



COCA Personal Data Protection Policy

Your privacy is important to us. This COCA Personal Data Protection Policy sets out how COCA comply with the provisions of the Personal Data Protection Act 2012 of Singapore (“PDPA”).

We also want you to understand the way in which we collect, use, disclose and/ or retain your Personal Data. This Personal Data Protection Policy sets out:

- a. our policies on how we manage your Personal Data;
- b. the types of Personal Data we collect, use, disclose and/ or retain;
- c. how we collect, use, disclose and/ or retain your Personal Data; and
- d. the purpose(s) for which we collect, use, disclose and/ or retain your Personal Data.

You agree and consent to us to collect, use and disclose and/ or retain your Personal Data in the manner set forth in this Personal Data Protection Policy.

This Personal Data Protection Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/ or retention of your Personal Data.

From time to time, we may update this Personal Data Protection Policy to ensure that our Policy is consistent with developments and trends in the Labour Movement and/ or any regulatory changes. Should any revision(s) be made to this Personal Data Protection Policy, updates will be published on our public site. Subject to your legal rights in Singapore, the prevailing terms of the Personal Data Protection Policy shall apply.

This Personal Data Protection Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions (“Terms and Conditions”). In the event of any inconsistency between the provisions of the Personal Data Protection Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail.

1. Your Personal Data

1. In this Personal Data Protection Policy, “Personal Data” refers to any data and/or information about you from which you can be identified by, either (a) from that data; or (b) from that data and other information to which we may have legitimate access to. Examples of such Personal Data include but are not limited to:
 - a. your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to you which you have provided in any forms you may have submitted to use, or in other forms of interaction with you;
 - b. your photos;
 - c. your employment history, education background, and income levels;
 - d. Personal Data of your family members, such as next of kin, spouses, and children;
 - e. information relating to payments, such as your bank account number or credit card information;
 - f. information about your usage of and interaction with our website and/ or services including computer and connection information, device capability, bandwidth, statistics on page views and traffic to and from our website

2. Collection of your Personal Data

1. Generally, we may collect your Personal Data through the following ways:
 - a. when you sign up with us for COCA Loyalty Program;
 - b. when you interact with any of our employees and staff;
 - c. when you submit an application to us for membership services and benefits;
 - d. when you respond to our request for additional Personal Data;
 - e. when you ask to be included in an email or other mailing list;
 - f. when you request that we contact you;
 - g. when you respond to our initiatives or promotions; and
 - h. when you submit your Personal Data to us for any other reason.

3. Purposes for the Collection, Use and Disclosure of Your Personal Data

1. Generally, we may collect, use, disclose and/ or retain your Personal Data for the following purposes:
 - a. to manage your COCA membership including recruitment, processing, termination and extension of your membership;
 - b. to provide you with membership benefits and services;
 - c. to assist you with your enquiries;
 - d. to process payment using your COCA membership when you dine in all participating Coca Restaurants;
 - e. to improve membership/ customer services, such as resolving complaints and handling requests and enquiries;
 - f. to conduct research, surveys and interviews;
 - g. to keep you updated on our events; and
 - h. to comply with applicable laws and regulations.

4. Marketing/ Optional Purposes

1. From time to time, we may contact you via mail, electronic mail, telephone (call or SMS-Text), facsimile or social medial platforms, to inform you about our membership benefits, services and events that we think may be of interest to you.
2. You can let us know at any time if you no longer wish to receive marketing materials (by informing us through crm@coca.com.sg) and we will remove your details from our direct marketing database.
3. Please note that we may still send you non-marketing messages such as surveys, customer-service notices and other service related notices.

5. Disclosure of your Personal Data

1. We may disclose your Personal Data to the following group of external organisation for purposes mentioned above, subjected to the requirements of applicable laws:
 - a. a company subjected to a Collective Agreement with one of our affiliates;
 - b. agents, contractors, data intermediaries or third party service providers who provide services, such as telecommunications, mailing, information technology, payment, payroll, data processing, training, market research, carding, storage and archival, to the Organisation;
 - c. external banks, financial institutions, credit card companies and their respective service providers;
 - d. our professional advisers such as our auditors;
 - e. 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 government authority;
 - f. third party reward, loyalty, privileges and co-branded programme providers;
 - g. business partners that provides any membership services and benefits; and
 - h. any other person in connection with the purposes set forth above.

6. Protection of your Personal Data

1. We maintain appropriate security safeguards and practices to protect your Personal Data unauthorised access, collection, use, disclosure, copying, modification disposal or similar risks, in accordance with applicable laws.

7. Accuracy of your Personal Data

1. We take all reasonable measures to ensure that your Personal Data remains accurate, complete and up-to-date.
2. You may also keep us informed when there are any updates to your Personal Data by contacting us directly.

8. Withdrawal of Consent

1. If you wish to withdraw your consent to any use or disclosure of your Personal Data as set out in this Personal Data Protection Policy, you may contact us via crm@coca.com.sg.
2. Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may no longer be in a position to continue to provide membership benefits and services to you.
3. Such a withdrawal may therefore result in the termination of any membership that you may have with us.

9. Access and Correction of your Personal Data

1. You may request access to or make corrections to your Personal Data records, but COCA reserves the right to charge a reasonable fee for processing your request.
2. Please submit your request to us through the following platforms:
 - a. Visit any COCA restaurant outlets
 - b. Write to our marketing department: crm@coca.com.sg

10. Contacting Us

1. If you have any questions or complaints relating to the use or disclosure of your Personal Data, or if you wish to know more about our data protection policies and practices, please contact our marketing department via email at crm@coca.com.sg.