postal mail to your postal address(es) and/or electronic transmission to your email address(es) (based on our records that we have of your postal address(es) and email address(es) or any new or amended postal or email address(es) that you may provide us with from time to time) and (ii) via telephone/voice calls, SMS/MMS and/or facsimile to your telephone number(s) (based on our records that we have of your telephone number(s) or any new telephone number(s) that you may provide us with from time to time); and

(k) any other purposes 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 purpose at the time of obtaining your consent, unless processing of your personal data without your consent is permitted by law.

2.2 In order to conduct our 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.

2.3 Unless you have provided your consent for SGC and/or SGC Partners to contact you for the purpose of providing and sending you marketing, advertising and/or promotional information and materials via various modes of communication such as (i) postal mail to your postal address(es) and/or electronic transmission to your email address(es) (based on our records that we have of your postal address(es) and email address(es) or any new or amended postal or email address(es) that you may provide us with from time to time) and (ii) via telephone/voice calls, SMS/MMS and/or facsimile to your telephone number(s) (based on our records that we have of your telephone number(s) or any new telephone number(s) that you may provide us with from time to time), we will not send you any marketing messages.

3. SPECIFIC ISSUES FOR THE DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

3.1 We respect the confidentiality of the personal data you have provided to us.

3.2 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:



- (a) cases in which the disclosure is required or authorized based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;
- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which the disclosure is necessary for any investigation or proceedings;
- (e) 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; and/or
- (f) where such disclosure without your consent is lawful.

3.3 Where we disclose your personal data to third parties, we will employ our best efforts to ensure all appropriate contractual arrangements and security mechanisms are in place to protect your personal data.

4. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request to access and/or correct the personal data currently in our possession or control by submitting a written request to us at dataprotectionofficer@sentosa.com.sg. We will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request.

4.2 For a request to access personal data, once we have sufficient information from you to deal with the request, we will seek to provide you with the relevant personal data within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested.

4.3 For a request to correct personal data, once we have sufficient information from you to deal with the request, we will:

- (a) correct your personal data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction; and
- (b) send the corrected personal data to every other organisation to which the personal data was disclosed by SGC 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.

4.5 We may also be charging you a reasonable fee for the handling and processing of your requests to access your personal data. We will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

5. REQUEST TO WITHDRAW CONSENT

5.1 You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control by writing in to us at dataprotectionofficer@sentosa.com.sg.

5.2 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.

5.3 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 or certain services may no longer be possible.

6. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

6.1 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 SGC 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 you not updating us of any changes in your personal data that you had initially provided us with.

6.2 We will also put in place reasonable security arrangements (including policies, processes, and safeguards) to ensure that your personal data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorised access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. This includes, but not limited to, systematic training for SGC personnel handling personal data, storing data in an encrypted manner where applicable, restricting access to personal data to authorised personnel only, and robust monitoring and oversight to ensure proper personal data management. However, we cannot assume responsibility for any unauthorised use of your personal data by third parties which are wholly attributable to factors beyond our control.



6.3 We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymised as soon as it is reasonable to assume that:

(a) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and

(b) retention is no longer necessary for any other legal or business purposes.

6.4 Where your personal data is to be transferred out of Singapore, we will take appropriate steps to ascertain that the foreign recipient organisation of the personal data is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is at least comparable to the data protection standards that SGC is subject to. This may include us entering into an appropriate contract with the foreign recipient organisation dealing with the personal data transfer or permitting the personal data transfer without such a contract if it is lawful for us to do so.

7. COOKIES AND OTHER TECHNOLOGIES

7.1 When you visit any of our websites (e.g. www.sentosagolf.com), we will automatically collect your IP address and store cookies on your browser in order to operate and facilitate your access to our websites as well as to ensure system stability and efficiency and to implement proper safeguards as to the security of our websites and services. The personal data collected as a result is necessary to operate and facilitate your access to our websites, or to fulfil our legitimate interest with regards to our use of technical information to enhancing our systems, making your usage of the websites more convenient or ensuring the security of our websites. This is based on our legitimate interest as the data used for these purposes are stored for a limited period only and we are generally not able to personally identify the user without larger efforts. We will not store cookies longer than is necessary for the abovementioned purposes, unless the user clears their cookies.

