

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 Stronghold MMA Pte. Ltd. (Company Registration Number 201913329K) ("**Stronghold MMA**") or when you use the website www.stronghold.sg ("**website**") or any of Stronghold MMA's smart phone or 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 Stronghold MMA, whether you have provided such personal data through our website, over the phone, at the gym operated by Stronghold MMA, 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 Stronghold MMA. 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 Stronghold MMA's privacy practices, please contact us at sgstronghold@gmail.com.

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 gym. The information that we collect will depend on how you use the services offered by our gym.

Data that you might have provided to us includes:

- data provided in applying for Stronghold MMA memberships – for example, your contact details and credit card details;
- data provided as part of your use of the gym – for example, the frequency with which and the times at which you use the gym including the classes that you attend;
- data provided as part of your use of Stronghold MMA'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 gym 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 Health Check Questionnaire.

3. What do you do with this data?

We use and disclose your personal data to provide you with to the gym, and to offer you other Stronghold MMA 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 Stronghold MMA 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 gym access;
- protecting you and Stronghold MMA 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 your 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?

Stronghold MMA 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 Stronghold MMA 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 Stronghold MMA 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 Stronghold MMA – for example, disclosure to a Court in the event of legal action to which Stronghold MMA 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 Stronghold MMA?

Stronghold MMA 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 Stronghold MMA staff team on sgstronghold@gmail.com or by speaking to a receptionist at the gym.

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

Our website is designed to give you useful information about Stronghold MMA. 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. Stronghold MMA 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 Stronghold MMA'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 Stronghold MMA on sgstronghold@gmail.com. We aim to respond to most requests within 14 days, or if the request is more detailed, within 30 days. Stronghold MMA 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 Stronghold MMA has about me secure?

Stronghold MMA endeavours to take all reasonable steps to keep your personal data secure. 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 Stronghold MMA site?

Stronghold MMA provides links to some other websites outside Stronghold MMA. 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 Stronghold MMA 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 Stronghold MMA 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 Stronghold MMA business changes?

In the unlikely event that ownership of part or all of the Stronghold MMA 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 Stronghold MMA staff team on sgstronghold@gmail.com. If Stronghold MMA 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. Stronghold MMA 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 2019