

LUMINE SINGAPORE PRIVACY POLICY

This Privacy Policy (this "**Policy**") applies to collection, use and disclosure of Personal Data (hereinafter defined) by LUMINE SINGAPORE Pte. Ltd. ("**LUMINE SINGAPORE**", "**we**", "**us**", or "**our**").

1. General

Protecting your privacy and the confidentiality of your Personal Data is very important to us at LUMINE SINGAPORE. This Privacy Policy explains why we collect Personal Data and how we collect, use, disclose, store and protect your Personal Data. It also assists you in making an informed decision before providing us with any of your Personal Data.

For the purpose of this Policy, in line with the provisions under the Personal Data Protection Act 2012 (the "**PDPA**"), the term "**Personal Data**" refers to data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access. Personal Data includes your name, address, telephone number, email address, date of birth, gender, photographs, personal images, device ID, operating system or version, information about your purchases or preferences, and any other information collected by us where you are identified or identifiable.

2. Collection, Use and Disclosure of Personal Data

We generally do not collect your Personal Data unless (a) it is provided to us 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 Personal 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).

We may collect Personal Data from you through various means, including but not limited to instances when you:

- Provide your Personal Data through our store and/or site for the purpose of registering for and creating an account and/or workshops;
- Apply for an account and/or membership with our Membership Program;
- Request for a product or services information or to receive any marketing, promotional or other types of communications;
- Make purchases through our retail store; or
- Make enquiries or comments through our Customer Department, social media platforms, and/or via email means.

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

LUMINE SINGAPORE will/may collect, use, disclose and/or process your Personal Data for one or more of the following purposes:

(1) For Membership:

- (a) registering you as a customer of LUMINE SINGAPORE and/or to deal with, process and/or administer the account and/or membership that you may open with us, including to facilitate your transactions or activities with us at our retail stores and/or our website;
- (b) administering, facilitating, processing and/or dealing with your relationship with us, any transactions or activities carried out by you at our at our retail stores and/or our website. This includes processing your application, orders and payment transactions; implementing transactions and the supply of products and/or services to you that you have requested;
- (c) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf including responding to your customer service enquiries and complaints; or responding to or dealing with your interactions with us;

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- (d) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your use of the website, your relationship with us, and/or any transactions made by you with us. You acknowledge and agree that such communication by us could be by way of the mailing of correspondence, documents or notices to you, which could involve disclosure of certain Personal Data about you to bring about delivery of the same as well as on the external cover of envelopes/mail packages or electronic mails;
- (e) providing services to you as our account holder, as our customer, as a member of our membership program(s) or when requested by you; dealing with or administering your participation in contests, promotions and social events organized by us;
- (f) preventing or investigating any fraud, unlawful activity or omission or misconduct, whether or not there is any suspicion of the aforementioned; dealing with and/or investigating complaints;
- (g) marketing purpose and in this regard, we would be providing you with marketing, advertising and promotional information, materials and/or documents relating to products, contests, services and/or events (including those of third party organizations whom LUMINE SINGAPORE may collaborate with) that LUMINE SINGAPORE (including its affiliates/related corporations) or such third party organizations may be selling, marketing, offering, organizing, involved in or promoting, whether such products, services and/or events exist now or are created in the future, as follows:

- (i) **Marketing communications via non-DNC modes:**

By way of postal mail, electronic transmission to your email address(es), or other technologies on your computers, and/or through other modes of communication that are not subject to the Do Not Call provisions under the PDPA (the “**Non-DNC Modes**”). By applying for, accepting or otherwise agreeing to this Privacy Policy, you acknowledge and agree that you have consented to receive marketing communications via the Non-DNC Modes described in this sub-paragraph (i), to the extent permitted under the PDPA. You may opt out of receiving such marketing communications or withdraw your consent at any time by using the unsubscribe mechanism provided in such communications or by sending an email to our Data Protection Officer at the contact details provided below, and such withdrawal will be processed in accordance with the PDPA; and/or

Marketing communications via DNC modes:

With your clear and unambiguous consent, we may use your telephone number to send you marketing and promotional messages relating to our products and services via SMS, WhatsApp, voice calls or other similar messaging platforms. You may withdraw your consent at any time by contacting us at our DPO's email address below or by using the opt-out mechanism provided in our marketing messages. Upon withdrawal, we will cease sending you marketing communications within a reasonable time in accordance with applicable law.

