

Personal Data Protection Act

White Beehoon Restaurant Pte Ltd (“WBH Restaurant Group”, “we”, “us”, or “our”) respects your privacy and is committed to protecting your personal data in accordance with the Personal Data Protection Act 2012 of Singapore (“PDPA”).

This Personal Data Protection Notice (“PDPA Notice”) explains how we collect, use, disclose, and protect your personal data when you sign up for or participate in our shared membership and loyalty ecosystem across participating WHITE Restaurant and Souper Tang Singapore outlets (“Membership Programme”), or when you interact with us through our outlets and systems.

By signing up for or using our Membership Programme, you acknowledge that you have read and understood this PDPA Notice.

1. What Personal Data We Collect

We may collect personal data that you voluntarily provide to us, as well as data generated through your interactions with us, including:

- Identity data (e.g. name, date of birth)
- Contact data (e.g. mobile number, email address)
- Transaction data (e.g. dining history, spending, points, rewards, vouchers, coupons)
- Preference data (e.g. marketing preferences)
- We generally do not collect NRIC/FIN numbers unless required by law.
- Withdrawal will not affect our right to retain or use personal data where required or authorised under applicable laws.

2. How We Collect Your Personal Data

Your personal data may be collected:

- Directly from you when you sign up as a member or transact with us
- Automatically through our ordering, membership, or point-of-sale systems
- Through service providers acting on our behalf (e.g. CRM or POS vendors)

3. Purposes of Collection, Use and Disclosure

We collect, use, and disclose your personal data for the following purposes:

a. Core Membership & Service Purposes

- Creating and managing your membership account
- Processing of orders, transactions and verifying purchases and/or payments
- Awarding, tracking, and redeeming points, rewards and coupons

Participating brands:

- Managing reservations, queues, and service requests
- Providing customer support and responding to enquiries
- Administering shared membership benefits, rewards, points accumulation and redemption across participating brands under the Membership Programme

b. Service Communications

- Sending service-related messages such as login verification, transaction confirmations, or account updates. **These do not constitute marketing advertisements.**

c. Marketing Communications (Strict Opt-In)

- Only if you have explicitly consented (by ticking the box or providing written consent), we will use your mobile number to send promotional offers, updates, or invitations via: SMS Messaging applications (e.g. WhatsApp), or Email,
- Unless you have given clear and unambiguous consent, we will check the Do Not Call (DNC) Registry before sending telemarketing messages.
- Marketing communications relating to participating brands under the Membership Programme may be sent where consent has been provided.
- You may withdraw your marketing consent at any time.

d. Legal & Operational Purposes

- Complying with applicable laws and regulations
- Preventing fraud, misuse, or security incidents
- Conducting internal audits and business operations reasonably related to the above purposes

We take reasonable steps to ensure that personal data collected is accurate and complete before using or disclosing it for business or decision-making purposes.

4. Disclosure and Sharing of Personal Data

We do not sell, rent, or trade your personal data.

We may disclose your personal data only where necessary to:

- Service providers (e.g. CRM, POS, IT or system vendors) who process data strictly on our instructions
- Shared CRM and POS systems may process membership, transaction, and rewards data across participating brands under the Membership Programme.
- Our platform is technically supported by AMFUTURE POS (Software-as-a-Service-Provider). AMFUTURE POS acts as our Data Processor, processing your data solely on our behalf to provide membership services, order management, and data analysis. We

Participating brands:

have entered into a contract with AMFUTURE POS requiring them to maintain strict confidentiality and security protection of your personal data.

- Payment service providers to process transactions.
- Your payment data is processed by Allinpay or other regulated payment gateways. We only share necessary transaction information (e.g., Order ID, Amount) with them. We do not store your full credit card information.
- Delivery or logistics partners where delivery services are requested in order to fulfill the delivery.
- Regulatory or government authorities, where required by law

All service providers are contractually required to protect your personal data and use it only for the purposes instructed by us.

5. Use of Service Providers

We may engage third-party service providers (including technology vendors) to support our Membership Programme.

Such providers:

- Act only as data processors
- Do not own your personal data
- Are not permitted to use your data for their own purposes
- Are required to implement reasonable security safeguards

6. Retention of Personal Data

We retain your personal data only for as long as necessary to fulfil the purposes for which it was collected, or as required by law (e.g. tax and accounting requirements). Transaction records may be retained for up to 5 years to comply with accounting and tax laws.

Upon termination or cancellation of your membership:

If you apply to cancel your account (in accordance with the process described in the “Membership Terms of Use” (e.g., via official membership service email, membership sign-up page), we will cease to retain your personal data or anonymise the data in a way that it can no longer be associated with you, unless retention is required for legal or business audits.

7. Overseas Transfers

Where your personal data is transferred or stored outside Singapore (e.g., Cloud hosting services), we will take reasonable steps to ensure that the recipient provides a standard of protection comparable to that required under the Singapore PDPA.

8. Your Rights Under the PDPA

You have the right to:

- Request access to your personal data
- Request correction of inaccurate or incomplete data
- Withdraw consent for the collection, use, or disclosure of your personal data

To exercise this right, please contact our Data Protection Officer (DPO) via the contact details below.

Please note that withdrawing consent for core membership services may result in our inability to continue providing membership benefits, rewards, or related services to you. If you wish to exercise the rights mentioned above regarding access, correction, or withdrawal of consent, please contact us.

Account Cancellation: As stated in the “Membership Terms of Use”, please contact official membership service email to proceed with account cancellation. Note: Withdrawing consent for core services may result in our inability to provide membership benefits or process future orders for you.

9. Security of Your Personal Data

We implement reasonable administrative, physical, and technical safeguards to protect your personal data against unauthorised access, use, disclosure, alteration, or loss, including data encryption, access control, and regular security audits.

However, no method of transmission over the Internet or electronic storage is completely secure.

In the event of a notifiable data breach that is likely to result in significant harm or affects 500 or more individuals, we will notify the Personal Data Protection Commission and affected individuals as required under the PDPA.

10. Updates to This PDPA Notice

We may update this PDPA Notice from time to time to reflect changes in our practices or legal requirements.

The updated version will be made available through our official channels.

Your continued participation in our Membership Programme constitutes your acknowledgement of such updates.

11. Contact Us

If you have any questions, requests, or concerns regarding your personal data or this PDPA Notice, please contact our Data Protection Officer (DPO):

Email: friends@whiterestaurant.com.sg

Company: White Beehoon Restaurant Pte Ltd