



VENTURE CORPORATION LIMITED

PERSONAL DATA PROTECTION POLICY

Last Updated: 30 September 2024

1. Preface

This policy is intended to help you understand our policies and practices with respect to personal data that is collected, used, disclosed or otherwise processed by Venture Corporation Limited and its subsidiaries (collectively, "**Venture**"). It is also intended to inform you as to how you may request for access to and correction of your personal data as well as how to make an inquiry and, if necessary, make a complaint relating to our handling of that data.

References to "Venture", "we", "us" or "our" in this Policy includes, individually and collectively, all subsidiaries and associated and affiliated entities of the Venture Corporation Limited group of companies that collect, use, disclose and/or process "personal data" or "personal information", as defined under applicable law.

For the purposes of this Policy, "personal data" is any information that is about or that identifies a specific individual, in accordance with the laws applicable to you. "**Services**" means any services we provide through your interaction with our website, and other related services, including any sales, after-sales, marketing, or events.

Unless otherwise stated, this Policy applies in conjunction with any other data protection or privacy notice, policy or terms and conditions which we may publish or give to you from time to time. Venture may have entered into separate agreements with customers, employees and other data subjects that contain specific data protection provisions and, in such instances, the terms of those agreements shall prevail over the terms of this Policy.

By using Venture's websites or any Services of Venture, you consent to the terms of this Policy. If you do not agree to the terms and conditions of this Policy, including having your personal data (as defined above) used in any of the ways described in this Policy, do not provide us with your information. Please note, however, that if you do not provide us with your information, you may not be able to use certain parts or features of our website or we may not be able to provide you certain Services.

2. Venture's Commitment to Privacy

We respect the privacy of personal data disclosed to us, and are committed to protecting your personal data in accordance with applicable laws. We outline below our policy on the collection, use, disclosure and processing of your personal data.

In addition to the provisions set out in this Policy, additional terms and information relating to our processing of your personal data may apply to you depending on where you are located. These additional terms are set out as Appendices to this Policy:

- (a) if you are located in the European Economic Area (**EEA**), please see Appendix [1] for additional terms and information;
- (b) if you are located in California, United States, please see Appendix [2] for additional terms and information.



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3. Collection, Use and Disclosure of Personal Data by Venture

The personal data we collect and how we do so will vary based on the reason that we are collecting the data.

Examples of Personal Data Collection Points

Venture may collect personal data about you in the following circumstances:

- (a) Venture collects personal data from applicants when they apply for employment with Venture and from employees during the course of their employment with Venture.
- (b) Visitors of Venture facilities may be asked to provide their personal data for security and tracking purposes if they wish to either access the facilities, and/or tap onto Venture's wireless internet infrastructure.
- (c) Visitors of Venture websites may be asked to provide us with some personal data if they wish to interact with us via our websites or if they wish to obtain specified investor information from Venture's vendors or if they purchase any goods from us.
- (d) Venture's website contains links to other Venture websites that adhere to the same privacy principles. For links to non-Venture entities, Venture would not be responsible for the privacy practices or the content of such websites and advise that you read the privacy statements of each website you visit which may collect your personal data.
- (e) At various places on the website, or in the course of obtaining the services provided by Venture, you may be required to provide certain personal data such as your full name, email address, address, country of residence, telephone number and other personal data, in order to access or use certain features or services of the website, or to otherwise obtain our services. For example, personal data may be collected when you request for samples, price lists, quotations and/or sales and product information, provide comments, suggestions or feedback, or when you contact our customer service or helpdesk via email or other channels. You can always choose not to provide your personal data, but you may not be able to access or use certain features or services of Venture's websites, or to obtain certain Services from us.
- (f) If you purchase a product or service via Venture's websites, you may be required to provide us with your credit card details. These details will only be used to process your purchase. We will not disclose your credit card details to any third parties for marketing purposes under any circumstances.
- (g) When you become a shareholder of Venture or in the course of your shareholding in Venture. For example, you provide your Personal Data to the Company's company secretary, investor relations officers and share registrar via emails, phone calls or at general meetings. For shareholders of Venture Corporation Limited, we may seek information from the Central Depository (Pte) Limited or through our appointed share registrar in connection with your shareholding in the company.



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Use of Cookies

All of our websites use a standard technology called "cookies" to collect information about how our websites are used, which may include your personal data. The use of cookies is essential to the operation of our websites. You may opt-out of receiving cookies by disabling cookie support but doing so may prevent our websites from functioning properly and you may not be able to use fully all of the available features and information.

