

## STARHUB'S DATA PROTECTION POLICY

**PLEASE READ THESE TERMS CAREFULLY AS THEY MAY HAVE IMPORTANT CONSEQUENCES FOR YOU.**

### **ABOUT THESE TERMS & CONDITIONS**

This is StarHub's data protection policy for all our customers and users of our website, online store and Services, including online Services.

The purpose of this document (the "**Data Protection Policy**") is to inform you of how we manage Personal Data which is subject to Singapore's Personal Data Protection Act 2012 as may be changed from time to time (the "**Act**"). Please read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any Products and Services (as defined in Clause 3.2 below) offered by us, you agree and consent to StarHub (including its related corporations and business units) (collectively, the "**Companies**"), as well as their respective representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties in the manner outlined in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which any of the Companies may have at law to collect, use or disclose your Personal Data.

As part of our efforts to ensure that we properly manage, protect and process your Personal Data, we may, from time to time, update this Data Protection Policy to ensure that this Data Protection Policy is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to any rights you may have at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website. Please ensure that you visit our website regularly to obtain updated information on the handling of your Personal Data.

### **DATA PROTECTION TRUSTMARK CERTIFICATE**

We are also proud to share that we have been awarded the Data Protection Trustmark (DPTM) certification, which was launched in January 2019 by Infocomm Media Development Authority (IMDA).

What does this mean for you? It means you can rest assured that your personal data is safe with us, and we have the DPTM to prove it.

Find out more about DPTM at [www.imda.gov.sg/dptm](http://www.imda.gov.sg/dptm)



## **I. PERSONAL DATA**

- 1.1 In this Data Protection Policy, personal data refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have, including data in our records as may be updated from time to time ("**Personal Data**").
- 1.2 Personal Data that you may provide to us include (depending on the nature of your interaction with us), amongst others, your name, NRIC, passport or other identification number or information, telephone number(s), mailing address, email address, credit history, geographical location, network data, computer network, device identifiers or information and any other information relating to any individual which you have provided us in any form submitted to us, or via other forms of interaction with you.

## **2. COLLECTION OF PERSONAL DATA**

- 2.1 Generally, we collect Personal Data in the following ways:-
- 2.1.1 when you submit an application form or other forms relating to any of the Products and Services;
  - 2.1.2 when you interact with our customer service officers, for example, via telephone calls, letters, face-to-face meetings, emails or social media;
  - 2.1.3 when you use some of our Services, for example, websites and apps including establishing any online accounts with us;
  - 2.1.4 when you purchase or obtain third party services through us;
  - 2.1.5 when you request that we contact you, be included in an email or other mailing list;
  - 2.1.6 when you respond to our promotions, initiatives or to any request for additional Personal Data;
  - 2.1.7 when you are contacted by, and respond to, our marketing representatives and customer service officers;
  - 2.1.8 when we receive references from business partners and third parties (e.g. where you have been referred by them);
  - 2.1.9 when we seek information from third parties about you in connection with the Products and/or Services you have applied for; and

- 2.1.10 when you submit your Personal Data to us for any other reasons, including when you sign up for a free trial of any of the Products and Services or when you express your interest in any of the Products and Services.
- 2.2 If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes set out in this Data Protection Policy.
- 2.3 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the Products and Services you have requested.

### **3. PURPOSES FOR THE COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA**

This Clause describes the purposes for which we collect, use and disclose your Personal Data.

