

# URAH Privacy Policy

URAH Transdermal Pt Ltd (URAH) take your privacy seriously and URAH will only collect and use personal data as stated in this Privacy Policy.

## 1. Collection and use of personal data

1.1 URAH will only use or disclose your personal data with your consent or as authorised by applicable laws and regulations. The personal data collected may include:

- Name
- Date of birth
- Gender
- Home address
- Delivery address
- Email address
- Telephone/ Mobile number

1.2 By creating an online account with us (whether directly or on your behalf) or purchasing any products/services via Urah Online, you consent to our collection, use and disclosure of your personal data for any or all of the purposes specified below:

- Administer, maintain, update and/or process your online account with us;
- Provide the products or services purchased from us online (and for all other matters relating to such purchase, including following up with you on product/service delivery);
- Verify and carry out financial transactions in relation to payments made for online purchases from us;
- Managing, investigating or responding to feedback, request, claims or complaints provided or made by you;
- Audit the downloading of data from our website;
- Improve or customise the layout or content of our website;
- Identify visitors to our Website; and making such disclosures as may be required for: (i) any of the above purposes; (ii) as required by law; (iii) as requested by any law enforcement or government or regulatory authority; or (iv) in respect of any queries, feedback, complaints or claims made by you, or any potential data breach or leakage.

1.3 With your consent, URAH may collect, use and disclose your personal data for any or all of the purposes specified below:

- Deliver marketing or promotional materials relating to our products, services or special offers (and other information which you have requested);
- Inform you of updates to this website;
- Provide information or services relating to our products, promotions or offers; or
- Conduct market surveys, research or data mining to provide you with a more personalised experience in respect of our website, mobile applications, products, services and/or your online membership account with us.

You agree that URAH may disclose, transfer and share (whether in Singapore or abroad) your personal data amongst the Business Units and/or our direct or indirect holding companies (including but without limitation to Affiliates") for the purposes in this Privacy Policy, including (without limitation) storing, processing and enabling access to your personal data under a single customer database used by us (across our organisation and all Business Units) and our Affiliates.

1.5 You further agree that URAH may disclose and transfer (whether in Singapore or abroad) your personal data to our Affiliates (defined above), and/or to third party services providers engaged by us or our Affiliates to provide:

- customer database management services,
- customer contact services (and service providers may contact you regarding promotions, products rewards, vouchers and redemption letters and customer service on behalf of us or our Affiliates),
- secure data disposal services,

- any assistance in relation to the provision of our products or services to you (including, without limitation, processing, effecting and verifying sales, orders, refunds and/or exchanges relating to products available for sale in our shops or through our website, and other customer service),
- hosting, maintenance and/or support services in respect of our website, mobile applications and/or your online account; and/or
- any other front-end, back-end or ancillary services required directly or indirectly to enable us to carry out any of the purposes specified at Paragraphs 1.2 and 1.3 (or a directly related purpose) ("Third Party Service Providers").

These Third Party Service Providers are under a duty of confidentiality to us and/or our Affiliates, and are only permitted to use your personal data in connection with the purposes specified in this Privacy Policy, and not for their own purposes (including direct marketing).

1.6 Your personal data will be retained by us and will be accessible to our authorised employees, our Affiliates and Third Party Service Providers engaged by us for any of the purposes stated in this Privacy Policy. You authorise us to (a) disclose all or any of your personal data to such third parties, and (b) collect your personal data from any other sources available to us (including credit referral agencies).

1.7 Insufficient or incorrect personal data provided to us by you may result in delays or failure in providing the products or services purchased by you.

## **2. Confidentiality of personal data**

2.1 Personal data provided to us by customers or visitors to this website will be kept confidential and will only be disclosed for the purposes stated in this Privacy Policy. URAH may disclose personal data to third parties who perform certain tasks relating to the provision of our products or services to our customers or to visitors to this website. All such third parties are required by us to use the personal data strictly to provide the products or services, and are required to maintain the confidentiality of the personal data.

2.2 Any questions, comments, suggestions or information (other than personal data) sent or posted to this website by customers or visitors will be deemed voluntarily provided to us on a non-confidential and non-proprietary basis. URAH may use, reproduce, disclose, transmit, publish, broadcast or post elsewhere such information in connection with the development, manufacture and marketing of products or services, to meet the needs of our customers or visitors or for any other purpose.

2.3 URAH will only disclose your personal data without notice to you if required to do so by law, or in the good faith belief that such disclosure is necessary to:

- Comply with legal process, or under compulsion of an order of court or governmental agency served on us
- Protect our rights, property or safety, its employees, customers, visitors or others

2.4 This Privacy Policy applies only to personal data collected via this website. URAH are not responsible for the privacy practices or policies of other websites accessible via this website. By activating a link (eg, by clicking on the banner of an advertiser), you leave this website and URAH do not have control over any personal data or any other information you give to any other person or entity after you have left this Website.

## **3. Information collected by cookies**

3.1 Our Website may pass a "cookie" (a string of information that is sent by a website to reside in your computer's hard drive and/or temporarily in your computer's memory). The purpose of a cookie is to tell the web server that you have returned to a particular page, to retain log-in information or to remember preferences and enhance your experience on our website. URAH may allow third parties to set cookies through our website in order to help us manage and analyze the performance of our website. You may set your browser to decline cookies. If you do so, you may not be able to fully experience some interactive features of our website.

## **4. Collection of computer data**

4.1 When you visit this website, our company servers automatically records information that your browser sends whenever you visit a website. This information may include:

- Your computer's IP address
- Browser type
- websites visited before our website
- Pages visited within our website (including time spent on those pages)
- Other items and information searched for on our website, access times and dates etc

4.2 This information is collected for analysis and evaluation in order to help us improve this website, and the services and products URAH provide. This information will not be used in association with any personal data.

## **5. Access request; Withdrawal of consent; Updating of personal data**

5.1 You may contact us via email (support@Urah.com.sg) or by telephone (+65 6746 8884) to (a) request for access to your personal data, (b) update your personal data, (c) withdraw your consent to our use or disclosure of your personal data, or (d) terminate your online account.

5.2 Requests to withdraw your consent to use or disclose your personal data may result in delays or failure to provide you with the products or services purchased from us.

5.3 You may also update or correct your personal data by accessing your online account with us.

5.4 Every email URAH send via our sending infrastructure will contain an unsubscribe link which is both clearly visible and easy to use. The unsubscribe functionality will not require you to send an unsubscribe request via email or to log in to your user account first.

5.5 The unsubscribe form will comply to all five of the following:

- The form will not use persuasive language to entice you to remain subscribed,.
- The form will not contain advertising,.
- The unsubscribe process will not lead to additional forms, pages or links, or involve any additional unsubscribe processes,.
- Unsubscribing will be cost-free, and.
- The unsubscribe process will not be hidden behind a login and/or password process.

## **6. Security of personal data**

6.1 Personal data collected by us will be (a) safely and securely stored, and (b) disposed when no longer needed by us for business or legal purposes.

## **7. Changes to Privacy Policy**

7.1 URAH may change this Privacy Policy at any time without prior notice to our customers or visitors. Any changes to this Privacy Policy will be published on this website.

## **8. Contact Us**

8.1 If you have any questions about our data protection policy or practices, you may contact our Data Protection Officer via email (support@urah.com.sg) or by telephone (+65 6476 8884).

8.2 All our emails will contain a link to this privacy policy and the physical, summonable address of our company: 51, Ubi Avenue 1 #05-13 Singapore 408933