The website also uses cookies/advertising IDs for the purpose of advertising. This enables us to show our advertisements to visitors who are interested in our products, Services and solutions on partner websites. Re-targeting technologies use your cookies or advertising IDs and display advertisements based on your past browsing behavior.

Third Party Service Providers

We usually collect your personal data directly from you but sometimes we may need to collect personal data about you from third parties. For shareholders of Venture Corporation Limited, we may seek information from the Central Depository (Pte) Limited or through our appointed share registrar in connection with your shareholding in the company.

4. Accuracy of Data Provided by You

When providing your personal data to us, please ensure that it is accurate and complete.

If you provide personal data relating to a third party to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and disclosure of the personal data for the purposes listed in this Policy.

5. Purposes of Processing Personal Data

We may collect, use and disclose personal data relating to you that is reasonably necessary for our business functions and activities for the following purposes (as may be applicable):

- (a) Internal record keeping;
- (b) Review and administration of employment performance, status and contracts by our management team and employees who have an official business need to access your personal data;
- (c) Administering of shareholder relationships, including maintenance of the shareholder register, handling of dividend or other payments, facilitating communications with you (e.g. sending notices of general meetings, annual reports and shareholder circulars), facilitating corporate actions, registering shareholders at general meetings and other shareholder events, taking photographs and/or video recordings of you at general meetings and posting the same on the Company's website or other appropriate media;
- (d) Security and surveillance of our offices and facilities;
- (e) Conducting identity, credit, and conflict checks to prevent and detect fraud and crime;



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- (f) To make certain automated decisions, such as profiling your geographical location (e.g., Asia, Europe or Americas) in order to direct you and/or your enquiries to the appropriate geographical website and/or resources;
- (g) Performing any functions and activities related to the products and/or services that Venture provides, including to manage and administer our relationship with you and/or your company;
- (h) To respond to your queries, requests and complaints;
- (i) To ensure the smooth functioning of our website; and/or
- (j) Complying with any obligations, requirements or arrangements for disclosing and using personal data that apply to us or that we are expected to comply with pursuant to any law, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies, existing currently and in the future.

The amount of personal data that you provide to us will normally be limited to that which is necessary for the purpose it is collected. Consistent with applicable laws, your personal data will not be used for any purpose other than as stated herein or notified to you.

If we wish to collect, use or disclose your personal data for purposes additional to that stated in this Policy, we will inform you of the same. We will only collect, use or disclose your personal data for such additional purposes upon your consent or notification.

Venture has databases in the various countries where it operates. Venture may transfer your personal data within the Venture group or to Venture's service provider located outside of your home country which offers the same or similar level of protection of your personal data that Venture offers. For transfers of personal data outside of Venture group, those are framed by contracts to ensure similar level of protection and security of your personal data.

We will always apply appropriate safeguards to protect personal data concerning you, and your rights and freedoms in relation to that personal data, and we will take all necessary measures to protect your personal data in accordance with this privacy policy and applicable laws.

6. Disclosure to Third Parties

We receive services from external service providers located around the world, and your personal data may be provided to them for this purpose. We may also disclose your personal data to third parties for the purposes listed above and as permitted by applicable law. Third parties to whom we disclose your personal data may include:

- (a) Any agent, contractor or third party service provider who provides operational or administrative services to Venture, such as company secretaries, share registrars, e-polling service providers, scrutineers, telecommunications, cleaning, security, training, computer or IT support, payment or securities clearing;
- (b) Our professional advisers which include, but are not limited to, auditors, lawyers, and consultants;



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- (c) Credit reference agencies;
- (d) A third party that acquires all or substantially all of us or our business. We may also disclose your information to third parties if we either: (a) sell, transfer, merge, consolidate or reorganise any part(s) of our business, or merge with, acquire or form a joint venture with, any other business, in which case we may disclose your data to any new owner or other third party involved in such change to our business; or (b) sell or transfer any of our assets, in which case the information we hold about you may be sold as part of those assets and may be transferred to any new owner or other third party involved in such sale or transfer.
- (e) Any person to whom disclosure of personal data is necessary in order for us to validly effect, manage, administer and/or enforce any services or transactions requested or authorised by you;
- (e) Any person to whom we are under an obligation or otherwise required to make disclosure under the requirements of any applicable law, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, self-regulatory or industry bodies or industry recognised bodies; and/or
- (f) Any other party whom you authorise us to disclose your personal data to.

