

LPB Privacy Policy

This Privacy Policy ("**Privacy Policy**") explains to you how Symphony W&C Pte Ltd, a company duly incorporated in Singapore under UEN 201318226D and having its registered address at 4 Kensington Park Road, 557256 Singapore, operating under the brand "LPB Market", ("**we**", "**us**", "**the Company**" or "**LPB**"), manages your personal data. Please read through this Privacy Policy carefully so that you know and understand the purposes for which we collect, use and disclose your personal data.

By browsing, accessing or using the Website and/or the Service, you consent to us collecting, using, disclosing, retaining and processing your data in accordance with this Privacy Policy. If you do not agree to any of the terms in this Privacy Policy, you must not use or access the Service, or the Website.

We reserve the right, at our sole discretion, to change, modify or otherwise alter this Privacy Policy at any time. Should you have any questions regarding this Privacy Policy, please contact us using the contact information listed at the end of this Privacy Policy.

This Privacy Policy covers our collection, use and disclosure of your information through the Service and the Website. Unless otherwise provided herein, it does not cover any collection, use or disclosure by third parties of your information or personal data through the Service, or through websites, software, products or services that we do not control or own, or through any third party applications, features or services made available via the Service, or the Website. This Privacy Policy does not address and we are not responsible for, the privacy practices of websites operated by third parties, whether they are linked to or otherwise accessible from the Service and the Website.

1. DEFINITIONS

When used in this Privacy Policy, in addition to terms defined elsewhere in these Terms, the following terms shall have the following meanings:

- "**include**" (and its derivatives, such as "including" and "includes") means to include without limitation and every occurrence of this term shall be construed as defined aforesaid, whether or not capitalised;
- "**LPB, We, Us**" means Symphony W&C Pte Ltd, a company duly incorporated in Singapore under UEN 201318226D and having its registered address at 4 Kensington Park Road, 557256 Singapore, operating under the brand "LPB Market", as well as any corporation which in relation to LPB is a holding company or a subsidiary of any such holding company of a corporation (or a subsidiary of a corporation) at least one-fifth of the issued equity share capital of which is beneficially owned by the person concerned or an associate thereof under the preceding part of this definition.
- "**Personal Data**" means any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that

natural person. Personal Data does not include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

- **“Processing”** means any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **“Service”** means the online grocery store operated by LPB on the Website, and any and all services, features and functionalities which we may offer in connection therewith from time to time, and also includes the web through which the Service is provided and all upgrades, updates and enhancements thereto;
- **“User, You, Your”** means any person or Entity using the Service or the Website.
- **“Website”** means the website owned and operated by LPB at www.petiteboutique-sg.com, such as may be amended or updated by us from time to time.

2. WHAT KINDS OF INFORMATION WE COLLECT

The categories of Personal Data we collect:

- Identity Data – first name, last name, age (above 18 y.o.), date of birth, photograph/portrait, user account number;
- Contact Data – email address, delivery address, invoicing address, country of residence, phone number;
- Transactional Data – information regarding your use of the Service and regarding your orders such as order number, order value, order date, item name, item value, item amount, item weight;
- Technical Data – information you transmit or receive using the Service and which identifies you or another person, such as internet protocol (IP) address, browser type and version, browser plug-in types and versions, devices used to access the Website, purchasing behaviour and other analytical and functional tools to improve the Website.

3. WHEN WE COLLECT PERSONAL DATA

- 3.1. We collect, use, retain and process the following Personal Data from you and any devices (including mobile devices) you may use when you use the Service, register for an account with us, provide us information (via email or through the Service), update or add information to your account, subscribe to a standard or premium membership, send us messages, comments, questions, testimonials or suggestions, participate in blogs, forums, message boards, chat rooms, profile pages, polls, surveys and other communication channels and services in relation to the Service, or when you otherwise correspond with us regarding the Service. Such Personal Data may be voluntarily

provided by you, or automatically collected by us or sent to us when you use the Service and/or Website.

- 3.2. When you ask us to provide goods/services for the benefit of a third party, you shall be legally authorized by said third party to disclose his/her Personal Data to us, if any. This authorization shall cover all relevant Personal Data.

