

## LifeSG Privacy Statement

This LifeSG Privacy Statement (the "**Privacy Statement**") must be read in conjunction with the LifeSG Terms of Use (the "**Terms**"). Unless otherwise stated, all other capitalised terms contained in this Privacy Statement shall have the meaning given to it in the Terms. In this Privacy Statement, "we", "us" or "our" refers collectively to the Government of Singapore and Government Technology Agency.

- 1. The purpose of this Privacy Statement is to inform you of how we collect, use, disclose and process data and personal data relating to you, or that may relate to a third party individual and is provided by you (collectively, "Data"). Please read this Privacy Statement carefully.**

### Types of Data that we collect

- 2.** We may request certain types of Data from you in connection with your Use of LifeSG and LifeSG Materials. Examples of the types of Data which we may request and collect include, but are not limited to:
  - 2.1** information relating to your Account, such as your Account number;
  - 2.2** information about you from data source(s), such as Singpass, approved by us;
  - 2.3** your contact information, including your telephone number, email and mailing addresses from Singpass;
  - 2.4** information from your Device including but not limited to your location information, IP address, MAC address, network interfaces, device type and model, and other forms of data from your Device in connection with the Use of LifeSG or LifeSG Materials;
  - 2.5** information relating to the version of LifeSG Mobile on your Device or your Use of LifeSG or LifeSG Materials, including but not limited to information relating to the usage of the various functionalities, features or clicks on the LifeSG Materials as well as Device permissions such as the permission to push notifications, use location services, use any connectivity services, and other similar information;
  - 2.6** Fingerprint, Face Identification enrolled by, where applicable, the relevant Fingerprint Recognition Feature or Face Recognition Feature on your Registered Mobile Device;
  - 2.7** your Captured Face Data;
  - 2.8** your Login Credentials for Using LifeSG and LifeSG Materials; and
  - 2.9** such other information as may be provided by, or collected from you in connection with your Use of LifeSG and LifeSG Materials.
- 3.** We may collect the Data and other types of information relating to your activities in respect of **LifeSG** and **LifeSG** Materials through various technologies including but not limited to:

- 3.1 Analytics Tags:** Analytics Tags are used by us to analyse the effectiveness of the functionalities and features of LifeSG and LifeSG Materials and user preferences relating to LifeSG and LifeSG Materials in order to improve general user experience. We may use information collected through such analytics tags in combination with your Data (such as transaction history and demographic information) to understand more about the profile of our users.
- 3.2 Cookies:** Cookies are small data files which are sent to your browser or Device to store and track information about you when you Use LifeSG and LifeSG Materials. Cookies are also used to improve and maintain the functionality of LifeSG and LifeSG Materials, and to track information such as the number of users of LifeSG and LifeSG Materials, their frequency of use, the profile of the users and other similar information relating to the Use of LifeSG and LifeSG Materials. While these cookies can tell us when you Use LifeSG and LifeSG Materials, they cannot read data off your hard disk. Not all cookies collect personal data and you may configure your preferences and settings to reject the use of cookies. However, this may mean you may not be able to take full advantage of LifeSG and LifeSG Materials, including the features or the functionalities of LifeSG or LifeSG Materials.
- 3.3 Server Logs:** Server logs are files and records of activity created by the Device that you Use LifeSG or LifeSG Materials from. For example, a web server log may record a history of page requests whereas other logs may record errors, access attempts or other information about your Device, such as your IP address or your Device's cookie settings. We collect and retain such server logs for administrative, security and troubleshooting purposes.
- 3.4 Device information:** Information relating to your Device such as its model, type, operating system and other technical attributes.

