

# DATA PROTECTION NOTICE FOR SENDER

This Data Protection Notice ("Notice") sets out the basis which MXHL Pte Ltd ("uParcel", "we", "us", or "our") may collect, use, disclose or otherwise process personal data of persons in accordance with the Personal Data Protection Act ("PDPA") and all associated regulations and guidelines which may from time to time be issued by the Personal Data Protection Commission (PDPC) of Singapore. This Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or otherwise process personal data for our purposes.

## Personal Data

**1.** As used in this Notice:

**"person"** means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may enter or has entered into a contract with us for the supply of any products or services by us, or (c) has submitted a job or internship application with us; and

**"personal data"** means 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 access.

**2.** The types of personal data we may collect from you are generally as follows:

2.1 Basic personal information: Name, phone number, mailing address, email address, contact details

2.2 Customer service data: invoicing details and payment history, and other feedback from our partners or agents

**3.** Other terms used in this Notice shall have the meanings given to them in the Singapore Personal Data Protection Act (where the context so permits).

## Collection, Use and Disclosure of Personal Data

**4.** We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your

personal data to us (your “authorised representative”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection and use of personal data without consent is permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

**5.** We may collect, disclose or use your personal data pursuant to an exception under the Personal Data Protection Act or other written law such as during the following situations:

5.1 To respond to an emergency that threatens your life, health and safety or of another individual; and

5.2 Necessary in the national interest, for any investigation or proceedings.

**6.** We may collect and use your personal data for any or all of the following purposes:

6.1 processing your application to register to as a sender to use our service for delivery services.

6.2 providing you with information on our upcoming events or activities, where you have specifically requested to receive such information;

6.3 verifying your identity and the accuracy of your personal details and other information provided;

6.4 managing our operations and administer our relationships with beneficiaries and users of our programs, and business partners;

6.5 responding to, handling, and processing queries, requests, applications, complaints and feedback from you;

6.6 complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any government and/or regulatory authority; and

6.7 transmitting to any unaffiliated third parties, including our third-party service providers and agents, and relevant government and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes.

**7. We may disclose your personal data:**

7.1 with your consent, where such disclosure is required for performing obligations in the course of or in connection with our provision of the services requested by you;

7.2 to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations;

7.3 with your consent, to third party service providers, agents and other organisations we have engaged to perform any of the functions listed in Paragraph 6. above for us. Any third parties engaged by us will be contractually bound to keep all personal data confidential; or

7.4 any other party to whom you authorised us to disclose your personal data to, or where necessary, to undertake any action requested by you.

**8. If you choose not to provide us with your personal data for the purposes listed in paragraphs 6., you may submit a request in writing or via email to our Data Protection Officer at the contact details provided below or indicate in the personal data collection form submitted to us (if any). Whilst we respect your decision, please note that depending on the nature and extent of your request, we may not be in a position to continue our relationship with you (as the case may be). We shall, in such circumstances, notify you before continuing to process your request. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to carry out your request, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).**

**9. The purposes listed in Paragraph 6. may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).**

## **Withdrawal of Consent**

- 10.** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn by you in writing. You may withdraw your consent and request us to stop using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer. If you are unable to submit your request in writing or if you require any assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.
- 11.** Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving. Should we require more time to give effect to a withdrawal notice, we will inform you of the time frame by which the withdrawal of consent will take effect.
- 12.** Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in Paragraph 10. above.
- 13.** Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **Access to and Correction of Personal Data**

- 14.** If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below. If you require assistance with the submission of your request, you can ask to speak to or meet with our Data Protection Officer.

15. Before we accede to your access or correction request, we may need to verify your identity by checking identification document, and the legitimacy of your request.
16. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request in writing (including both electronic and non-electronic methods), we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
17. If your request relates to personal data which we are processing on behalf of another organisation, we will instead forward your request to the relevant organisation for their necessary action.
18. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

## **Protection of Personal Data**

19. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to authorised third parties and agents only on a need-to-know basis.
20. When we disclose your personal data to third parties in line with the purposes mentioned in paragraph 7., we will ensure that they provide sufficient guarantees to us to have implemented the necessary security measures to protect your personal data.
21. However, no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data and are constantly reviewing and enhancing our information security measures. In the event of a personal data breach, we will endeavour to notify the affected parties no later than within 3 calendar days from when we become aware of the breach.

## **Accuracy of Personal Data**

- 22. We will take reasonable steps to ensure that the personal data we collect about you is accurate, complete, not misleading and kept up-to-date.
- 23. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer at the contact details provided below.

## **Retention of Personal Data**

- 24. We may retain your personal data for as long as it is necessary to fulfil the purpose(s) for which it was collected, or as required or permitted by applicable laws.
- 25. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.
- 26. We dispose of or destroy such documents containing your personal data in a secure manner when the retention limit is reached and it is reasonable to assume that the permitted purpose is no longer being served by their retention.
- 27. For Senders, records will be kept for **3 months** after closure of account. It will be disposed of in a secure manner immediately after the said retention period

## **Cross-border Transfers of Personal Data**

- 28. Unless for business-related needs, we generally do not transfer your personal data to other jurisdictions. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA, including entering into an agreement with the receiving party to accord similar levels of data protection as those in Singapore.

## **Data Protection Officer**

**29.** You may contact our Data Protection Officer if you have any enquiry, feedback or complaint regarding our personal data protection policies and procedures, if you wish to make any request, or if you believe that information we hold about you is incorrect or out-dated.

**30.** You may contact our Data Protection Officer via the following contact information:

Telephone No: 6589 8763

Email: [data\\_protection@uparcel.sg](mailto:data_protection@uparcel.sg)

Address: 81 Ubi Ave 4, UB. One Building #06-08, Singapore 408803

## **Third Party Consent**

**31.** In the event you have provided personal data of third parties (e.g. your emergency contact person, family member) to us, we rely on you to have sufficiently obtained the prior consent of such third parties to allow us to collect, use and/or disclose their personal data.

## **Modifications**

**32.** This Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

**33.** We may revise this Notice at any time without any prior notice. Your continued use of our services and/or products constitutes your acknowledgement and acceptance of such changes.

Effective: 1 July 2022

Last Updated: 1 July 2022

## **DECLARATION**

1. I declare and warrant that all information submitted is accurate and complete to the best of my knowledge and that I have obtained consent from all third parties to provide their data to uParcel.
2. I understand and agree that if it is subsequently discovered that I have wilfully given incorrect information or withheld any relevant information, uParcel reserves the right to terminate its relationship with me without any notice or compensation.
3. I acknowledge that I have read, understood and agreed to the above Notice, and hereby consent to the collection, usage and disclosure of my personal data by uParcel for the purposes stated in the Data Protection Notice above.