4. PURPOSES OF PROCESSING

- 4.1. We process Personal Data for the following purposes, based on the following legal grounds and for the following retention period :

4.1.1. WEBSITE MANAGEMENT:

- a) Categories of data processed : Identity Data (age) and Technical Data;
- b) Nature and purposes of the processing: To improve the Website, make sure the User is of a legal age to use the website, personalize the user experience, enhance user interactions with the Website and adapting the content display to the technology available; Technical Data are processed for analytics and targeting purposes;
- c) Legal basis : Processing is based on LPB's legitimate interest to conduct its business, improve its product and service offerings, and facilitate communication ;
- d) Retention period : within 12 months after the data has been generated or provided.

4.1.2. E-COMMERCE SERVICES / MARKETING :

- a) Categories of data processed : Identity Data, Contact Data, Transactional Data, Technical Data;
- b) Nature and purposes of the processing: processing, recording, monitoring and fulfilling orders and deliveries; communication with the Users about their account and our services, including to confirm and update them on the status of their orders and deliveries; to arrange home deliveries; to send the updates and publications, where the Users have requested or consented to be on our mailing list; to send information on any updates or changes to our terms and conditions, guidelines, policies and/or other administrative information; to send information regarding the Service and keep Users informed of new features, products, promotions, offers, surveys, events and other matters which may be of interest to them; for accounting and reporting purposes.
- c) Legal basis : E-Commerce Services: Processing is necessary to perform a contract with the User, or in order to conclude one ; Marketing: Processing is based on your consent ;

- d) Retention period : Personal Data will be stored for as long as you have an active account, and for a period of 7 years thereafter, or for the period of the statute of limitation to the extent the Personal Data may have legal effects.

4.1.3. MEMBERSHIP SUBSCRIPTIONS:

- a) Categories of data processed : Identity Data, Contact Data, Transactional Data, Technical Data;
- b) Nature and purposes of the processing: to register the User, identify the User's personality, the subscription plan and the benefits it comes with ; to physically identify the User when using the benefits and purchasing items at the shop ; to congratulate on the birthdays and send the reminder to claim birthday gifts ; to identify the User, his level of subscription and the benefits it comes with ; to send the updates and publications, where the customers have requested or consented to be on our mailing list; to send information on any updates or changes to our terms and conditions, guidelines, policies and/or other administrative information; to send information regarding the Service and keep customers informed of new features, products, promotions, offers, surveys, events and other matters which may be of interest to them ; to be able to differentiate Users with identical name ; to identify in which country the membership was purchased ; to keep Users informed of new features, products, promotions, offers, surveys, events and other matters which may be of interest to them ; for accounting and reporting purposes ; for auto-login and understand user preferences (language) ;
- c) Legal basis : Processing is necessary to perform a contract with the User, or in order to conclude one ;
- d) Retention period : Personal Data will be stored for as long as you have an active membership subscription, and for a period of 7 years thereafter, or for the period of the statute of limitation to the extent the Personal Data may have legal effects.

4.2. To accomplish these purposes, we may combine personal and usage information we collect. The Personal Data requested with regard to the creation and use of a user account is necessary for the performance of the Service and to fulfil your requests. Further Personal Data you provide through linking different user accounts, is done so on a voluntary basis or to meet a request you've formulated.

4.3. We limit the collected information to support the intended purpose of collection. If you cannot be identified by the data we collect, for example when personal data has been anonymized, then this data is not considered Personal Data by this Privacy Policy.

5. HOW WE DISCLOSE INFORMATION OUTSIDE LPB

5.1. LPB DOES NOT SELL OR RENT YOUR PERSONAL DATA TO ANY THIRD PARTIES WHATSOEVER. We only disclose your Personal Data with your prior consent or as provided in this Privacy Policy.