- 3.1 Generally, we collect, use and disclose your Personal Data for the following purposes:-
  - 3.1.1 to respond to your queries and requests;
  - 3.1.2 to manage our administrative and business operations and complying with internal policies and procedures;
  - 3.1.3 to facilitate business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving any of the Companies;
  - 3.1.4 to match any Personal Data held which relates to you for any of the purposes listed in this Data Protection Policy;
  - 3.1.5 to resolve complaints and handle requests and enquiries;
  - 3.1.6 to prevent, detect and investigate crime and analyse and manage any commercial risks;
  - 3.1.7 to provide media announcements and responses;
  - 3.1.8 to monitor or record phone calls and customer-facing interactions for quality assurance, employee training, performance evaluation and identity verification purposes;
  - 3.1.9 to analyse, trouble-shoot and improve network connectivity and performance relating to any of the Products and Services;

- 3.1.10 legal purposes (including but not limited to obtaining legal advice and dispute resolution);
  - 3.1.11 to conduct investigations relating to disputes, billing, suspected illegal activities or fraud;
  - 3.1.12 to meet or comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on us (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and
  - 3.1.13 purposes which are reasonably related to any of the above purposes in this Clause 3.1 or for any other purpose which we may notify you at the time of obtaining your consent.
- 3.2 In addition, if you are a customer or an employee of an organisation which is a customer of StarHub or StarHub's Strategic Partners<sup>1</sup> (including but not limited to the purchase, subscription or use of our mobile, broadband, tv, voice (including international direct dialling), data and/or cloud computing products and services, or the products and services of StarHub's Strategic Partners (collectively, the "**Products and Services**")), we collect, use and disclose your Personal Data for the following purposes:-
- 3.2.1 opening or continuation of accounts and establishing or providing you with the Products and Services you subscribe to (including but not limited to service activation, service operations, service delivery and order processing);
  - 3.2.2 facilitating the continuation or termination of your subscription to the Products and Services (including but not limited to administering subscription arrangements, account maintenance, account closure, processing renewal of contracts and customer relationship management);
  - 3.2.3 facilitating the daily operation of the Products and Services (including but not limited to billing, customer service, customer verification, technical support, network maintenance and troubleshooting);
  - 3.2.4 facilitating third party services if purchased, obtained, administered or processed through us;
  - 3.2.5 managing and executing our service-level agreements (or Customer Service Warranties) with you if any;
  - 3.2.6 processing of payment instructions, GIRO, direct debit facilities and/or credit facilities requested by you;

---

<sup>1</sup> "**Strategic Partners**" are organisations which share a close business relationship with us in areas such as marketing collaborations and co-branding.

- 3.2.7 enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by our service partners);
- 3.2.8 administering and processing any insurance claims and payments arising under the respective policies;
- 3.2.9 credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies);
- 3.2.10 generating internal reports (including but not limited to annual, operational and management reports);
- 3.2.11 processing referral payments and commission fees to our external partners;
- 3.2.12 administering fee adjustments, refunds and waivers;
- 3.2.13 notifying you of your entitlements under any loyalty and reward programmes with us;
- 3.2.14 analysing your use of the Products and Services so as to help us improve, review, develop and efficiently manage the Products and Services offered to you; and
- 3.2.15 purposes which are reasonably related to any of the above purposes in this Clause 3.2 or for any other purpose which we may notify you at the time of obtaining your consent.

### **StarHub Additional Purposes**

3.3 Furthermore, where permitted under the Act:-

- 3.3.1 StarHub and our Strategic Partners may also collect, use and disclose your Personal Data for the following additional purposes (the "**StarHub Additional Purposes**"):-
  - 3.3.1.1 analytics and tracking, including facilitating the sale of analytical data;
  - 3.3.1.2 conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes in relation to the Product and Services, and to improve our service delivery and your customer experience at our touchpoints;
  - 3.3.1.3 providing additional Products and Services and benefits to you, including promotions and loyalty and reward programmes from us and our Strategic Partners;
  - 3.3.1.4 matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of the Products and Services;

- 3.3.1.5 generating leads and managing marketing activities for StarHub and our Strategic Partners' Products and Services;
- 3.3.1.6 administering lucky draws, contests, competitions and marketing campaigns, and personalising your experience at our touchpoints and our Strategic Partners' touchpoints;
- 3.3.1.7 communicating to you advertisements involving details of the Products and Services, special offers and rewards, either to our customers generally, or which we have identified to be of interest to you (including but not limited to upselling, cross selling and telemarketing);
- 3.3.1.8 organising promotional events and corporate social responsibility projects; and
- 3.3.1.9 purposes which are reasonably related to any of the above purposes in this Clause 3.3.1 or for any other purpose which we may notify you at the time of obtaining your consent.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed for the StarHub Additional Purposes to vendors or other third party service providers in connection with promotions and services offered by us and our Strategic Partners.