Apart from the third parties mentioned above, unless we are obliged or permitted by applicable laws to do so, your personal data will not be disclosed to third parties without your consent.

In the event that we transfer your personal data outside of our organization, we shall take all reasonable steps to ensure that it is provided with a comparable standard of protection. Venture will require vendors or organisations who handle your personal data on our behalf to adhere to the confidentiality and respect your privacy and comply with the applicable laws. We will also require these vendors or organisations to use your personal data only for the same purposes and follow our reasonable directions with regard to such information. However, Venture does not provide any warranty or take any responsibility of any misuse undertaken by third parties in respect of your personal data.

7. Security and Retention

Venture understands the importance of personal data to you and will do our best to ensure the security and reliability of your personal data. Venture hereby promises that we will take security measures to protect your personal data according to mature standards of the industry.

We store personal data in a combination of secure computer storage facilities and paper based files and protect personal data in our possession or under our control by making reasonable physical, technical, administrative and procedural security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks.

However, despite our safeguards and efforts to secure your information, no electronic transmission over the Internet or information storage technology can be guaranteed to be completely secure, so we cannot promise or guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your information. In the event of a security incident such as a personal data breach, we will initiate an emergency plan to prevent the magnification of the security incident, and will notify you via push notifications, announcements, etc.



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We do not keep your data for longer than is necessary unless we are required to do so under law. Where we no longer require any personal data that we collect or the purpose for collection, use or disclosure no longer serves Venture's business or legal purpose, such personal data would be destroyed or the particulars or information which may identify you would be removed.

8. Accuracy and Updates to Your Personal Data

We will take all reasonable steps to ensure that the personal data in our possession or under our control is accurate and up-to-date at the point of collection and at regular intervals afterwards. If any personal data of a data subject is inaccurate or incomplete, Venture will take all reasonable steps to correct or update such information upon notification by you.

Where you provide your personal data directly to us, we shall be entitled to assume that it is accurate and complete. If there is any change in your personal data, you should inform us as soon as possible and in any event within any relevant prescribed period to enable us to update our data.

We will take all practicable steps to ensure that personal data is kept only for as long as the purpose for which it was collected is being served or as otherwise necessary for legal or business purposes.

9. Access and Correction

You have the right to request and obtain access to certain personal data that is in our possession or under our control and to have personal data relating to you which is inaccurate corrected in certain circumstances. Upon written request to our Personal Data Protection Officer and under supervision of a Venture Human Resources Department representative or such other representative, Venture will allow you to review your personal data being held by Venture, including information relevant to the use and disclosure of your personal data. However, under certain limited circumstances, Venture may not be able to provide you access to all of your personal data where such refusal is permitted or required by applicable law or regulation. Depending on the nature of your request and subject to any contract or other terms and conditions agreed between us, Venture may impose a reasonable fee to provide access to the personal data you requested. In such an event, we shall inform you of the fee payable for your confirmation and acceptance prior to further processing your request.

If you subscribe to any Service provided by Venture through this website or otherwise, and you wish to terminate that subscription and have all personally identifiable information about you removed from any list Venture or our vendors maintain, please contact Venture by sending email to our Personal Data Protection Officer informing us of your request. We will promptly make every reasonable effort to remove all personally identifiable information about you from our records.

10. Withdrawing Consent

You may at any time withdraw any consent given in respect of the collection, use or disclosure of your personal data by giving prior written notice in the form of a formal written request addressed to our Personal Data Protection Officer in writing (contact details below). Please allow Venture a reasonable period of time to cease the collection, usage and disclosure of your personal data after you have submitted your withdrawal request. Please note that once consent is withdrawn, Venture shall cease to collect, use and/or disclose your personal data (within the scope of your withdrawal of consent), in which case Venture may not be in a position to continue providing the services which



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you had engaged us to provide.

11. Your Rights and Choices

The rights you have in relation to your personal data, and how we use it depend to a great extent on where you are located, or where you reside – please see the Appendices for further details as they apply to your location. You can exercise your rights by contacting us via email at dataprotection@venture.com.sg.

12. Transfers of Personal Data Overseas

Your personal data might be transmitted to or accessed from a jurisdiction outside of the country/region where you are located. Such jurisdiction might have a different data protection law. In situations where we transfer your personal data overseas, we will take steps to ensure that the overseas recipient is required to have in place appropriate levels of protection necessary to maintain the security and integrity of your personal data and that any transferred personal data is processed in accordance with all applicable laws.

For instance, we will ask you for your consent to the cross-border transmission of your personal data, or employ data de-identification and other security measures before the cross-border transmission of data.

