

Version 2.0 Privacy Policy

Privacy Statement

1. This Privacy Policy (“**this Policy**”) explains how the A-Smart group of companies collects, holds and uses information about individual persons who use its internet-based services.
2. By using this website, you consent to the collection and use of information as set forth in this privacy policy. You also acknowledge that A-Smart Holdings may periodically change, modify, add, remove or otherwise update this privacy policy at its own discretion without prior notification. However, we will always handle your Personal Information in accordance with the Privacy Policy that is in effect at the time of collection. It is our intention to post changes to our privacy policy on this page so that you are fully informed concerning the types of information we are gathering, how we use it, and under what circumstances it may be disclosed. Our Privacy Policy is located on our homepage.
3. Personal data refers to data about you (except data that is not provided solely for personal purposes) that specifically identifies you or data about you which combined with other information that A-Smart Holdings has or is likely to have access to can be used to identify you (“**Personal Data**”).
4. The term "Personal Data" as used in this Privacy Policy refers to information such as your name, birth date, e-mail address, mailing address, or telephone number that can be used to identify you. Generally, we will only process your Personal Data as described in this Privacy Policy. However, we reserve the right, to conduct additional processing to the extent permitted or required by law, or in support of any legal or criminal investigation. The next sections explain how and when we collect Personal Data from you.

Intended use of Personal Data by A-Smart Holdings

5. We may collect and use Personal Data to provide you with products or services, to bill you for products and services you request, to market products and services which we think may be of interest to you or to communicate with you for other purposes which are evident from the circumstances in which we have informed you when we collected Personal Data from you.

Non-disclosure of Personal Data

6. We will not sell, share, or otherwise distribute your Personal Data to third parties except as provided in this Privacy Policy.
7. We may disclose your Personal Data to companies within the A-Smart group of companies that agree to treat it in accordance with this Privacy Policy. Personal Data may also be transferred to third parties who act for or on our behalf, for further processing in accordance with the purpose(s) for which the data were originally collected or may otherwise be lawfully processed, such as services delivered directly or through third party, evaluating the usefulness of this website, marketing, data management or technical support. These third parties have contracted with us to only use Personal Data for the agreed upon purpose, and not to sell your Personal Information to third parties or disclose it to other third parties except as may be required by law, as permitted by us or as stated in this Privacy Policy.
8. Personal Data collected from you may also be transferred to a third party in the event that the business of this site or a part of it and the customer data connected with it is sold, assigned or transferred, in which case we would require the buyer, assignee or transferee to treat Personal Data in accordance with this Privacy Policy. Also, Personal Data may be disclosed to a third party if we are required to do so because of an applicable law, court order or governmental regulation, or if such disclosure is otherwise necessary in support of any criminal or other legal investigation or proceeding here or abroad.

Right of access, correction and objection

9. Whenever we process Personal Data, we take reasonable steps to ensure that your Personal Data is kept accurate and up-to date to serve you better
10. We will provide you with the ability to discontinue collecting or disclosing Personal Data of yourself. However, if such processing is required by the law or other investigations regarding a criminal offence we are obliged to provide this information to the relevant authorities.
11. In the case of electronic direct marketing (EDM), we will provide you with a method to opt out of receiving further marketing materials or with a method to opt in. Alternatively if you wish to continue or discontinue receiving EDM from us you can email us at corporate.enquiries@a-smart.sg.

Security and confidentiality

12. To ensure the security and confidentiality of Personal Data that we collect online, we use data networks protected, inter alia, by industry standard firewall and password protection. In the course of handling your Personal Data, we take measures reasonably designed to protect that information from loss, misuse, unauthorized access, disclosure, alteration or destruction.

Transfer Abroad

13. As necessary, A-Smart Holdings will transfer Personal Data abroad only if the following requirements are met:
 - a) The transfer is necessary for the performance of a contract between the organization and the individual (for example, if the organization is a data intermediary of the individual pursuant to a contract between them in relation to the transfer), or to do anything at the individual's request with a view to his entering a contract with the organization through A-Smart Holdings.
 - b) The transfer is necessary for the conclusion or performance of a contract between A-Smart Holdings and a third party which is entered into at the individual's request, or which a reasonable person would consider to be in the individual's interest;
 - c) The transfer is necessary for a use or disclosure in certain situations where the consent of the individual is not required under the PDPA, such as use or disclosure necessary to respond to an emergency that threatens the life, health or safety of an individual. In such cases, A-Smart Holdings may only transfer personal data if it has taken reasonable steps to ensure that the personal data will not be used or disclosed by the recipient for any other purpose;
 - d) The personal data is publicly available in Singapore.

"Cookie" and internet tag use

14. Some of the information we do collect includes how many times you have visited our website, the pages you have visited and the website you came from and some of the searches you performed. Such information is used by us to help improve the content of the site and to compile aggregate statistics about individuals using our site for internal, market research purposes. In doing this, we may install "cookies" that collect information on your domain name, your internet service provider, your operating system, and the date and time of access. A "cookie" is a small piece of information which is sent to your browser and stored on your computer's hard drive. Cookies do not damage your computer. You can set your browser to notify you when you receive a "cookie," this will enable you to decide if you want to accept it or not. If you do not want us to install cookies, please email us at corporate.enquiries@a-smart.sg. As our systems are based on user feedback via cookies use, we would like to inform you that if you do not accept cookies you may not be able to use the functions available on the website on that particular browser software.
15. If you use parts of the site that require registration to access content, we will place an "authentication cookie" on your computer. This allows you to leave and return to these parts of the website without re-authenticating yourself
16. If you have Adobe Flash installed on your computer. These cookies are used to store data needed to play video and audio content and store your user preferences
17. To service you better, A-Smart Holdings would like to understand how our visitors use our websites through web analytics services. Data intermediaries such as Google Analytics may apply "first party analytics cookie" and "3rd party cookies" in conjunction with internet tags (also known as action tags, single-pixel GIFs, clear GIFs, invisible GIFs and 1-by-1 GIFs). These tags/cookies are placed on both online advertisements that bring users to different sites and to different pages on our website. We use this technology to measure the visitors' responses to our sites and the effectiveness of our advertising campaigns (including how many times a page is opened and which information is consulted) to evaluate the success of our marketing campaigns. Every third party data intermediary contracted with us is to comply with our privacy policy before we issue

Keeping your Personal Data Accurate

18. Should you wish to update your Contact information with us which includes of mailing and collection location, please contact A-Smart Holdings at marketing@a-smart.sg. For ease of communication and verification please provide your receipt number, contact name and items purchased for cross referencing.

Updates

19. A-Smart Holdings reserves the rights to make amendment to its Policies without prior notice without consent. These amendments will be effective immediately upon its release on our website.

Contact Us

20. If you have any queries or complaints about this Privacy Policy, or if you would like to make any recommendations or comments to improve the quality of our Privacy Policy, please email us at corporate.enquiries@a-smart.sg