#### **Preferred Partners Additional Purposes**

- 3.3.2 We may also collect, use and disclose your Personal Data to our Preferred Partners<sup>2</sup> as well as for the following purposes (the "**Preferred Partners Additional Purposes**" (also known as "**ADV**" in our communication channels) as detailed below):-
  - 3.3.2.1 conducting market research and surveys to enable us to understand and determine customer location, preferences and demographics to develop special offers and marketing programmes with our Preferred Partners;
  - 3.3.2.2 matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision, marketing or offering of products and services (including promotions) by our Preferred Partners;
  - 3.3.2.3 generating leads and managing marketing for the products and services offered by our Preferred Partners;

---

<sup>2</sup> "**Preferred Partners**" are organisations which engage us to offer exclusive or other attractive promotions to our customers.

- 3.3.2.4 administering lucky draws, contests, competitions and marketing campaigns in connection with the products and services offered by our Preferred Partners;
- 3.3.2.5 sending you informational, recruitment and other notification messages communicated by our Preferred Partners;
- 3.3.2.6 communicating to you advertisements involving details of the products, services, special offers and rewards offered by our Preferred Partners, either to our customers generally, or which we or our Preferred Partners have identified to be of interest to you (including but not limited to upselling, cross selling and telemarketing); and
- 3.3.2.7 purposes which are reasonably related to any of the above purposes in this Clause 3.3.2 or for any other purpose which we may notify you at the time of obtaining your consent.

In addition, where permitted under the Act and subject to the provisions of any applicable law, your Personal Data may be disclosed, for the Preferred Partners' Additional Purposes, to vendors or other third party service providers in connection with promotions and services offered by our Preferred Partners.

However, please be assured that we do not disclose your Personal Data to our Preferred Partners for the purposes of the above unless your consent has been expressly obtained.

- 3.4 If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), We may, from time to time, contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our Products and Services or those products and services offered by our Preferred Partners (including discounts and special offers).
- 3.5 In relation to particular Products and Services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
- 3.6 You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. To do so, you may contact us using the contact details in Clause 6 below.

#### **4. DISCLOSURE OF PERSONAL DATA**

This Clause describes how your Personal Data may be disclosed by us.



- 4.1 Subject to Clause 4.2 below, we may share aggregated, non-personally identifiable information with the public and with our partners, such as our vendors, advertisers and other service providers.
- 4.2 We will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed for the purposes listed in Clause 3 above or for any purpose allowed under any applicable law or regulations, to the following parties:-
- 4.2.1 our related corporations and employees to provide Content, Products and Services to you, address your questions and requests in relation to your customer accounts, subscription and billing arrangements with us as well as our Products and Services and to activate, deactivate, install, maintain and operate our systems and/or services;
  - 4.2.2 companies providing services relating to insurance and consultancy to us;
  - 4.2.3 agents, contractors or third party service providers who provide operational services to us, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or any other services;
  - 4.2.4 vendors or third party service providers in connection with marketing promotions and services offered by us, our Strategic Partners or our Preferred Partners;
  - 4.2.5 commercial shops and retailers in relation to providing rewards and benefits;
  - 4.2.6 other telecommunications, content or other service providers to facilitate their provision of content or services, or for interconnection, inter-operability, system operation and maintenance and billing between service providers;
  - 4.2.7 any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
  - 4.2.8 collection and repossession agencies in relation to the enforcement of repayment obligations for debts;
  - 4.2.9 credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness;
  - 4.2.10 external banks, credit card companies and their respective service providers;
  - 4.2.11 our professional advisers such as auditors and lawyers;
  - 4.2.12 relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and

4.2.13 any other party to whom you authorise us to disclose your Personal Data to.