(2) For Employees:

- (h) evaluating, processing, administering and/or dealing in any recruit or employment related activities; and/or
- (i) performing other obligations in the course of or in connection with our employment and/or our provision of services requested by a data subject;

(3) General:

- (j) conducting research (including customer research), surveys, market surveys, analysis and/or development activities (including but not limited to data analytics, surveys and/or profiling) to improve our services and facilities, or to improve our understanding of your interests, concerns and preferences, in order to enhance any continued interaction between yourself and us connected or in relation to the website, and/or improve any of our products or services. Without limiting the generality of the foregoing, we may/will in this regard send you surveys or request a face to face interview survey, by way of email or postal mail;

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- (k) storing, hosting, backing up (whether for disaster recovery or otherwise) of your Personal Data, whether within or outside Singapore;
- (l) implementing and maintaining our information technology systems, including to store and process Personal Data in computer databases and servers located within and outside Singapore;
- (m) anonymizing your Personal Data;
- (n) complying with any applicable laws, regulations, codes of practice, guidelines or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority; and/or
- (o) transmitting to any third parties including our affiliates, data intermediaries, third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, such as Japan and the United States for the aforementioned purposes.

4. Provision of Third-Party Personal Data by You

Should you provide LUMINE SINGAPORE with Personal Data of individual(s) other than yourself, you represent and warrant to LUMINE SINGAPORE and you hereby confirm that:

- (a) prior to disclosing such Personal Data to us, you have obtained consent from the individual(s) whose Personal Data is/are being disclosed to us, to:
 - (i) permit you to disclose the individual(s)'s Personal Data to LUMINE SINGAPORE for the Purposes; and
 - (ii) permit LUMINE SINGAPORE to collect, use, disclose and/or process the individual(s)'s Personal Data for the Purposes, as set out above;
- (b) any Personal Data of individual(s) that you disclose to us is/are accurate; and
- (c) you are validly acting on behalf of such individual(s) and that you have the authority of such individuals to provide their Personal Data to LUMINE SINGAPORE and for LUMINE SINGAPORE to collect, use, disclose and process such Personal Data for the purposes set out in this Policy.

5. Withdrawing Your Consent

The consent that you provide for the collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw 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 at the contact details provided below.

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 it.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose your Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws.

6. Access to and Correction of Personal Data

If you wish to make (a) an access request for access to your Personal Data which we hold 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, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.

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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.

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, 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).

7. Protection of Personal Data

We aim to treat your Personal Data with the care and diligence. To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we, to the extent required by the PDPA, have introduced appropriate administrative, physical and technical measures such as minimised collection of personal data, up-to-date antivirus protection, and authentication and access controls (such as good password practices, need-to-know basis for data disclosure, etc.).

You should be aware, however, that 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 information and are constantly reviewing and enhancing our information security measures.

8. Accuracy of Personal Data

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 in writing or via email at the contact details provided below.

9. Retention of Personal Data

We may retain your Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

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.

10. Transfer of Personal Data Outside Singapore

We may transfer and disclose your Personal Data to our head quarter in Japan, for the purposes listed in clause 3 above, in accordance with the PPDA.

If we transfer your Personal Data to additional third party which is sited outside Singapore, including but not limited to data intermediaries, third party service providers and agents, we will obtain your consent for the transfer to be made and 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.

11. Reporting A Personal Data Breach

If we encounter suspected Personal Data Breach (defined below), we will conduct an assessment of whether the Personal Data Breach is a notifiable Personal Data Breach (hereinafter defined). “**Personal Data Breach**” shall mean (a) the unauthorised access, collection, use, disclosure, copying, modification or disposal of Personal Data; or (b) the loss of any storage medium or device on which Personal Data is stored in circumstances where the unauthorised access, collection, use, disclosure, copying, modification or disposal of the personal data is likely to occur.

We will notify the Personal Data Protection Commission, as soon as practicable, but in any case, no later than three (3) calendar days after the day we make that assessment, if the Personal Data Breach:

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- (a) results in, or is likely to result in, significant harm to an affected individual; or
- (b) is, or is likely to be, of a significant scale ("**notifiable Personal Data Breach**").

We will also notify you if you are affected by a notifiable Personal Data Breach mentioned above in any manner that is reasonable in the circumstances.

12. Data Protection Officer

If you have any enquiries or wish to make any request relating to your Personal Data, you may contact our Data Protection Officer at:

Department: Administrator of LUMINE SINGAPORE Pte. Ltd.

Email: administrator@lumine-sg.com

Weekdays: Monday-Friday 10AM-5PM

13. Changes of this Policy

We may revise this Policy from time to time without any prior notice. Any amended Policy will be informed to you accordingly.

Effective date: 1/4/2026

Last updated: 1/4/2026