5.2. We may transfer or disclose your Personal Data within LPB. Moreover, we may disclose or otherwise make available your Personal Data, including transaction information, to other service providers and vendors for the purpose of managing, providing, and improving LPB goods/services. Examples are shipping companies, vendors, payment companies, credit card processors, financial institution partners, hosting and maintenance providers, data storage and management providers. Generally, companies that help us to furnish the Service and to improve our product and service offerings and our Website. A list of sub-processors, i.e. companies to which your Personal Data may be disclosed in this framework, is available on this webpage: [https://cdn.shopify.com/s/files/1/0938/5896/files/List of Subprocessors - SINGAPORE.pdf?v=1658844470](https://cdn.shopify.com/s/files/1/0938/5896/files/List_of_Subprocessors_-_SINGAPORE.pdf?v=1658844470)

In so doing, your Personal Data may be transferred to such recipients outside the European Economic Area. In the case of any such transfers, we will use best efforts to ensure that your Personal Data is adequately safeguarded through the implementation of standard data protection clauses and all other safeguards according to applicable laws and regulations. For more information on such measures contact contact@petiteboutique-sg.com.

5.3. From time to time, we may collaborate with other third parties to organise joint marketing and promotional campaigns, offers or contests, and may require disclosure of your information to such third parties. For example, where a Promotion or Voucher is specially offered to customers of our third-party partner, we may share your information with that partner to the extent relevant to such promotional campaign.

5.4. We may access, preserve and disclose your information in other special circumstances, namely (a) to enforce the Terms of Use; (b) to respond to claims that any content violates the rights of third parties; (c) to protect the safety, property, or other rights of LPB, LPB customers, associates, or any other person; or (d) where otherwise required by law. Examples include protecting the health or safety of customers, or addressing crimes committed on the Website. LPB may provide your Personal Data in response to a search warrant, subpoena or other legally valid inquiry or order, or as otherwise required by applicable law.

5.5. We may transfer any information we have about you in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of LPB or as part of a corporate reorganization or other change in corporate control.

6. YOUR RIGHTS

6.1. As data subject you have the following rights:

- To request access to your Personal Data;
- To obtain the rectification of any inaccurate Personal Data; If you wish to access, correct or rectify your Personal Data, you may do so by accessing your account settings through the Website.
- To obtain the erasure of Personal Data, under certain conditions;

- To limit the processing activities to which the Personal Data is subject, under certain conditions;
- To receive your Personal Data in a structured, commonly used and machine-readable format, and have the Personal Data transmitted to another controller, under specific conditions;
- If processing is based on consent, to withdraw consent at any time (although this does not impact the lawfulness of past processing activities);
- To lodge a complaint with the national data protection authority;
- To the extent any automated decision making would be involved, you have the right not to be subject to a decision (which engenders legal effects) based solely on automated decision making.

6.2. You can access, update and/or remove your Personal Data, including contact or account information, by sending us an email at contact@petiteboutique-sg.com. If your Personal Data has been communicated to us by a third party, you can either contact said third party or send us an email at contact@petiteboutique-sg.com.

7. COOKIES

In order to improve our products and services, we collect data by way of “cookies”. Cookies help us measure the number of visits, average time spent, page views and other statistics relating to your access to the Service on the Website. This information allows us to better administer the Service on the Website, and provide a more tailored and user-friendly service to our visitors and users. Cookies also enable you to use or access certain features or services of our Service on the Website, including the shopping cart and check-out features. For example, cookies help us store preferences or retrieve products in your shopping cart between visits, from our servers. Cookies are small data files that are sent to your browser from our Website and are stored on your computer’s or device’s hard drive. Each time you visit our Website from the same computer or device, the cookie will be retrieved from your computer or device, enabling our Website to recognise your computer or device as having previously visited our Website and thereby increase the functionality of our Website on your computer or device. Our cookies cannot be used to get data from your hard drive, to get your email address or any other data that can be traced to you personally. Most web browsers and devices can be set to notify you when you receive a cookie or to prevent cookies from being sent; if you use these features, you may limit the functionality we can provide you when you visit our Website.

Please refer to our [Cookie Policy](#) for more information.

8. SECURITY

We use commercially reasonable physical, administrative, technical and electronic measures and safeguards to protect your information from unauthorised access. Please be aware that no security measures that we take to protect your information is absolutely guaranteed to avoid unauthorised access or use of your Personal Data or is impenetrable. We hereby disclaim all liability for the security of your Personal Data, which may be

compromised by unauthorised entry, use or disclosure, hardware or software failure and other factors.

