



DATA PROTECTION POLICY

1. Introduction

Blacklight collects information to understand your needs better. This helps us to improve our services and the way we communicate with you. We know that privacy is important to you and we strive to be as open and transparent as possible in how we serve you.

We conduct our business in compliance with the Personal Data Protection Act (PDPA) and have implemented measures to protect your personal information. Blacklight's Data Protection Policy aims to help you understand how we collect, use, share and protect your personal information.

2. Ways we collect your personal information

We may collect your personal information when you:

- Subscribe to our services
- Use our managed services and/or other Blacklight products or services
- Register for a specific product or service (e.g. registering your interest to access a demo)
- Sign up for alerts or newsletters
- Contact us with a question or request for assistance
- Participate in a competition, lucky draw or survey
- Others

3. The information we collect

The information we collect depends on the Singtel products and services you use and subscribe to. Here are key examples:

- Your identity – This may include name, address, telephone number, e-mail address, etc that you may have submitted, as well as service-related information such as bank and credit card details, device ID and IP address.
- Your interaction with us – For example, a note or recording of a call you make to one of our contact centres, an email or letter you send to us or other records of any contact you have with us.
- Your account information – For example, the subscription services you use or other details related to your account.
- Information on your use of our services – For example, the phone numbers you call or send text messages to and vice versa, as well as the date, time and duration of your calls through our network
- Your preferences – This is based on what you share with us on how you would like to be contacted, and your preferred products, services and lifestyle activities for example.
- Information from other organisations – These organisations include fraud-prevention agencies, business directories, credit reference agencies or individuals we believe you have authorised to provide your personal details on your behalf.

4. How we use your information

We may use your information for:

- Provisioning & administration of services
- Market research & service enhancement
- Sharing of rewards and benefits
- Security and risk management
- Legal & regulatory requirements

We will not use your personal data for purposes other than what we have informed you, or which are permitted under local laws and regulations.



We will not offer, publish or share your personal data with third parties outside of Blacklight for commercial purposes, without seeking your explicit permission.

We will retain your information for only as long as there is a business or legal need.

5. General information

We may amend or modify this Policy from time to time, such as in response to changes to legislation. We remain committed to safeguarding your information and being open about our data protection practices.

This Policy is to be read together with our General Terms and Conditions of Services and applies to all products and services provided by Blacklight.

Please note that different or separate data protection policies may apply to specific products and services provided by Blacklight. Please refer to the terms of use for specific products and services for more information.



ANTI-BRIBERY POLICY

6. Introduction

- 6.1. Blacklight Solutions Pte Ltd (“Blacklight”) values its reputation and is committed to maintaining the highest level of ethical standards in the conduct of its business affairs. The actions and conduct of the organisation’s staff as well as others acting on the organisation’s behalf are key to maintaining these standards.
- 6.2. The purpose of this document is to set out the organisation’s policy in relation to bribery and corruption. The policy applies strictly to all employees, partners, agents, consultants, contractors and to any other people or bodies associated with Blacklight within all offices, areas and functions.

7. Understanding and recognising bribery and corruption

- 7.1. Acts of bribery or corruption are designed to influence an individual in the performance of their duty and incline them to act in a way that a reasonable person would consider to be dishonest under the circumstances.
- 7.2. Bribery can be defined as offering, promising or giving a financial (or other) advantage to another person with the intention of inducing that person to act or to reward them for having acted in a way which a reasonable person would consider improper under the circumstances. Corruption is any form of abuse of entrusted power for private gain and may include, but is not limited to, bribery.
- 7.3. Bribes are not always a matter of handing over cash. Gifts, hospitality and entertainment can be bribes if they are intended to influence a decision. For high-risk areas, consider some of the following points:
 - How do other international companies in the same area operate? Can they recommend particular individuals or groups to work with?
 - The relationship with the local or national government. Do you have direct lines of communication with trustworthy officials, and do your operations comply with your company's anti-money laundering and anti-bribery policies?
 - Engage with local labour groups and NGOs. Establish relationships with groups on the ground who can advise on good practices and provide local knowledge.

8. Penalties

- 8.1. The Bribery Act 2010 came into force on 1st July 2011. Under that Act, bribery by individuals is punishable by up to 10 years imprisonment and/ or an unlimited fine. If the organisation is found to have taken part in bribery or is found to lack adequate procedures to prevent bribery, it too could face an unlimited fine.
- 8.2. A conviction for a bribery or corruption related offence would have severe reputational and/or financial consequences for the organisation. The words “include” or “including” shall be deemed to be followed by “without limitation” or “but not limited to” whether or not they are followed by such phrases or words of like import, and “otherwise” shall not be construed as limited by words with which it is associated.

9. Policy

- 9.1. Blacklight will not tolerate bribery or corruption in any form.
- 9.2. The organisation prohibits the offering, giving, solicitation or acceptance of any bribe or corrupt inducement, whether in cash or in any other form:



- To or from any person or company wherever located, whether a public official or public body, or a private person or company
- By any individual employee, partner, agent, consultant, contractor or other person or body acting on the organisation's behalf
- In order to gain any commercial, contractual or regulatory advantage for the practice in any way which is unethical or to gain any personal advantage, pecuniary or otherwise, for the individual or anyone connected with the individual

9.3. This policy is not intended to prohibit the following practices provided they are appropriate, proportionate and are properly recorded:

- Normal hospitality
- Fast tracking a process which is available to all on the payment of a fee; and/or
- Providing resources to assist a person or body to make a decision more efficiently, provided that it is for this purpose only

9.4. It may not always be a simple matter to determine whether a possible course of action is appropriate. If you are in any doubt as to whether a possible act might be in breach of this policy or the law, the matter should be referred to a company Director.

9.5. The organisation will investigate thoroughly any actual or suspected breach of this policy, or the spirit of this policy. Employees and contractors found to be in breach of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

10. Key risk areas

10.1. Bribery can be a risk in many areas of the organisation. Below are the key areas you should be aware of in particular:

- Excessive gifts, entertainment and hospitality can be used to exert improper influence on decision makers. Gifts, entertainment and hospitality are acceptable provided they are within reasonable limits and are authorised by a director. Any gift or hospitality, either given or received, over the value of \$50 per person should be reported.
- Facilitation payments are used by businesses or individuals to secure or expedite the performance of a routine or necessary action to which the payer has an entitlement as of right. The practice will not tolerate or excuse such payments being made.
- Reciprocal agreements or any other form of 'quid pro quo' are never acceptable unless they are legitimate business arrangements which are properly documented and approved by a director. Improper payments to obtain new business, retain existing business or secure any improper advantage should never be accepted or made.
- Actions by third parties for which the practice may be held responsible can include actions by a range of people, e.g. agents, contractors and consultants, acting on the practice's behalf. Appropriate due diligence should be undertaken before a third party is engaged. Third parties should only be engaged where there is a clear business rationale for doing so, with an appropriate contract. Any payments to third parties should be properly authorised and recorded.
- Record keeping can be exploited to conceal bribes or corrupt practices. We must ensure that we have robust controls in place so that our records are accurate and transparent. The Administration Manager is responsible for all record keeping.



11. Employee responsibility and how to raise a concern

11.1. The prevention, detection and reporting of bribery or corruption are the responsibility of all employees, contractors and partners of the practice. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you have a duty to report this to a Director and/or the Administration Manager without delay.