

SPOTV MEDIA PTE. LTD.

Effective Date: July 1, 2023

PRIVACY POLICY

** Unless otherwise defined in the context of this Privacy Policy, all terms herein with the initial letter capitalised shall have the meanings ascribed to them in the Terms and Conditions of Use.

We maintain and offer, or may maintain and offer in the future, the Applications and Services, and this Privacy Policy (as updated or amended from time to time) sets out how We collect, use, manage and protect the personal data or information (“**Data**”) that We may collect from or about You through or in connection with Our Applications and Services. It applies to all individuals whose Data may be handled by the Company, whether as controller or processor, and shall apply whenever You use or access any of Our Applications and/or Services, including Our online sports channels, regardless of the platform or device used. Your privacy is very important to Us, and We are committed to processing Your Data in accordance with the required standards and protecting Your Data. This includes protecting Your privacy and ensuring the security of Your Data in compliance with all applicable privacy protection related laws, regulations, statutes and ordinances (“**Ordinance**”).

By accessing Our services, You agree to be bound by the terms of this Privacy Policy and that You also agree that Your Data may be collected, processed, used and transferred to any person or entity We consider appropriate, within or outside the Territory as set out in this Privacy Policy. Before using and providing Your Data for the purposes as set out in this Privacy Policy, We may be required by Ordinance to obtain Your written consent, and in such cases, only after having obtained such written consent, may We use Your Data in the manner as specified.

If We decide to change Our Privacy Policy, We will post those changes to this Privacy Policy and other places We deem appropriate so that You are aware of what information We collect, how We use it, and under what circumstances, if any, We disclose it. We reserve the right to modify this Privacy Policy at any time, so please review it frequently. If We make material changes to this Privacy Policy, We will notify You here or by means of a notice on Our Applications.

1. SCOPE OF DATA

For the purposes of carrying on Our Services (including the verification of Your identity to detect, prevent and address fraud, security or technical issues, the registration, activation and management of Your account with Us, and the billing and charging of Our Services, if any) and complying with Ordinances and/or requests issued by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies, You may be requested to provide Data such as, but not limited to:

- (i) the name, date of birth and other details documented on Your identity card or other legal identity cards, travel document, student card and/or driver’s license;
- (ii) contact details, including name, address, phone number, mobile telephone number and/or email address;
- (iii) Data that You have shared with third party social media platform operators (e.g., account login name, profile picture, contact details, etc.) when You access or login to Our Services through a third party social media service or connect one of Our Services to a third party social media platform;
- (iv) payment details, including credit card, debit card and other electronic banking Data;
- (v) account details or Data relating to Services registered with Us, including the relevant PIN, username or password, account numbers and/or service numbers;
- (vi) device specific information such as hardware model, operating system, version, unique device identifier, serial numbers, setting configurations and software and mobile network configuration;
- (vii) information about how You use Our Services, such as Your network usage, how You use Our network, and Your location when You are using Our Services;
- (viii) information that allows Us to identify You for verification purposes, including biometric information like Your fingerprints and voice pattern;
- (ix) Your credit and service history to enable Us to assess Your eligibility for Our offers of Services or to accommodate Your request for transfer of Services or Your account with Us;

- (x) all Data requested by applicable government authorities, courts, law enforcement or other authorities or regulatory bodies to enable Us to comply with or in connection with any law, rule, regulation, judgment or court order (whether within or outside of the Territory); and
- (xi) any other Data as may be required by the Company and/or their respective contractors, sub-contractors, intermediaries, agents, business partners or representatives, brokers, or underwriters from time to time and which is necessary for the provision of the Services.

In some instances, where required by law to do so or so that We may further improve Our Services and/or better tailor the type of information or content that We present to You, We may seek Your consent to process the following types of special Data: (i) age; (ii) gender and ethnicity; (iii) marital status; (iv) salary range and employment details; (v) education and profession; (vi) hobbies and leisure activities; (vii) the Services that You have subscribed for; and (viii) family and household demographics. Where the requested Service is a personalised Service or provision of a product is dependent upon Your provision of all requested special Data, failure to provide the requested special Data may prevent Us from providing those Services to You.

To better serve Your needs and preferences, Our Web servers may collect Data relating to Your Website, device or app activity. We may also collect aggregated, anonymous, statistical data on the server's usage so that We may better cater to the behaviour of users of Our Websites and mobile and TV apps. This type of Data may include, but is not limited to:

- (i) browser type, version and user agent;
- (ii) operating system;
- (iii) IP (Internet Protocol) address and/or domain name;
- (iv) connection data, statistics on page views and/or referral URLs;
- (v) device ID, location and phone contacts;
- (vi) videos watched or searched for;
- (vii) songs listened to or searched for;
- (viii) links or images clicked on;
- (ix) cookies and/or browser, app or Web server log data; and
- (x) device and software characteristics and/or configuration.

