



# Privacy Policy

*Last modified: 05 August 2025*

This Privacy Policy ("**Policy**") describes how the Consumers Association of Singapore ("**CASE**", "**we**", "**us**" or "**our**") collects, uses, processes and discloses your Personal Data through the Price Kaki App.

This Policy is incorporated as part of the Terms of Use. Your use of the Price Kaki App is subject to the Terms of Use and this Policy. Unless specifically defined in this Policy, the defined terms shall have the same meaning as defined in the Terms of Use.

"Personal Data" is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, Price Kaki App account name, profile picture, mobile number, email address, and ranking on the respective leader boards.

## 1. Collection of Personal Data

We collect Personal Data about you in the ways listed below. We may also combine the collected Personal Data with other data in our possession. CASE takes reasonable efforts to ensure that your Personal Data collected by us is accurate and complete.

### *1.1. You provide your Personal Data to us*

We collect your Personal Data when you voluntarily provide it to us. For example, you may provide your Personal Data to us when you:

- Register an account on the Price Kaki App;
- Provide information to claim the Rewards; and
- Provide comments in your correspondences with us.

### *1.2. When you use the Price Kaki App*

Personal Data may be collected through the normal operation of the Price Kaki App. Some examples are:

- Your location; and
- Information about how you interacted on the Price Kaki App (such as features used, search history and content viewed).

## 2. Use of Personal Data

CASE may use, combine and process your Personal Data for the following purposes ("**Purposes**").



## *2.1. Providing services and features*

Your Personal Data will be used to provide, personalise, maintain and improve the Price Kaki App. This includes using your Personal Data to:

- Create, and update your account;
- Enable features that personalise your Price Kaki App, such as lists of your favourite places and previous destinations;
- Share information on the Price Kaki App via the “share” function;
- Perform internal operations necessary to make the Price Kaki App available;
- Protect the security or integrity of the Price Kaki App;
- Compile and release information regarding your use of the Price Kaki App;
- Verify your identity at the point of redemption of Rewards; and
- Process, validate and manage your Rewards.

## *2.2. Customer support*

We use Personal Data to resolve customer support issues. For example, we may:

- Investigate and address customer feedback;
- Monitor and improve our customer support responses;
- Respond to questions and comments; and
- Inform you about steps taken to resolve customer support issues.

## *2.3. Research and development and security*

We may use the Personal Data we collect for testing, research, analysis and product development. This allows us to understand and analyse your needs and preferences, protect your Personal Data, improve and enhance the safety and security of the Price Kaki App and to develop new features.

## *2.4. Legal purposes*

We may use the Personal Data we collect to investigate and resolve claims or disputes, or as allowed or required by applicable law.

We may also use your Personal Data when we are required, advised, recommended, expected or requested to do so by our legal advisors or any local or foreign legal, regulatory, governmental or other authority.

For example, we may use your Personal Data to:

- Comply with court orders or other legal, governmental or regulatory requirements;
- Enforce our Terms and Conditions or other agreements; and
- Protect our rights or property in the event of a claim or dispute.

# **3. Disclosure of Personal Data**

We need to share Personal Data with various parties for the Purposes. These parties include:



### *3.1. Other account holders*

As an account holder, your account name, profile picture and ranking would be disclosed to other account holders on the leader boards on the Price Kaki App.

### *3.2. With CASE's service providers and business partners*

We may provide Personal Data to the Participating Outlets, Merchants, consultants, marketing partners, research firms, and other service providers or business partners.

## 4. Retention of Personal Data

CASE shall retain your Personal Data for as long as you maintain your account on the Price Kaki App. To safeguard your Personal Data, all electronic storage and transmission of Personal Data would be secured with the appropriate security technologies.

Once your Personal Data is no longer necessary for the Purposes, or we no longer have a legal or business purpose for retaining your Personal Data, we would take steps to prevent access or use of such Personal Data for any purpose other than compliance with this Policy, or for purposes of safety, security, fraud prevention and detection.

## 5. Withdrawal of Consent

You may refuse or withdraw your consent for CASE to collect, use, or disclose your Personal Data at any time by submitting a request through the **Price Kaki app's settings** or by emailing **it\_pricekaki@case.org.sg**. CASE will process your request **within 30 calendar days**. Please note that upon withdrawal of consent, your Price Kaki account will be deactivated, and you will no longer be able to access app features, including saved data, points, and survey participation. Your personal data will be retained and securely disposed of in accordance with our Data Retention Policy.

Notwithstanding the above, the withdrawal of consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## 6. Amendments and updates

We reserve the right to modify, vary and change the terms of this Policy at any time without prior notice to you by posting such changes on the Price Kaki App. Such modification, variations and/or changes to this Policy shall be effective upon the posting of an updated version on the Price Kaki App.

You have the right to:

- **Access** your Personal Data that we hold;
- **Request correction** of any inaccuracies in your Personal Data.

To exercise these rights, please contact our Data Protection Officer at **dataprotection@case.org.sg**. We will respond to your request **within 30 calendar days** from the date of receipt.



## 7. Measures to Protect Personal Data

We have implemented reasonable administrative, physical and technical measures to protect your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. These measures include:

- Secure servers and firewalls;
- Encryption and secure storage;
- Access control policies limited to authorised personnel only.

We also regularly review and update our data protection practices to ensure the continued security of your Personal Data.

## 8. Cross-border Transfers of Personal Data

In certain cases, your Personal Data may be transferred to and stored in servers located outside Singapore. When this occurs, we ensure that such transfers are carried out in compliance with the requirements of the Personal Data Protection Act (PDPA) of Singapore, and that recipients provide a standard of protection comparable to that provided under the PDPA.

## 9. Data Breach Notification

In the event of a data breach that results in, or is likely to result in, significant harm or impact to you, we will notify you and the Personal Data Protection Commission (PDPC) as soon as is practicable. We have in place procedures for managing and responding to data breaches to mitigate any potential harm.