13. Minors and Children

We do not knowingly collect or solicit personal data from children under the age of 14. By using our websites or Services, you represent that you are at least 13 years old. If you are under 14, please do not attempt to send any personal data about yourself to us.

We do not knowingly collect personal data from children for any purpose. If you believe that we have personal data of a child without parental/guardian consent, or if you are the parent or guardian of the user and wish to withdraw consent, please contact our Personal Data Protection Officer in writing via email (contact details below) and we will delete such information from our files and records.

Furthermore, we encourage users of our websites that are minors that are 13 years of age or older to ask their parents or guardians for permission before sending any information about themselves over the Internet.

14. Contact Us

If you have any questions, complaints or concerns relating to Venture's policies relating to the Personal Data Protection, please contact our Personal Data Protection Officer by email or by post:

Email address: dataprotection@venture.com.sg

Postal address: 5006 Ang Mo Kio Ave 5 #05-01/12 TECHplace II Singapore 569873

We may update this Policy from time to time. The updated version will be indicated by an updated revised date and the updated version will be effective as soon as it is accessible. If we make material changes to this Policy, we may notify you either by prominently posting a notice of such changes and/or by directly sending you a notification. We encourage you to review this Policy frequently to be informed of how we are collecting, using, disclosing and protecting your personal data.



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You can see when this Policy was last updated by checking the “Last Updated” date displayed at the top of this Policy.

Please note that this Policy relates only to your access and use of our websites and/or the Services operated by Venture. This Policy does not apply to any third-party services, or any other third-party products, services or businesses who will provide their services under their own terms of service and privacy policy.



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ADDITIONAL INFORMATION FOR INDIVIDUALS LOCATED IN EUROPEAN UNION

In the following section:

“**Controller**” means Venture Corporation Limited, the company acting as controller of your personal data as that term is defined in the GDPR.

“**GDPR**” means the General Data Protection Regulation (EU) 2016/679.

“**Personal data**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

This Policy is directed at data subjects located in the EEA (specifically, Spain) and provides all the information required to be provided by Articles 13 and 14 GDPR.

Purposes and Legal Basis of Processing

We use personal data collected via our Services for a variety of business purposes as described in this Policy. In most cases we process your personal data for these purposes in order to pursue our legitimate business interests.

In some many situations, we will have more than one purpose. For example, if you have purchased one of our products or Services, we will also collect and process your personal data in order to perform our contract with you.

In certain situations, we may also process personal data concerning you in order to comply with a specific legal obligation.

In the list below, we have set out the relevant lawful bases that apply to each purpose for which we use your personal data as described in section 5 of the Policy (including the sharing and disclosure of your personal data for the purposes as per section 6 of the Policy).

Purposes for which we use your personal data (by reference to section 5 of the Policy)	Lawful basis
Review and administration of employment performance, status and contracts by our management team and employees who have an official business need to access your personal data	Legitimate interests (to enable Venture to assess your performance and manage the employment relationship).
Maintenance of the shareholder register, handling of dividend or other payments, facilitating communications with you (e.g. sending notices of general meetings, annual reports and shareholder circulars), facilitating corporate actions,	Legitimate interests (to enable Venture to manage the shareholder relationship)



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Purposes for which we use your personal data (by reference to section 5 of the Policy)	Lawful basis
registering shareholders at general meetings and other shareholder events, taking photographs and/or video recordings of you at general meetings and posting the same on the Company's website or other appropriate media;	
Security and surveillance of our offices and facilities	Legitimate interests (to enable Venture to conduct checks and monitor security).
Conducting identity, credit, and conflict checks to prevent and detect fraud and crime	Legitimate interests (to enable Venture to conduct checks and detect fraud).
To make certain automated decisions, such as profiling your geographical location (e.g., Asia, Europe or Americas) in order to direct you and/or your enquiries to the appropriate geographical website and/or resources;	Legitimate interests (to enable Venture to run its website).
Performing any functions and activities related to the products and/or services that Venture provides, including to manage and administer our relationship with you and/or your company	Legitimate interests (to enable Venture to run and administer its business and to perform its obligations in the provision of Services).
To respond to your queries, requests and complaints	Legitimate interests (to enable Venture to run and administer its business and to perform its obligations).
To ensure the smooth functioning of our website	Legitimate interests (to enable Venture to run its website).
To comply with legal or regulatory requirements, or as otherwise permitted by law	Legal obligations, legitimate interests (to cooperate with law enforcement and regulatory authorities). With respect to special categories of personal data, we will usually rely on legal claims, substantial public interests (processing for the prevention and detection of fraud/crime) or very rarely where necessary, explicit consent

Please find below an explanation of the lawful bases of processing personal data.

