

Privacy Policy

GENERAL

1. We are committed to safeguarding your privacy. We treat all personal data provided by you in strict confidence, and will only use your personal data in the manner set out in this privacy policy. This privacy policy applies to all personal data that you provide to us and the personal data we hold about you. This policy describes how we may collect, use, disclose, process and manage your personal data. **Please DO NOT provide any personal data to us if you do not accept this policy.**

WHAT PERSONAL DATA IS COLLECTED

2. The personal data we collect includes:-

Data collected directly from you. This may be done through our Website at www.htlinternational.com, over the phone, by email, through documents such as our order forms or contact forms, or in person when you meet our staff or representatives. The data collected may include, but is not limited to:

- your contact information, including your (first and last) name, (billing or delivery) address, birthdate and email address and, optionally, your telephone number.
- other information required to be able to process orders that you place or purchases that you may make, such as information concerning the products you have ordered, the billing and delivery address, banking and/or credit card details.
- the preferences and interests stored in or associated with your account.
- if you have contacted us, the details of this contact and the contact history.

Data collected by automated means. Various technologies may be used on our Website in order to make it more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. These technologies include but are not limited to cookies, web beacons, tracing links, click stream data and web analytics. You may set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However if you do block cookies, you may not be able to use certain features and functions of our web sites.

HOW IS THE COLLECTED PERSONAL DATA USED

3. We use your personal data for the purposes of serving you. This includes:-
 - providing you with the services and products that you have requested e.g. notify you of the details of your furniture purchase and delivery status.
 - providing you with a convenient shopping experience.

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- contacting you for feedback after a sale of a product or service.
 - contacting you if we have questions or information for you regarding your order or to notify you regarding the status of your order or delivery.
4. We may also use your personal data for purposes connected or relevant to our business, such as:-
- complying with our legal obligations and requirements.
 - enforcing obligations owed to us.
 - research into the development of new products and services or improvement of our existing products and services.
 - accounting, risk management and record keeping.
 - carrying out research, planning, data and statistical analysis.
 - staff training.
5. If you have consented, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates (including other companies and business under the HTL Group) e.g. informing you of our latest activities, special offers and promotions. In order for us to market products and services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us). ***If you do not wish to receive such marketing material from us, please contact (see below) us to be removed from our mailing list. Alternatively, you may use the “Unsubscribe” feature which accompanies that is found in the electronic communications sent to you.***
6. If you have contacted us with any complaints, feedback, comments or suggestions, we may use and disclose your personal data (including your contact history) to respond to you.
7. When using your personal data to contact you for the above purposes, we may contact you via regular mail, fax, e-mail, SMS, telephone or any other means.

DISCLOSURE OF INFORMATION

8. We will not sell your data to third parties.
9. In order to operate and/or provide you with our products or services and to carry out the purposes set out in this privacy policy or as otherwise informed, we may disclose or share your personal data with any personnel of HTL Group (who may be in Singapore or elsewhere) or to third parties who provide necessary services to us or goods and services to you, such as:-
- service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing etc.
 - our consultants and professional advisers (such as accountants, lawyers, auditors)
10. In disclosing your personal data to us, you agree that we may transfer your personal data outside Singapore. Please be assured that when we disclose your personal data to persons within the HTL Group or to third parties, we require them to ensure that any personal data

disclosed to them are kept confidential and secure and will comply with the Personal Data Protection Act of Singapore and other applicable data protection and privacy laws in respect of the collection, use, disclosure, accuracy, access and correctness, protection, retention and transfer of your personal data. We do not provide your personal data to third parties outside the HTL Group for their marketing purposes without your consent. We do not sell your personal data to any third parties. We will also disclose your personal data to third parties in order to comply with legal obligations or industry requirements. This includes disclosures to legal, regulatory, governmental, tax and law enforcement authorities.

- 11. If you have contacted us with any complaints, feedback, comments and/or suggestions, we may use and disclose your personal data (including your contact history) to respond to or to facilitate a response to you. If you make a complaint and you do not want us to disclose your identity to the party you are complaining about, you must let us know immediately. However, it may not always be possible to handle your complaint on an anonymous basis.

- 12. In compliance with Section 25 of the Singapore Personal Data Protection Act 2012 (PDPA), we retain personal data only for as long as necessary to fulfil the purposes for which it was collected, and for the following specific retention periods:
 - Customer transaction & order data: retained for 7 years from the date of completion of the transaction or order, for accounting, tax, legal, and dispute resolution purposes.
 - Contact & inquiry data: retained for 1 year from the date of your last inquiry or interaction with us.
 - Marketing data: retained until you withdraw consent or unsubscribe, and for a further 1 year thereafter for record purposes.
 - Complaint & feedback data: retained for 2 years from the date of closure of the complaint or feedback case.
 - Automatically collected data (cookies, log data): retained for 1 year from collection.
 - Employee personal data: retained for the duration of employment for human resource administration, payroll processing, and compliance purposes, and for a reasonable period thereafter (typically up to 5 to 7 years after cessation of employment) in accordance with legal, regulatory, and business requirements.

Once the relevant retention period expires, or when retention is no longer necessary, we will securely delete, destroy, or anonymise your personal data in accordance with PDPA requirements.

SECURITY

- 13. All personal information gathered is stored in our secure servers and/or under lock and key. All precautions will be taken to ensure that the personal information you provide is protected against unauthorised or unintended access. However, we cannot be held responsible for unauthorised or unintended access that is beyond our control.

LINKS TO OTHER WEBSITES

- 14. Our Website may contain links to other websites which are not owned or maintained by us. These links are provided only for your convenience. This privacy policy only applies to our website. When visiting these third party websites, you should read their privacy policies.

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AMENDMENT OF PRIVACY POLICY

15. We may amend this privacy policy from time to time. The updated privacy policy will be made available at www.htlinternational.com.

YOUR RIGHTS

16. If you do not accept the amended privacy policy or if you wish to withdraw any consent you have given us at any time, or if you wish to update your personal data, you may contact us at.

HTL MARKETING Pte Ltd

Attention to : Data Protection Officer (DPO)
Email : dataprotection@htlinternational.com
Address : 12 Tai Seng Link #03-01A GRC Centre Singapore 543233

17. In many circumstances, we need to use your personal data in order for us to provide you with products or services which you require. If you do not provide us with the required personal data, or if you withdraw your consent to our use and/or disclosure of your personal data for these purposes, it may not be possible for us to continue to serve you or provide you with the products and services that you require.

GOVERNING LAW

18. This privacy policy is governed by the laws of Singapore. You consent to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this privacy policy.