7.2 Cookies are small data files sent to your browser to store and track information about you when you enter our digital services. The cookies do not harm your device and do not contain any viruses. The cookies are used to track information such as the number of users and their frequency of use, profiles of users and their preferred digital services. This data does not contain information that we could allocate to a natural person. The information can later be read by us to facilitate your access to our website, gather statistical data, and personalize your online experience. We may use cookies on our website for purposes including, but not limited to, improving your user experience on our website, remembering your preferences and may be used to target advertising that might be of interest to you, helping us understand how our website is performing, to monitor traffic to the website, detecting your web browser's multimedia capabilities, tracking promotional advertisements that we have displayed



to you and maintaining current login and purchase information on secure portions of the website (the “Cookie Purposes”).

7.3 Most browsers automatically accept cookies, but you can modify your browser setting to decline cookies. Generally, you can remove these cookies by following directions provided in your Internet browser’s “help” file. If you choose not to allow us to place a cookie on your computer, you may be restricted from some services and some of the interactive features offered on our websites may be similarly restricted or rendered inoperable.

7.4 Personal data (if any) that we collect from you through cookies may be passed to our third party service providers, whether located in Singapore or elsewhere, for one or more of the Cookie Purposes, for managing and/or administering our website, or for the purpose of data hosting/storage/backup.

7.5 The information we obtain in this manner enables us to customize the services we offer and measure the overall effectiveness of our online content, advertising campaigns, and the products and services we offer through our website. By accessing and using our website, you agree that we can use cookies on your device.

7.6 Our website may allow third parties to download cookies to your device. Third parties, such as analytics firms and business partners, may use cookies and other technologies to collect non-personal data about your online activities while you are on our website. This information may be used to measure usage of our website and personalize advertising content on our website. We do not have access to or control over cookies or other features these third parties may use, and the information practices of these third parties are not covered by this Privacy Policy. Please refer to the privacy policies of those third parties to better understand their activities and practices.

8. COMPLAINT PROCESS

8.1 If you have any complaint or grievance regarding about how we are handling your personal data, we welcome you to contact us with your complaint or grievance.

8.2 Please contact us through one of the following methods with your complaint or grievance:

(a) E-mailing the DPO at dataprotectionofficer@sentosa.com.sg (Attention to the ‘Data Protection Officer’)

(b) Writing and mailing to us at 39 Artillery Avenue Sentosa Singapore 099958 (Attention to the ‘Data Protection Officer’)



8.3 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 Personal Data Protection 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 “Personal Data Protection Compliant”.

9. EU GDPR

9.1 This section of the Data Protection Policy applies only if you are located in the EU and supplements the information in this Personal Data Protection Policy.

9.2 We are the controller of personal data only when we collect it and determine the purposes and means of processing that personal data.

9.3 Our business may require us to transfer your personal data to countries outside of the EU, including to countries that may not provide the same level of data protection as your home country. We take appropriate steps to ensure that recipients of your personal data are bound to duties of confidentiality and we implement measures such as standard contractual clauses.

9.4 European Union Data Subject Rights

Where you are a resident in the EU, you may have certain rights under the GDPR in relation to the personal data we hold about you, which we detail below. Some of these rights only apply in certain circumstances as set out in more detail below:

(a) Request access to your personal information (also known as “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

(b) Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

(c) Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us to continue processing it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.

(d) Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.



(e) Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

(f) Request the transfer of your personal information to another party.

9.5 If you wish to exercise any of the rights above, please contact us at:

(a) Emailing the DPO at dataprotectionofficer@sentosa.com.sg (Attention to the 'Data Protection Officer')

(b) Logging into your account in our applications and/or website where applicable, or

(c) Writing and mailing to us at 39 Artillery Avenue Sentosa Singapore 099958 (Attention to the 'Data Protection Officer')

10. GENERAL INFORMATION

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 Personal Data Protection Policy. Any amended Data Protection Policy will be posted on our website and can be viewed at www.sentosagolf.com.

10.3 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

10.4 This Policy is to be read together with our Sentosa Golf Club Rules and applies to all products and services provided by SGC.

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