- 4.3 You understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted to our websites, online Services and apps; any transmission is at your own risk. Additionally, we cannot assume responsibility for any unauthorised use of your Personal Data by third parties which are wholly attributable to factors beyond our control.
- 4.4 If such disclosure involves transfer of your Personal Data outside Singapore, a standard of protection that is comparable to that under this Data Protection Policy shall be provided.

## **5. PROTECTION OF PERSONAL DATA**

This Clause describes how your Personal Data will be protected by us.

- 5.1 We are committed to protecting your Personal Data, and we will ensure that reasonable security arrangements are in place to prevent unauthorised access, collection, use, disclosure, copying modification or disposal of your Personal Data.

## **6. RETENTION OF PERSONAL DATA**

This Clause describes how your Personal Data may be retained by us.

- 6.1 We may retain your personal data while providing our Products and Services and as long as retention is necessary for legal or business purposes..

## **7. USE OF COOKIES**

This Clause describes the use of cookies on our websites.

- 7.1 We use cookies<sup>3</sup> on our websites for the following purposes:-
- 7.1.1 to enable certain features and functions on our websites (e.g. remembering your user-id, favourite channel selections, browsing and other service preferences);
  - 7.1.2 to build up a profile of how you and other users use our websites and/or other third-party websites;
  - 7.1.3 to improve the efficiency of our websites;
  - 7.1.4 to administer Services to you and to advertisers;

---

<sup>3</sup> A "cookie" is a small piece of information that is placed on your computer when you visit certain websites.

- 7.1.5 to establish usage statistics;
  - 7.1.6 to enable authentication cookies to identify you when you perform online transactions with us; and
  - 7.1.7 to enable you to share our content easily on social networks.
- 7.2 Most internet browsers provide you the option of turning off the processing of cookies (please see the "**help**" section of your browser), but this may result in the loss of functionality, restrict your use of our websites and/or delay or affect the way in which our websites operate.
- 7.3 Advertisements on our websites may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a particular advertisement (or use the services of third parties to view a particular advertisement), and to track how many people have seen it more than once.
- 7.4 StarHub is not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party website links that appear on our websites.

## **8. WITHDRAWAL OF CONSENT, ACCESS AND CORRECTION OF YOUR PERSONAL DATA**

This Clause describes how you can withdraw your consent or obtain access and make corrections to the Personal Data that you have provided us.

- 8.1 If you would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy, the following methods of withdrawal will apply:-
- 6.1.1 for our prepaid card customers, please visit the StarHub Do Not Call Registry on our website; and
  - 6.1.2 for our postpaid customers and customers who are on recurring payment mode, please login to My Account Manager or through your My StarHub App.
- 8.2 Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, it may take up to 30 working days for your withdrawal to be reflected in our systems. In the meantime, you may still receive marketing or promotional materials/communication from us. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the Products and Services that you hold or have subscribed to with us.
- 8.3 If you would like to obtain access and make corrections to your Personal Data records, please contact us in writing as follows:-

**Data Protection Officer**  
StarHub Ltd

67 Ubi Avenue I  
#05-01 StarHub Green  
Singapore 408942

or through email at [dpo@starhub.com](mailto:dpo@starhub.com).

- 8.4 Please note that if your Personal Data has been provided to us by a third party (e.g. a referrer), you should contact that organisation or individual to make such queries, complaints, and access and correction requests to us on your behalf.
- 8.5 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be in a position to continue to provide the Products and Services to you or administer any contractual relationship that is already in place, which in turn may result in the termination of any agreements that you have with us, resulting in you being in breach of your contractual obligations or undertakings. StarHub's legal rights and remedies in such an event are expressly reserved.

## **9. GOVERNING LAW**

This Data Protection Policy and your use of this website is governed by Singapore law.