Some of Our Applications may use cookies or similar tracking tools on Your machine or Device in order for Us to, for example, personalise Your user experience and/or maintain Your identity across multiple Webpages and/or Internet sessions. This Data may include but is not limited to relevant login and authentication details as well as Data relating to Your activities and the preference configurations on Your Device and across Our Websites and mobile and TV apps.

2. PURPOSE OF DATA COLLECTION

We may collect, retain and use Your Data for the following purposes:

- (i) to verify Your identity;
- (ii) to process Your application to subscribe to Our Services and other programs operated by Us;
- (iii) to verify Your eligibility for Our offers of Services, promotions or other events;
- (iv) to provide, activate and/or renew Services and programs operated by Us;
- (v) to provide You with rewards, promotional benefits, updates, offers and invitations to events;
- (vi) to promote and market Our Services to You;
- (vii) to conduct credit checks and detect fraudulent activities in compliance with the applicable anti-money laundering and counter-terrorist financing Ordinances and in relation to other compliance purposes;
- (viii) to perform research or analyses so that We may improve and optimise the Services and/or programs that can be made available to You;
- (ix) to conduct surveys and marketing, promotional, and behavioural scoring for business operations and/or planning purposes;
- (x) to carry out market and product analyses in order to generate statistical or actuarial reports (containing aggregated data that does not relate to any identified or identifiable individual);
- (xi) to enforce Our contractual rights;
- (xii) to process any payment instructions and/or credit facilities, if any, in relation to Our supply of Services to You;
- (xiii) to maintain and develop Our business Systems and infrastructure, including testing and upgrading these

- Systems;
- (xiv) to maintain, enhance and develop Our products and Service offerings;
 - (xv) to process claims involving You (including but not limited to making, defending, analysing, investigating, processing, assessing, determining, responding to, resolving or settling such claims);
 - (xvi) to comply with Our telecommunications license obligations in respect of interconnection arrangements with other telecommunications operators and related industry practices;
 - (xvii) to comply with applicable laws in or outside the Territory as may be required by applicable government authorities, courts, law enforcement, or regulatory or investigation bodies, in relation to the Services provided to You, including to assist in the prevention, detection of crime or possible criminal activities; and
 - (xviii) to distribute Our publications and research materials as well as those of Our business partners and counterparties.

3. COLLECTION OF DATA

We collect Data in a number of ways, including from You directly, for example, when You provide Data via email, complete an application form or agreement for one of Our Services, or when You submit Your Data through Our Websites, Applications, or over any customer service hotlines or online sessions; or when You contact Us with a query or request; or during the ordinary course of the continuation of Our business relationship with You; or when We are legally required to do so; third parties such as related entities, business partners, or other customers, or Your representatives with appropriate consent from You; publicly available sources; Our own records of how You use Our Services; Your visits on Our Websites, Applications; and/or Your participation in surveys or marketing promotions organised by Us or on Our behalf. The personal information collected by the Company shall be the minimum necessary for providing services. If additional information is needed, it may be requested.

Information collected from You upon signing up for our Service are: (i) password (to be encrypted), name, date of birth, phone number (this number will be subject to authentication), gender, and Your preferred sports event if you sign up via email accounts; and (ii) connecting information (CI), name, date of birth, phone number (this number will be subject to authentication), gender, and Your preferred sports event if you sign up via Facebook, Apple and Google. We may also collect information concerning live chat, including but not limited to nicknames and any information You posted during the Service use process or business processing. Additional information may be collected for the purpose of providing customer advice and personalised services. This may include information regarding incoming and outgoing phone numbers, the times when You have communicated with Us by phone, the record of Your use of our service and the times when You have logged into Our Service, cookies, IP assessment information, payment information, device information and suspension records.

4. MAINTENANCE AND USE OF DATA

The Company will hold data supplied by You and will be accessible by employees of the Company and authorised third parties (consistent with the situations or for the purposes set out in this Privacy Policy) or as otherwise indicated by prior notice to You or, where required, by obtaining Your consent. The primary purpose of the collection of Data is to maintain Our database of customers, viewers of Our channels and customers of Our Services so that We may effectively communicate with and provide Our Services to You. We will use Your Data as set out herein when We are providing Services to You directly or when You are viewing Our channels on a platform delivered by a third party.

All required efforts are made to ensure that any Data held by Us is stored in a secure and safe place and is accessible only by Our authorised employees or other Organisations referred to in this Privacy Policy. When We pass Your Data to third party Organisations for them to process, We seek to ensure that they have appropriate security measures in place to keep Your Data safe and comply with applicable principles concerning data protection. Some of the people We share Your Data with may process it overseas.

We will retain Your Data in accordance with Our internal policies. Our policies are in compliance with the Ordinance and applicable laws and regulations. Data will only be retained for as long as necessary to fulfil the original or directly related purposes for which it was collected unless the Data is also retained to satisfy any applicable legal, regulatory or contractual obligations. Data are purged from Our electronic, manual and other filing systems based on the above criteria and Our internal procedures.

