

Dash Data Protection Policy

Dash is a mobile money service provided by SingCash Pte Ltd (“SingCash”).

This Dash Data Protection Policy is effective from 28 May 2019. Updated on 17 Aug 2022.

Respecting your privacy and protecting your personal data

SingCash 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 (the “PDPA”) and have implemented additional measures to protect your personal information.

This Policy aims to help you understand how we collect, use, share and protect your personal information.

Ways we collect your personal information

We may collect your personal information when you:

- Register for Dash products and services or Remittance services
- Sign up for alerts or newsletters
- Contact us with a question or request for help
- Participate in any rewards and promotions or surveys
- Visit the Dash website
- Download, use and update Dash mobile applications

The information we collect

The information we collect depends on the products and services you use and register for. Here are key examples:

- **Your identity** – This includes: NRIC or FIN number, name, address, telephone number, email address, date of birth, 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 1800-GETDASH, 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 peers and merchants you pay money to and receive money from and vice versa, as well as the amount, date and time of the transactions made.
- **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 can include business partners with whom we are working with on Dash promotions (“Dash Preferred Partners”), fraud-prevention agencies, business directories, credit reference agencies or individuals we believe you have authorised to provide your personal details on your behalf.
- **Information relating to use of the Dash application** – These information facilitates our provision to you of the services through the Dash applications where necessary. For example, access to location services to find merchants around you for your payments or deals, contact information (for peer to peer services), system tools, device ID and call information for security and verification purposes, access to selected media, photos and files designated by you relating to your profile or Dash transactions, Wifi connection and network communication (including NFC) information to allow use of Dash services.

How we use your information

We may use your information for:

Provisioning & administration of services

- Process your orders and activate or deactivate services
- Enable us to process bills and payments
- Respond to enquiries and requests from you or people you have authorized
- Inform you about service upgrades, updates, advice and/or recommendations
- Provision to you of services through the Dash application

Market research, network & service enhancement

- Conduct market research and customer satisfaction surveys to improve our customer service; develop new products, as well as personalise the services we offer you
- Perform market analysisⁱ

Sharing of rewards and benefits

- Offer rewards and promotionsⁱⁱ, and share promotional benefits and loyalty programs which you may qualify for

- Determining your eligibility for rewards and promotions
- Provide updates, offers, invitations to events and deliver relevant advertising, including through voice and SMS with your prior consent or if otherwise permitted under local laws and regulations

Security and risk management

- Inform you of service and security issues
- Prevent and detect fraud or other crimes and recover debts
- Conduct internal audits
- Ensure the safety and security of our properties and systems
- Conduct checks against money laundering, terrorism financing and related risks

Legal & regulatory requirements

- Meet legal, regulatory and other requirements including providing assistance to law enforcement, judicial and other government agencies
- Conduct anti-money laundering, suppression of terrorism financing and related checks

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 the Singtel Group 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.

Sharing your information

We may share your information with:

- Companies in the Singtel Group
- Dash Preferred Partners for purposes relating to rewards and promotions
- Business partners and vendors we work with to deliver services you have registered for
- Industry regulators and other government organisations, as required by local laws and regulations
- Financial institutions for purposes related to your banking account and/or Credit/Debit card linked to the Dash products and services
- Research institutions for market analysis purposes

Your information is disclosed to above only for relevant purposes (please refer to those mentioned in this Policy) or to protect the interests of our customers.

In some cases, we encrypt, anonymise and aggregate the information before sharing it.

Anonymising means stripping the information of personally identifiable features. Aggregating means presenting the information in groups or segments, e.g. – age groups.

We will also ensure that overseas organisations we work with observe strict confidentiality and data protection obligations.

Protecting your information

We have implemented stringent measures to secure and protect your information. These include:

- Safeguards to prevent security breaches in our network and database systems
- Limits on access to information in our systems and the systems of our business partners and vendors
- Strict verification processes to prevent unauthorised access to information

Respecting your contact preferences

SCPL is committed to complying with the Do Not Call (“DNC”) provisions. We have always been mindful of engaging our customers in a more targeted and relevant way.

We may send marketing messages to your Singapore telephone number if:

- a. you have given us consent, OR
- b. you have not registered with the national DNC Registry, OR
- c. the sending of such messages is permissible under applicable laws and regulations.

Our marketing messages aim to update you about our exclusive offers, rewards programs, promotions and special deals from our preferred partners and advertisers.

If you wish to continue receiving such messages or to opt out, or withdraw your consent to our collection, use and disclosure of your personal information, you can indicate your preference at any time via the Singtel Dash Application.

Your request will be processed within 21 calendar days.

Please note that after opting out, you may still continue to receive non-marketing messages, such as product updates and service notices as permitted under applicable local laws and regulations.

Feel free to write to us through our feedback page or contact our Data Protection Officer at contactdpo@singtel.com.

You may also refer to our FAQ section for more details.

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 the various Terms and Conditions at <https://www.dash.com.sg/terms-and-conditions/> and applies to all Dash products and services provided by SCPL and Remittance services provided by SingCash under such Terms and Conditions.

Please note that different or separate data protection policies may apply to non Dash-related products and services provided by Singtel. Please refer to the terms of use for non Dash-related products and services for more information.

ⁱ Upon request from private and public organisations, we may provide information collected as described above for their planning purposes. The information included within any reports to these organisations is always aggregated and anonymised such that no particular individual is identifiable.

ⁱⁱ Details of ongoing promotions may be accessed at www.dash.com.sg/deals