



# PRIVACY POLICY

This Privacy Policy explains how your personal data will be treated when any goods or services are offered to you by or on behalf of Virgin Active Singapore Pte. Ltd. (Company Registration Number 201219030N) (“**Virgin Active**”) or when you use the website “www.virginactive.com.sg” (“**website**”) or any of Virgin Active’s smart phone or social media applications.

Personal data is any data in respect of which your identity is either apparent, or can reasonably be ascertained, from the data and/or other data that we or our partners have or are likely to have access.

By providing your personal data to Virgin Active, whether you have provided such personal data through our website, over the phone, at a Virgin Active club, a smart phone or social media application, or otherwise, you agree to the collection, use and disclosure of that data in accordance with this Privacy Policy. If you do not consent to such collection, use or disclosure of your personal data, we may not be able to provide you with certain products or services.

In addition to this Privacy Policy, there may also be additional privacy provisions that apply to certain sections of the website or to specific services offered by Virgin Active. Because these additional provisions also relate to your privacy protection, you should review them wherever they are accessible to you on the website or in the terms and conditions for the service. If there is any inconsistency between this Privacy Policy and those additional privacy provisions, the additional provisions will prevail.

## 1. What is this policy about?

This policy explains the key measures we have taken to implement the requirements of the Personal Data Protection Act 2012 (“**PDPA**”). It aims to answer the questions you might have about how we collect, use and disclose your personal data. If you have any further questions about Virgin Active’s privacy practices, please contact our Personal Data Officer at [privacy@virginactive.com.sg](mailto:privacy@virginactive.com.sg) or by writing to us at #10-02, SGX Centre 1, 2 Shenton Way, Singapore 068804. Media enquiries should be made to [pr@virginactive.com.sg](mailto:pr@virginactive.com.sg).

## 2. What data have you collected about me?

We collect and hold data that you have provided to us about yourself, and information about your use of our services such as membership information and information about your use of our clubs. The information that we collect will depend on how you use the services offered by Virgin Active.

Data that you might have provided to us includes:

- data provided in applying for Virgin Active club memberships – for example, your contact details and credit card details;
- data provided as part of your use of the Virgin Active clubs – for example, the frequency with which and the times at which you use a Virgin Active club including the classes that you attend;
- data provided as part of your use of Virgin Active’s website and web services – for example, the email address you provide to participate in specific promotions and offers, information you provide about your use of our club and your fitness; and
- data relating to your health – for example, the existence and nature of a medical condition disclosed to us in completing our pre-exercise questionnaire.

## 3. What do you do with this data?

We use and disclose your personal data to provide you with membership or guest visits to a Virgin Active club, and to offer you other Virgin Active products and services. We may also use personal data for related purposes and for purposes permitted under the PDPA such as:

- maintaining our relationship with you, including responding to your questions;
- helping us to identify and inform you about other Virgin Active products or services that are likely to be of interest to you;
- internal accounting and administration, including sharing information with our related bodies corporate for reporting purposes;
- using your credit card details for billing purposes;
- photos for identification purposes and club access;
- protecting you and Virgin Active from error and fraud;

- responding to police or regulatory authority enquiries or investigations;
- preventing a serious credit infringement;
- improving the website; and
- developing a better understanding of our customers' needs.

If you do not provide us with your personal data, we may not be able to provide you with these services.

#### **4. Are there any other times when you use my personal data for any other purpose or give this information to someone else?**

Virgin Active recognises the trust you place in us when you give us your personal data. Other than disclosure to service providers (explained below) or as required by law (for example, disclosure to various Government departments or to Courts), our policy is that we do not generally give your personal data to other organisations unless you have given us your consent to do so.

We may share your personal data with certain third parties, such as: providers of the electronic systems we use to collect and store your personal data; banks and financial institutions you use to make payments to us; and other service providers we use to help us run aspects of our business efficiently. Occasionally Virgin Active might also use your personal data for other purposes or share your information with another organisation because:

- we believe it is necessary to provide you with a service which you have requested;
- we believe it is necessary to protect the rights, property or personal safety of you, other Virgin Active members or guests, or any member of the public;
- we believe it is necessary to do so to prevent or help detect fraud or serious credit infringements - for example, we may share information with credit reporting agencies, law enforcement agencies and fraud prevention units;
- for obtaining legal advice;
- we believe it is necessary to protect the interests of Virgin Active - for example, disclosure to a Court in the event of legal action to which Virgin Active is a party; or
- the assets and operations of the business are being transferred to another party as a going concern.

