

## **Kellogg Privacy Policy**

Please be informed that your personal information will be collected, used, disclosed and processed in accordance with this Privacy Policy which serves as our Personal Data Protection Notice to you.

This Privacy Policy sets out when, why and how Kellogg Asia Marketing Inc ("Kellogg") collects, uses, discloses and otherwise processes certain personal information and complies with the Personal Data Protection Act 2012 (Singapore) ("Personal Data Protection Act").

When we use the term "personal information" in this Privacy Policy, we are referring to information that relates directly or indirectly to you (such as your name, national identification number, email address etc.) or any other information that may otherwise identify you whether directly or indirectly.

### **Summary**

Kellogg approaches communications with consumers on the Internet, on the telephone and by written communications with respect for, and commitment to, individual privacy rights, and the different sensibilities of our child consumers. We support active self-regulation of this new environment to ensure that responsible marketers can maintain the right to use all communication media to interact with its consumers.

You are encouraged to read each provision in this Privacy Policy. In summary, by providing your personal information to Kellogg or by using the Kellogg website and/or social media pages, you agree and consent to our collection, storage, disclosure, usage and processing of your personal information for the purposes set out below and in accordance with this Privacy Policy.

You may contact us in writing as set out below if you want to know what personal information we hold about you, correct any of your personal information, exercise any of the rights to your personal information, or if you have any complaints or queries in respect of your personal information.

### **Kellogg Privacy Policy Statement**

Kellogg recognises its obligation to its customers and community to adhere to the highest standards of decency, fairness, and integrity in all its operations. Likewise, we are dedicated to the fundamentals of protecting consumer privacy, especially for children. This means that, from time to time, our policies will be reviewed and may be updated, revised, modified and supplemented. Kellogg reserves the right to change the information, features, products, disclosures and this Privacy Policy at any time and notify you by posting an updated version of the Privacy Policy on our website. Please check this Privacy Policy periodically for changes. Alternatively, you can contact us (see below) to receive an updated hard copy of this Privacy Policy. Your continued use of the Kellogg website or our services following the posting of changes to this Privacy Policy indicates that you have read the Privacy Policy in place at that time. By continuing to use this website or our services after any changes are made means that you accept those changes.

This Privacy Policy is based on the Personal Data Protection Act to protect personal information. Unless you provide us with your consent to do otherwise, Kellogg will only collect, use, store, disclose and/or otherwise process your personal information as set out below.

## **Gathering and Use of Personal Information**

Kellogg may collect and retain personal information (such as your name, identification card or work permit number (where applicable), email address, home address and telephone number) from a variety of sources. This includes personal information that:

- (a) is provided to us when you contact us (either by submitting a form (online or otherwise), writing to or calling us) or participate in a Pringles consumer contest or promotion;
- (b) is collected automatically by your visits to and activities on our website and social media pages; or
- (c) is collected from other sources, such as our third party partners or platform providers.

Generally, Kellogg will not collect any sensitive personal information (such as information relating to racial or ethnic origin, membership of political bodies, religion or trade unions, criminal records, state of health or medical history), unless where required by law or with your express consent. If Kellogg hold any sensitive personal information about you, such information will only be processed and/or disclosed by Kellogg for the purpose for which it was provided. If Kellogg asks for sensitive personal information, Kellogg will explain the reason for such request prior to or at the time of collection of such information.

Any personal information which Kellogg does receive will be used for the following purposes:

- (a) to administer, run or otherwise manage any contests or promotions that you have entered into, including to contact and communicate with you in relation to such contest or promotions;
- (b) to process and respond to queries, requests, applications, complaints and feedback from you;
- (c) to manage your registration or subscription to our newsletter and any other marketing materials;
- (d) to create a database record of information about you in order to understand and assess your interests, wants and needs;
- (e) to send you marketing information about our goods or services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes products and services tailored to your interest;
- (f) for the purposes of managing our everyday business needs regarding your participation in our contest or promotion, your enquiries and request and our product, quality, communications, services and website improvement;
- (g) for other legitimate business purposes, including fraud detection and prevention purposes, maintenance of business records and compliance with our legal obligations; and/or
- (h) any other incidental business purposes related to or in connection with the above.