#### Why we collect Data

- 4.** Data requested and collected from you may be used, disclosed and processed by us for any, some or all of the following purposes:
  - 4.1** to assist, process and facilitate your Use of LifeSG and LifeSG Materials, including registering and creating your Account, facilitating your login into your Account and your use of any features or functionalities of LifeSG and LifeSG Materials (including Identiface and Myinfo);
  - 4.2** to carry out your instructions or respond to any queries, feedback or complaints provided by (or purported to be provided by) you or on your behalf, or otherwise for the purposes of responding to or dealing with your interactions with us;
  - 4.3** to monitor and track your usage of LifeSG and LifeSG Materials, in order to assist us in understanding user behaviour, trends and preferences, and in improving LifeSG and LifeSG Materials. For the avoidance of doubt, we may also collect, use, disclose and process such Data to create reports and produce statistics regarding the above for record-keeping and reporting or publication purposes (whether internally or externally). Data used in such reports and statistics will be anonymised before publication;

- 4.4 for the purposes of storing or creating backups of your Data for contingency or business continuity purposes;
- 4.5 to prevent or investigate any fraud, unlawful activity or omission or misconduct via the use of your Account, whether or not there is any suspicion of the aforementioned;
- 4.6 to deal with conflict of interests or investigate complaints in relation to your Account;
- 4.7 to authenticate your identity through the use of Identiface;
- 4.8 to populate your Profile Data for the use of Myinfo;
- 4.9 to pre-fill any e-form, user registration page or screen on any Approved Recipient's Channel(s) with your Profile Data;
- 4.10 to provide you with customised or personalised service recommendations or content in respect of your Use of LifeSG and LifeSG Materials, and to optimise our selection and recommendation algorithm;
- 4.11 to enable us to contact you or communicate with you on any matters relating to your Use of LifeSG and LifeSG Materials, including but not limited to marketing purposes and the purposes set out above, via email, push notifications or such other forms of communication that we may introduce from time to time depending on the functionality of LifeSG and LifeSG Materials and your Device; and
- 4.12 for any other purpose(s) that do not appear above where permissible under any written law, as may be notified by us to you from time to time,

(collectively, the "**Purposes**")."

5. If you provide us with Data:

- 5.1 we may share, transfer and disclose Data with Approved Service Providers and relevant third party service providers in connection with your Use of LifeSG and LifeSG Materials, unless such sharing is prohibited by written law; and
- 5.2 for your convenience, we may also display to you Data you had previously supplied us. This will speed up the transaction(s) and save you the trouble of repeating previous submissions. Should such displayed Data be out-of-date, you shall be required to supply the latest Data through the relevant functionality in LifeSG without delay.

Data of third party individuals

- 6. In the course of your Use of LifeSG or LifeSG Materials, we may collect Data relating to other individuals from you.
  - 6.1 You shall, prior to disclosing to us such Data relating to other individuals:

- (a) notify these individuals (i) that you will be providing their personal data to us; and (ii) of the Purposes for which we will be collecting, using, disclosing and processing their personal data, as set out in this Privacy Statement and as notified by us to you from time to time; and
- (b) obtain the consent from the individuals whose personal data are being disclosed, permitting (i) you to disclose the personal data to us; and (ii) us to collect, use, disclose and process these individuals' personal data, for the Purposes.

**6.2** You represent and warrant that:

- (a) the personal data that you will be providing us or have provided us is, complete, accurate, true and correct; and
- (b) you have the valid authority and consent from these individuals to act on their behalf and provide their personal data to us to collect, use, disclose and process for the Purposes.

How we handle and manage your Data

- 7. Your Data may be stored in servers, systems or devices owned, operated or managed by us, a relevant Third Party or any third party service provider engaged by us or a relevant Third Party, or on your Device, and may be used by us (or our third party service providers) and Approved Service Providers to facilitate your Use of LifeSG or LifeSG Materials.
- 8. You may withdraw your consent to the use and disclosure of Data by us with reasonable notice; however, doing so may prevent proper Use of LifeSG or LifeSG Materials, or any part thereof and may also result in the cessation of your Use of LifeSG or LifeSG Materials, or any part thereof. We may retain, use, disclose and process your Data for any of the Purposes set out herein where permitted under any applicable law.

Changes to Privacy Statement

- 9. We reserve the right to change, modify or supplement the Privacy Statement at our discretion and at any time, by posting the changed, modified or supplemented Privacy Statement on or through the LifeSG Website, LifeSG Mobile, or through such other means as we may deem appropriate. Your continued Use of LifeSG and LifeSG Materials following the posting of any change, modification or supplement will constitute your acceptance of such change, modification or supplement. If you do not agree to any change, modification or supplement to the Privacy Statement, please do not Use LifeSG or LifeSG Materials.