The main lawful bases for our use of personal data are as follows:	The main lawful bases for our use of special categories of personal data are as follows:
Legitimate interests: where we have a legitimate interest in using your personal data. We will only rely on this lawful basis if we consider that our interest in using your	Explicit consent: where you have given your explicit consent to the processing of those personal data for one or more specified purposes. You may withdraw your



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The main lawful bases for our use of personal data are as follows:	The main lawful bases for our use of special categories of personal data are as follows:
personal data for the relevant purpose is not outweighed by any interests that you may have, or any prejudice that you may suffer, from the relevant use of your personal data	consent to the use of your personal data by contacting us as per the section 10 of the Policy. However, depending on the scope of your withdrawal, we may be unable to provide all or part of our services that require the processing of your special categories of personal data
Legal obligation: where we need to use your personal data to comply with our legal obligations	Substantial public interest: where we need to process your personal data for reasons of substantial public interest set out in EU law
	Legal claims: where your personal data is necessary for us to establish, exercise or defend any legal claims

Restricted Transfers

Where Venture transfers personal data from inside the EEA to outside these countries, Venture may be required to take specific additional measures to safeguard the relevant personal data.

Certain countries outside the EEA are considered under applicable data protection law to provide essentially equivalent protections to personal data and therefore no additional safeguards are required to export personal data to these jurisdictions.

In countries that have not had these approvals, Venture will establish legal grounds justifying such transfer, such as EU Commission-approved model contractual clauses, or other legal grounds permitted by applicable legal requirements.

You explicitly consent to the transfer of your personal data to servers in California, Singapore, Malaysia and China, having been advised of certain potential dangers to the privacy of your personal data in those jurisdictions.

EU Data Protection Rights

Under the GDPR, and other data protection law applicable in Spain, you have certain specific rights relating to your personal data which are set out below. If you wish to exercise any of the data protection rights outlined below, please contact our Personal Data Protection Officer via email at dataprotection@venture.com.sg.

Access – In all circumstances, you have the right to access your personal data and certain information about how and why we are processing it, including, in most cases copies of personal data that we process.

Rectification – In all circumstances, you have the right to have any inaccurate or incomplete personal data rectified without undue delay.

The following rights do not apply in all circumstances. However, you are always welcome to contact us



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with any request relating to processing of your personal data and, even if we are not obliged by law to comply with your request, we will try to accommodate your wishes.

Erasure – sometimes called the ‘right to be forgotten’, in certain circumstances, you have the right to have your personal data erased without undue delay.

Restriction - you have the right to have our processing of your personal data restricted whilst a complaint is being investigated.

Data portability - in certain limited circumstances, you have the right to receive the personal data concerning you that you have provided to us, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller without hindrance.

Objection - in circumstances where we are processing personal data that concerns you on the lawful basis of legitimate interest only, you have the right to object to the processing of your personal data carried out by us or on our behalf.

Withdrawal of Consent – If you have provided us with your consent to process your data, you have the right to withdraw your consent at any time. The withdrawal of your consent does not affect the legality of the processing carried out on the basis of the consent until the withdrawal.

Your exercise of these rights is subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege).

If you exercise any of these rights, we will check your entitlement and respond without undue delay, in any event within a month.

If you are not satisfied with how we have addressed your complaint or concerns, please contact our Personal Data Protection Officer via email at dataprotection@venture.com.sg.

Making A Complaint – Although we would strongly encourage you to let us try and resolve any issue you have regarding your personal data first, in all cases where you think we have not complied with the requirements of the GDPR as it applies to your personal data, and in addition to your rights set out above, you have a right to lodge a complaint with a Data Protection Supervisory Authority.

If you are located in Spain, you can send your complaint directly to the Supervisory Authority in Spain, Agencia Española de Protección de Datos (“**AEPD**”).