Only where indicated (for example in the contest entry form, requests forms for information from Kellogg or where required by law), is it obligatory for you to provide your personal information to us. Failure to provide such personal information may result in us being unable to provide you with the services or information requested. Occasionally we may also ask on a voluntary basis for personal information for our own internal use (e.g. for training, marketing and research), but we still maintain yours and your children's privacy and will not sell this information to third parties. Only those who ask for information from us will receive

communications from us (if we email you, then please refer to our online privacy policy on our website).

### **Disclosure to third parties**

Being a part of a multinational organisation, Kellogg may share your personal information within the Kellogg Company group and with selected third parties, which may be located within or outside of the country of your jurisdiction, in the following circumstances:

- (a) within the Kellogg Company group, including its employees, affiliates and subsidiaries, for various reasons relating to Kellogg' business including but not limited to product, services and communications improvements, internal trainings, customer strategy and growth, investment and any corporation-related exercise such as restructuring, merger or divestment;
- (b) our third party service providers, such as mailing houses, call centres and information technology service providers;
- (c) government authorities or other third parties, if required by law or reasonably necessary to protect our rights, legal interests, property or safety of others or ourselves.

Kellogg may also provide or transfer your personal information to the entities located outside of Singapore to administer, implement and/or operate certain functions or services on our behalf. To the extent that your personal information is transferred to or retained or processed in a place outside of Singapore, Kellogg will undertake reasonable measures for protecting that personal information.

Save for the above, Kellogg will not sell, disclose, provide or transfer your personal information to any third parties without your consent unless:

- (a) required by law;
- (b) to implement our terms and conditions (for example a contest); or
- (c) to protect the rights, property or the safety of any member of the public or Kellogg.

### **Data retention**

Any personal information that you provide Kellogg will be stored on a secure Cloud server located in the United States of America. The Cloud server is maintained by Kellogg ultimate parent company, Kellogg Company. As the Cloud server is maintained by Kellogg Company, Kellogg Company may access and process your personal information for the purposes of maintaining and administrating your personal information on the Cloud server and for internal purposes only.

### **Your rights**

You have the right to access and correct the personal information that we process about you. Where we process your personal information for direct marketing purposes, you have the right to object at any time to such processing. If you object to processing for direct marketing purposes, we will no longer process your personal information for such purposes.

Where we have obtained your consent for the processing of your personal information, you also have the right to withdraw your consent at any time. However, such withdrawal of consent

will not affect the lawfulness of the processing that has happened based on your consent prior to the withdrawal.

To exercise these rights, you may submit your request via email as set out below. Notwithstanding the above, we may refuse a request to access, rectify or limit your data where permitted or required by law.

To protect the security of your personal information, you may be required to provide identification before we proceed with your request to exercise your rights. If we are required to contact you in relation to any event that involves your personal information, we may do so by e-mail, telephone, or mail.

### **Protection of Personal Information**

To safeguard your personal information from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection and encryption to secure all storage and transmission of personal information by us, and disclosing personal information both internally and to our authorised third party service providers and agents only on a need-to-know basis.

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.

### **Accuracy of Personal Data**

We generally rely on personal information provided by you (or your authorised representative). In order to ensure that your personal information is current, complete and accurate, please update us if there are changes to your personal information by informing us via email at the contact details provided below.

### **Questions**

If you want to know what personal information Kellogg holds about you, in most cases you are able to gain access to this personal information by contacting us via email at [contactus.sea@kellogg.com](mailto:contactus.sea@kellogg.com). A request to exercise any of your rights, any complaints or inquiries should also be directed to that office.

### **Governing Law**

This Privacy Policy shall be governed in all respects by the laws of Singapore. For the avoidance of doubt, the applicable data protection laws will apply to the processing of your personal information.