You are solely responsible for protecting your usernames and passwords that are used to access the Service and/or any Third Party Service, against unauthorised access and use and for all actions taken with such usernames and passwords. You must keep your username and password secure, and never disclose it to a third party. Because the information of your account is so sensitive, account passwords are encrypted, which means we can't see your passwords. We can't resend forgotten passwords either. We'll only reset them.

You acknowledge that if you lose control of your usernames and passwords, you may lose substantial control over your Personal Data and be potentially subject to legally binding actions taken on your behalf by an unauthorised user. If any of your usernames and passwords has been compromised for any reason, you should immediately change the same. You should also sign off once you have finished using a shared computer.

9. DIRECT MARKETING

We want to communicate with you in the ways that you want to hear from us. If you no longer want to receive marketing messages from us, you can click on the appropriate link at the bottom of our marketing emails. You may also send us an email at contatc@petiteboutique-sg.com. Please allow sufficient time for your preferences to be processed.

Please note that if you do opt out of receiving marketing-related communications from us, we may still send you important administrative messages in order to perform or execute a contract with you and that you cannot opt out of receiving such administrative or other important messages.

10. SENSITIVE INFORMATION

We ask that you do not send us, or disclose to us, any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, sexual orientation, criminal background or membership in past organisations, including trade union memberships) on or through the Service or otherwise.

11. LEGAL AGE

We are committed to protecting children's privacy. In order to protect the privacy of children, we do not knowingly collect or solicit personal data from those below the age of 18, or knowingly allow such persons to register an account with us. The Service is not intended for use by persons under 18 years of age. If you are under 18 years of age, please do not attempt to register for or to use the Service and/or the Website, or send us any personal data about yourself. If we become aware that we have inadvertently received Personal Data from a child under the age of 18, we will delete such information from our records.

12. LINKS TO OTHER WEBSITES

Our Website may contain links to other websites. A link to a third party's website does not mean that we endorse it or that we are affiliated with it. We do not exercise control over third-party websites. You access such third-party websites or content at your own risk. You should always read the privacy policy of a third-party website before providing any information to the website.

13. CLOSING YOUR ACCOUNT WITH US

If you wish to delete your account, please contact us by email at contact@petiteboutique-sg.com.

14. CHANGES TO PRIVACY POLICY

We may modify or revise the terms of this Privacy Policy at any time. Please check our Privacy Policy periodically for changes. We will post the date the Privacy Policy was last updated at the top of the Privacy Policy. The changes will go into effect on the "Last Updated" date shown in the revised Privacy Policy. We may additionally (but shall not be obliged to) notify you of changes to this Privacy Policy by:

- a. displaying the new terms on-screen when you next use the Service;
- b. email, via an online service or otherwise; or
- c. any combination of the foregoing.

Notwithstanding the foregoing, you agree that you are responsible for periodically reviewing the Privacy Policy for any changes and keeping yourself informed of the most up-to-date version of this Privacy Policy, at <https://petiteboutique-sg.com/privacypolicy>.

If you do not agree to any modification or revision to this Privacy Policy, you should stop using the Service immediately.

15. CONTACTING US / REPORTING VIOLATIONS

Please contact us by email in writing on contact@petiteboutique-sg.com providing your name, contact number and email address, if:

- a. you have any questions or feedback relating to your Personal Data or this Privacy Policy, or if you wish to report any violations or abuse of the Service;
- b. you wish to retrieve historical data; and/or
- c. you would like to review, correct, update, suppress, delete or otherwise limit our use of your Personal Data that has been previously provided to us.

In your request relating to (a), (b) and (c) above, please make clear (where applicable) what information you would like to have changed, or what records you wish to retrieve, and/or

otherwise let us know what limitations you would like to put on our use of your Personal Data. We will try to comply with your request as soon as and to the extent reasonably practicable. You agree that where you submit a request relating to (b), that we may charge you a fee to cover the cost of verifying your request and identity, and locating, retrieving, collating, copying and forwarding any records so requested. You acknowledge that we will not be able to remove your Personal Data from the database of any other Users with whom you have shared such information or from the databases of third parties which you previously authorised us to share such information with.