5. DISCLOSURE OF DATA

In order to provide the Services that You have requested, We may, to the extent permissible under applicable laws and regulations, disclose Your Data to organisations or parties outside of the Company (which may be within or outside of the Territory) (collectively, “**Organisations**”). Your Data is disclosed to these Organisations for the strict purpose of enabling us to supply Our Services to You. These Organisations provide support services to Our businesses and operations including without limitation: customer enquiries; delivery, logistic and warehouse services; mailing operations; billing and debt-recovery functions; information technology services; installation, maintenance and repair services; marketing, advertising and telemarketing services; market research; customer usage and behavioural analysis; process management; after sale services; surveys; website usage analysis; and cloud storage services.

We take the required steps to ensure that these Organisations are bound by appropriate confidentiality and privacy obligations in relation to the protection of Your Data and that they use Your Data for the sole purpose of carrying out the services for which they have been engaged, and not for their own or other purposes.

In addition, We may disclose Your Data to Your authorised representatives and/or Your legal advisers when requested by You to do so for the purposes of providing administrative, business, legal and/or operational support to the following parties: credit-reporting and fraud-checking agencies, financial institutions, charge or credit card issuing companies, credit providers, credit bureau, collection agencies or security agencies, telecommunications network operators, Our affiliates, overseas offices, assignees, transferees and representatives, Our professional advisers, including Our accountants, auditors, lawyers and insurers, government and regulatory authorities and other organisations, as required or authorised by law, Organisations who manage Our business and corporate strategies, and those involved in managing Our corporate risk and funding functions (e.g., securitisation) and/or charities or non-profit Organisations.

We may disclose Your Data to the extent that We are required to do so by law, including in connection with any legal proceedings or anticipated legal proceedings, or in order to comply with any legal obligation or to establish, exercise or defend Our legal rights.

6. TRANSFER OF DATA

We may transfer or otherwise disclose Our database of Data to an actual or potential successor entity in connection with a corporate merger, consolidation, sale of Our assets or substantially all Our assets, share sale, investment transaction or other corporate rearrangements. Your Data may be transferred overseas if We sell, transfer or disclose Our database of Data to an actual or potential successor entity, purchaser or investor who is located or has offices overseas. By agreeing to this Privacy Policy, You agree that Your Data may be transferred to such successor entity, whether in the Territory or overseas.

At times it may be necessary and/or prudent for Us to transfer Your Data to places outside of the Territory, for the prevention, detection or investigation of crime or for storage, processing and other purposes for which the Data were collected. In the event that We do transfer Your Data outside of the Territory, We will do so in compliance with the prevailing requirements of the Ordinance and all other applicable privacy and data protection laws and regulations of the Territory.

You have the right to request and receive a copy of Your Data in a commonly used and machine-readable format. Upon such request, We will provide You with Your Data in a timely manner, allowing You to transfer it to another third party if desired. Please note that this option applies to Data that You have provided to Us and which We process with Your consent and/or for the performance of this Terms and Conditions & Privacy Policy.

7. LIMITATION, CORRECTION, WITHDRAWAL AND DELETION OF DATA

We take all reasonable precautions to ensure that the Data We collect, use, disclose, or transfer is accurate, complete and up-to-date. However, the accuracy of that Data depends to a large extent on the Data You provide. You have a right to request access to and correction of, Your Data, and We recommend that You let us know if there are any errors in Your Data and keep us up-to-date with changes to Your Data. If You wish to access or amend any of Your Data We hold or request that We delete (only applicable where the rights to erasure are required by law) any of Your Data that is no longer necessary for the provision of Our Services, please contact us at the details below.

You may decline to share Data with Us and/or limit or withdraw any consents which You may have provided to use Your Data, in which case, We may not be able to provide You with some of Our Services. To withdraw Your consent to Our use of the Data, please contact Us at the details below. At any time, You may object to Us holding or processing Your Data on legitimate grounds, save and except as otherwise permitted by the applicable law.

Please note that We have no control over the content of the linked websites, webpages and mobile and TV applications or the way in which the operators of those websites, webpages and mobile and TV applications deal with Your Data, and we are not responsible for the content of such third party websites, webpages or mobile and TV applications. You should review the privacy policy of such third party websites, webpages and mobile and TV applications to understand the ways in which those third parties may use Your Data.

Contact Us

To find more information about Our Service and its features or if You need assistance with Your account, please visit the SPOTV NOW [Help Center](#), which is accessible through the pc.spotvnow.com website.

Or if You have comment, questions or complaints about or requests relating to this Privacy Policy, please contact Our Data Protection Officer (“DPO”) at the below address:

SPOTV Media DPO
300 Beach Road
#30-05 The Concourse
Singapore 199555

Or email at enquiries@spotvmedia.com referencing: Privacy Policy

This Privacy Policy may be updated from time to time, and all handling of Data will be governed by the most recent version of this Privacy Policy. We recommend that You review it regularly for changes. If there is any inconsistency between the English and other language versions of this Privacy Policy, the English version shall prevail.