



QI MANTRA PTE LTD Customer Privacy Policy

This QI MANTRA PTE LTD (hereinafter called “Qi Mantra Pte Ltd”) Customer Privacy Policy (“Privacy Policy”) discloses how “Qi Mantra Pte Ltd”, “us” or “we” collects, stores and handles the Personal Data of its customers at QI MANTRA, users of Qi Mantra Pte Ltd’s mobile services, and visitors to the www.qimantra.com website.

Please read the following Privacy Policy to understand how QI MANTRA uses the Personal Data we may collect from you.

By providing your Personal Data to us, you are consenting to this Privacy Policy and the collection, use, access, transfer, storage and processing of your personal information as described in this Policy.

1. Our Commitment to Protect Your Privacy

At Qi Mantra Pte Ltd, we are committed to protecting your personal and data privacy. To ensure that you can make informed decisions and feel confident about supplying your Personal Data (as defined below) to us when using our website, mobile and other services, we provide this notice outlining our practices and the choices you have concerning how your Personal Data is being collected and used by us.

2. The Personal Data We Collect

We request information from you in several areas of our website, mobile services and other channels including in-store, that may be used to personally identify you (“Personal Data”), including but not limited to:

- a. Your personal information such as your name, gender, date of birth, passport or other personally identifiable number and information about your registered status with any of our subsidiaries, associated companies and/or business associates;
- b. Your contact information such as your telephone numbers, mailing addresses, email addresses, and fax numbers;
- c. Your credit or debit card information and billing information, including name of cardholder, card number, billing address and expiry date;
- d. Your business information such as company name, business title and associated contact information;
- e. Your responses to market surveys and contests conducted by us or on our behalf.

Certain Personal Data (particularly relating to your personal information, contact information and past medical history) are required for specific services and if you fail to supply such Personal Data as requested from each specific service, we may be unable to deliver you the services in full.

3. Purpose for which the Personal Data are Collected and Used

We may use the Personal Data you provided for one or more of the following purposes:

- a. For your use of the online services available at any of our websites and/or through other telecommunication channels;
- b. For the supply of any products and/or services which we may offer to you or you may require from us from time to time including text message (SMS) alerts;



- c. For marketing, promotional and customer relationship management purposes, such as sending you updates on latest offers and promotions in connection with our products and services and conducting market research;
- d. For identification and verification purposes in connection with any of the services or products that may be supplied to you;
- e. To contact you regarding your enquiries;
- f. To administer contests and sweepstakes conducted by us or on our behalf;
- g. To disclose to a third party to comply with any law, legal requirements, orders, directions or requests from any court, authority or government body of any jurisdiction, which may be within or outside of Singapore;
- h. To facilitate the payment for products and services provided by us or our subsidiaries, associated companies and/or business associates including verification of credit card details with third parties and using the Personal Data you provide to conduct matching procedures against databases of known fraudulent transactions (maintained by us or third parties).
- i. To improve our security, including in relation to the processing of payment by credit card to guard against the risk of fraud including carrying out matching procedures against databases of known fraudulent transactions (maintained by us or third parties).

We may from time to time use aggregate non-identifying information about our customers to better design our website and/or to improve our services and products. This means we may provide this information to third parties. However, this information will never identify any single user in particular.

Except as provided below, we will not knowingly or intentionally use or share the Personal Data you provide to use in ways unrelated to the aforementioned purposes without your prior consent.

4. How to Access or Correct Your Personal Data

Subjected to the exception provided under Singapore law, you can obtain information about your Personal Data stored by Spa Esprit Group and, may request access to any Personal Data stored about you and request for correction, updating, deletion or disabling of your Personal Data at any time. If you wish to obtain a copy of any of your Personal Data, or if you believe that the Personal Data relating to you which we collect and maintain is inaccurate, incomplete or ceased to be true, or if you believe that the Personal Data held by us was used beyond the scope of the purpose of use disclosed above or was acquired by fraudulent or unlawful means or provided to a third party without your prior consent, please write to us at the address below.

Any queries, complaints, objections or request for access or correction to, or deletion of Personal Data or for information regarding policies and practices and kinds of Personal Data held by us, or should you wish to limit the processing of your Personal Data, or to withdraw any voluntary consent provided by you, must be in writing and sent to us via postal mail at the following address.

Customer Care
Spa Esprit Group Pte Ltd
60 Jalan Penjara
Singapore 149375



5. Use of Cookies on Spa Esprit Group Sites

A cookie is an alphanumeric string of identifier that websites of the Spa Esprit Group, including: www.qimantra.com, use to transfer to the cookie file of the browser on your computer's hard disk.

With the use of cookies, we can better serve you and/or maintain your information across multiple pages within or across one or more sessions. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in future.

Two types of cookies are used on the Sites:

Session Cookies, which are temporary cookies that remain in the cookie file of your browser until you leave the site.

Persistent Cookies, which remain in the cookies file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). Cookies cannot be used by themselves to identify you.

6. Links to Other Sites

This website contains links to other sites that are operated by third party companies with different privacy practices. You should remain alert when you leave our site and read the privacy statements of other websites. We have no control over Personal Data that you submit to or receive from these third parties.

7. Our Commitment to Personal Data Security

To maintain the accuracy of the Personal Data, as well as to prevent unauthorised access and ensure the correct use of Personal Data, we have implemented appropriate physical, technical, and administrative measures to safeguard and secure the Personal Data we collect.