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ADDITIONAL INFORMATION FOR RESIDENTS OF CALIFORNIA

“**Personal information**,” for purposes of this section regarding the rights of California residents, does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

California Privacy Rights. If you are a resident of the state of California, you have the following additional rights:

- a. **Right to Know/Access.** You can request a listing of the types of personal information we have collected about you, the sources of that information, how we use the information (e.g., our business or commercial purposes for collecting, selling, or sharing personal information), other individuals and business with whom we share personal information, and the specific pieces of personal information that we have collected about you. If you would like the above information, you may you can reach out to us via email. Contact information is at the bottom of this section. When you make a request under your Right to Know, we will verify your identity as stated in the “Identity Verification” section below.
- b. **Right to Correct/Rectification.** You have the right to correct any of your personal information in our records and systems. You may request us to rectify, correct or update any of your personal information held by us that is inaccurate. If you would like the information about you to be corrected, you may you can reach out to us via email. Contact information is at the bottom of this section. When you make a request for correction, we will verify your identity as stated in the “Identity Verification” section below.
- c. **Right to Delete/Erasure.** Under certain circumstances, you have the right to request that we delete the personal information that we hold about you. If you would like the information about you to be deleted, you may you can reach out to us via email. Contact information is at the bottom of this section. When you make a request for deletion, we will verify your identity as stated in the “Identity Verification” section below.
- d. **Right to Portability.** Under certain circumstances, you have the right to receive personal information we hold about you in a structured, commonly used, and machine-readable format so that you can provide that personal information to another entity.
- e. **Right to Opt-Out of Selling and Sharing for Targeted Advertising.** You may have the right to opt-out of: (i) the sale of your personal information; and (ii) the sharing of your personal information for targeted advertising. While we do not sell your personal information for money, like many websites, we use cookies, pixels, and similar technology, and we may share certain information, such as your IP address or device identifiers, to certain third-party advertisers in order to improve your user experience and to optimize our marketing activities. Under California privacy law’s broad definition of “sell”, this could be considered a sale, and it would be considered sharing of your personal information for targeted, behavioral advertising purposes. You have the right to direct us not to sell your personal information, and to direct us not to share or use your personal information for targeted advertising purposes. To exercise your right to opt-out, please submit a request to our Personal Data Protection Officer at dataprotection@venture.com.sg. Please note that you may still receive generalized ads after opting out of targeted advertising.
- f. **Right Against Discrimination.** You have the right not to be discriminated against for exercising any of the rights described in this section. We will not discriminate against any California consumer because such person exercised any of the consumer’s rights under California Consumer Privacy Act (CCPA) and California Privacy Rights Act (CPRA), including, but not limited to:
 - Denying goods or services.
 - Charging different prices or rates for goods and services, including through the use of discounts or other benefits or imposing penalties.



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- Providing a different level or quality of goods or services.
- Suggesting that the consumer will receive a different price or rate for goods or services or a different level or quality of goods or services.

We may, however, charge a different price or rate, or provide a different level or quality of goods or services, if that difference is related to the value provided to you by your data.

- g. **Right to Limit the Use of Sensitive Personal information.** You have the right to limit the use of sensitive personal information used to infer characteristics about you. We do not collect sensitive personal information or use it to infer characteristics.
- h. **Right to Object to Automated Decision-Making.** Upon issuance of regulations by the California Privacy Protection Agency, you will have the right not to be subject to a decision that is based solely on automated processing (where a decision is taken about you using an electronic system without human involvement) which significantly impacts your rights. No decision will be made by us about you solely on the basis of automated decision making which has a significant impact on you.
- i. **Shine the Light.** California Civil Code Section 1798.83, also known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year.

Identity Verification

If you request to access, correct inaccurate personal information or delete personal information, we will need to verify your identity before processing your request. When you make a request for your rights to access, correction, or deletion, you can expect the following:

- After you request access, correction, or deletion, you will need to confirm that you want your information accessed, corrected, and/or deleted.
- We will verify your identity.
- We will confirm our receipt of your request within 10 days. If you have not received a response within a few days after that, please let us know by contacting us via the email below.
- We will respond to your request within 45 days. If necessary, we may need an additional period of time, up to another 45 days, but we will reply either way within the first 45-day period and, if we need an extension, we will explain why.
- In certain cases, a request for access, correction, or deletion may be denied, for example, if we cannot verify your identity, the law requires that we maintain the information, or if we need the information for internal purposes such as providing Services or completing an order. If we deny your request, we will explain why we denied it and delete any other information that is not protected and subject to denial.

Authorized Agents

If you would like, you may designate an authorized agent to make a request under the CCPA on your behalf. We will deny requests from agents that do not submit proof of authorization from you. To verify that an authorized agent has authority to act for you, we may require a copy of a power of attorney or require that you provide the authorized agent with written permission and verify your own identity with us.

To request additional information, or make any of the requests described above, you can reach out to us via email at dataprotection@venture.com.sg.