When we share information with other organisations and service providers as set out above, we do so in accordance with this Privacy Policy. To the extent that these organisations and service providers gain access to your personal data, they will be made subject to confidentiality obligations which prohibit them from keeping this information or using this information for any other purpose, where required by the PDPA.

#### **5. Do I have to receive marketing information from Virgin Active?**

Virgin Active will keep you up to date with our special offers, products and services, where you have consented to receive materials containing such information. Please note that you can choose not to receive marketing information from us by contacting the Virgin Active team on [privacy@virginactive.com.sg](mailto:privacy@virginactive.com.sg) or by speaking to a Receptionist at your Home Club.

#### **6. Do you use cookies and all that stuff on your website?**

Our website is designed to give you useful information about Virgin Active. We use cookies to ensure you can make online transactions securely. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. Virgin Active also uses cookies to measure our customers' interest in different parts of our website. Cookies are useful to estimate the number of visitors to our website and determine overall traffic patterns. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of Virgin Active's online services.

#### **7. How can I access the information you keep about me?**

If at any time you want to know what personal data we hold about you, or about how such personal data has been or will be used, you are welcome to request a copy of your customer record by contacting Virgin Active on [privacy@virginactive.com.sg](mailto:privacy@virginactive.com.sg). We aim to respond to most requests within 14 days, or if the request is more detailed, within 30 days. Virgin Active may recover from you its reasonable cost of supplying you with this information.

#### **8. How do I change or delete the information that you have about me?**

If at any time you wish to change personal data that is inaccurate or out of date, please contact us. If you want us to delete the data we hold about you, please let us know and we will do our best to delete it unless we need to keep it for any of the purposes identified in Items 3 or 4 of this Privacy Policy or for legal or business reasons, or as permitted and required by the PDPA.

#### **9. Is the information Virgin Active has about me secure?**

Virgin Active endeavours to take all reasonable steps to keep your personal data secure. We store this information on secure servers that are protected in access-controlled facilities. Only authorised users can access your personal data,

and access is only for approved purposes. We train our staff and require our data operators to respect the privacy and confidentiality of your information. Unfortunately, we can't give you an absolute guarantee that your information is always secure. For example, no data sent over the internet is 100% secure. While we ensure reasonable security arrangements to prevent unauthorised access, collection or use of your data, we can't be held responsible for events arising from unauthorised access to your personal data.

#### **10. What happens to my information if I enter it on a different website linked to the Virgin Active site?**

Virgin Active provides links to some other websites outside Virgin Active. These linked sites are not under our control, so we are not responsible for the conduct of companies linked to our website. Before you enter information on to those sites, you should look at their privacy policy and terms and conditions of use.

#### **11. Do you have data on people other than customers?**

Most of the personal data that Virgin Active collects relates to our members and guests. But we may also keep information about people who provide information via the website, such as by entering competitions, or applying for Virgin Active membership. This policy applies to those people as well. We also hold personal data on our employees and contractors, which are covered by separate policies.

#### **12. What if ownership of the Virgin Active business changes?**

In the unlikely event that ownership of part or all of the Virgin Active business changes, your personal data will be transferred to the new owner of the business.

#### **13. What to do if I have a problem, question or complaint?**

If you have any further queries relating to our Privacy Policy, or you have a concern, please contact the Virgin Active Personal Data Officer at [privacy@virginactive.com.sg](mailto:privacy@virginactive.com.sg). If Virgin Active becomes aware of any ongoing concerns or problems with customer information, we will take these issues seriously and work to address these concerns.

#### **14. Future changes**

From time to time, our policies will be reviewed and may be revised. Virgin Active reserves the right to change this Privacy Policy at any time and notify you by posting an updated version of the Privacy Policy on our website. Before providing us with personal data, please check this Privacy Policy on our website for any changes.

This Privacy Policy was last updated in June 2018