For example, we use Secure Socket Layer (SSL) protocol—an industry standard for encryption over the Internet— to protect in transmission the Personal Data we collect online. When you type in sensitive information such as credit card details, it will be automatically converted into codes before being securely dispatched over the Internet. All electronic Personal Data that we maintain is securely stored and further protected through our use of appropriate access controls. When disposing of Personal Data, paper documents containing Personal Data are securely destroyed, and electronic files storing Personal Data are permanently deleted.

As stated above, in some instances we may entrust Personal Data to third party service providers (including service providers outside of your jurisdiction), binding them to protect the security of Personal Data and only to use it for the purposes we specify.

8. Disclosure and Transfer of Personal Data

Qi Mantra Pte Ltd is a member of the Spa Esprit Group, a global beauty, food and beverage company with operations, offices, affiliates and business partners located worldwide. As such, the Personal Data you submit to us in one country may be transferred, used, processed, stored and accessed worldwide in one or more additional countries, as described in this Privacy Policy.

In addition, we may disclose and transfer Personal Data to and jointly use Personal Data with (whether within or outside of your jurisdiction) our subsidiaries, associated companies, business associates, service providers, and other persons who we consider appropriate, in connection with the services and products provided to or requested by you. We may disclose this information to facilitate communication of news and information about



such services and products and otherwise for the purposes mentioned above, under Section 3, "Purposes for which the Personal Data are Collected and Used."

The entities with whom we may share your Personal Data include but are not limited to:

- I. Qi Mantra Pte Ltd and the Spa Esprit Group Pte Ltd and its subsidiaries and related companies;
- II. Any agent, contractor or third party service provider who provides administrative, marketing and research, distribution, data processing, telemarketing, telecommunications, computer, payment or other services to Qi Mantra Pte Ltd in connection with the operation of its business;
- III. Other business associates such as loyalty program operators and other companies involved in providing customer service or fulfilling customer requests;
- IV. Credit reference agencies;
- V. Credit, debit and /or charge card companies and/or banks;
- VI. Government or non-government authorities, agencies and/or regulators;
- VII. Medical professionals, insurers and clinics/hospitals.

Where permitted by applicable local law, we may also disclose your Personal Data to third parties: (i) when required by law, by court order, or in response to a search warrant or other legally valid inquiry; (ii) to an investigative body; (iii) to enforce our agreements with you; (iv) when requested by other government or law enforcement authorities; (v) with your express consent, or, (vi) pursuant to our good faith belief that disclosure is required by law or otherwise necessary to the establishment of legal claims or defenses, to obtain legal advice, to exercise and defend our legal rights, to protect our rights or property and those of our subsidiaries or associated companies, or to protect the life, body or property of an individual. This also applies when we have reason to believe that disclosing the Personal Data is necessary to identify, contact or bring legal action against someone who may be causing interference with our rights or properties, whether intentionally or otherwise, or when anyone else could be harmed by such activities.

We may also transfer any information we have about you as an asset in connection with a merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Qi Mantra Pte Ltd or as part of a corporate reorganization or stock sale or other change in corporate control.

Please be advised that the Personal Data that Qi Mantra Pte Ltd collects or obtains may be transferred to jurisdictions that offer lesser protection of Personal Data than that provided in your jurisdiction. By submitting personal information to Qi Mantra Pte Ltd or using any Qi Mantra Pte Ltd website, you understand and consent to such transfer.

9. Changes to Privacy Policy

We will post on our website at www.qimantra.com any changes to this policy with the effective date of the changed policy, so that you can be informed of the way we collect and use your Personal Data any time you so choose. If at any point we decide to use the Personal Data you submitted under this current policy in a way that



differs materially from the privacy policy that applied at the time of that submission, you will be notified and given the opportunity via the website, email or in writing to opt out or otherwise prevent such usage.

10. Your Choice

Occasionally, we may use your personal data (including your name and contact details) to send you marketing communications such as emails containing news, offers, promotions and joint marketing offers. However, we will first obtain your consent before doing so. Please see below on how to provide us with your consent.

We may also provide your personal data (including your name and contact details) to third parties including our marketing partners, travel service partners for the purpose of marketing their products and services to you. Again, we will only do this if you provide us with your consent.

You may indicate your consent to the above by the following ways:

- a. when providing us with your personal data through our website or a form, ticking boxes indicating your consent;
- b. when providing us with your personal data through the telephone, tell our customer representative that you consent; or

You may opt-out from receiving marketing communications at any time, free of charge, by:

- a. following the opt-out instructions contained in the communications;
- b. writing to us at the address listed above; or
- c. updating your email subscriptions by sending us an email feedback@qimantra.com

Any personal data provided to or gathered by Qi Mantra Pte Ltd is controlled primarily by Qi Mantra Pte Ltd and /or Spa Esprit Group Pte Ltd.

11. Retention of Data

All Personal Data that has been collected from you will only be stored for a limited duration that is relevant to the purpose for which it was processed and for as long as required by applicable law.

This notice is written in English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

If you have any questions with regards to our privacy policy, please contact us at

Data Protection Officer
60 Jalan Penjara
Singapore 149375
Contact No.: +65 6474 5964
Email Address: dpo@spa-esprit.com

SPA ESPRIT GROUP