



THE SINGAPORE ISLAND COUNTRY CLUB PRIVACY POLICY

LAST REVIEWED: 14 May 2026

This is the privacy policy ("**Policy**") of The Singapore Island Country Club ("**SICC**" or "**we**" or "**our**" or "**us**").

We take your privacy very seriously and have in place policies and practices dealing with data protection. We ask that you read this Policy carefully as it contains important information about our collection, use, processing and disclosure of personal data in our possession or under our control, including information on:

- i) our policies and practices for meeting our obligations under laws, regulations and guidelines which concern data protection;
- ii) how you may access, correct or make other requests in relation to your personal data in our possession or control as permitted by applicable laws; and
- iii) details of our data protection complaints procedure.

1. COLLECTION OF PERSONAL DATA

1.1 Personal data that SICC collects include names, residential address, email address, telephone number, nationality, gender, date of birth, marital status, images, golf handicap and index and other relevant information in order for us to provide products and/or services and to share information that may be of interest.

1.2 Personal data may be collected by us, directly or indirectly, for instance:

- 1.2.1** when you respond to our promotions, or subscribe to our mailing lists;
- 1.2.2** when you attend events organised by us;
- 1.2.3** when you visit our websites;
- 1.2.4** when your images are captured by us via CCTV cameras while you are within our premises, or when photographs or videos of you are taken when you attend our events;
- 1.2.5** when you use our services or enter into transactions with us, or express any interest in doing so;
- 1.2.6** when you communicate with us by telephone, email, via our website or through other communication channels including social media platforms;
- 1.2.7** when we seek information about you and receive your personal data in connection with your relationship with us;
- 1.2.8** when you submit any forms, applications or registrations to us when using our services;



- 1.2.9 when you sign up for online accounts for the booking of golf slots, facilities, events and submission of scores to the Singapore Golf Association; and/or
- 1.2.10 when you submit your personal data to us for any reason.
- 1.3 We also collect personal data from third party sources, for example:
 - 1.3.1 from our business partners and third party service providers who provide advertising, marketing or promotional services to SICC;
 - 1.3.2 from your family members or friends who provide your personal data to SICC on your behalf;
 - 1.3.3 from public agencies or other public sources.
- 1.4 In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes, including all purposes as set out in this Policy.

2. PURPOSES OF COLLECTION, USE OR DISCLOSURE

- 2.1 We may collect, use, process, store and/or disclose your personal data for one or more of the following purposes:

Membership

- 2.1.1 processing your membership application;
- 2.1.2 administering your membership with us;
- 2.1.3 facilitating the services, products, rewards, discounts, promotions, offers and other benefits ("**Benefits**"), offered by us or third party service providers, partners or merchants;
- 2.1.4 sending information about Benefits, circulars, correspondence, statements, invoices, notices, annual reports, minutes and other matters relating to membership;
- 2.1.5 processing payment of membership, facilities booking and other related fees;
- 2.1.6 coordinating meetings and other events;
- 2.1.7 implementing physical and IT security measures, including CCTV and parking access;

Support and assistance

- 2.1.8 to facilitate customer service, your requests, and to respond to any enquiries submitted by you or on your behalf;
- 2.1.9 to investigate and rectify technical issues;



- 2.1.10 conduct feedback, analysis and development activities to improve your experience;

Food & beverage privileges and events

- 2.1.11 if you have ordered wine or whisky, for us or third party service providers, partners or merchants to invite you for wine and whisky social nights and other events which we think you might be interested in;
- 2.1.12 to facilitate home deliveries with third party delivery service providers;

General

- 2.1.13 to verify your identity;
- 2.1.14 to conduct and complete transactions (e.g. processing orders and payments; providing products or services that have been requested), performing our obligations or exercising our rights as set out in binding contractual terms, and otherwise to manage your relationship with us;
- 2.1.15 to provide customer service (e.g. providing information on status and updates);
- 2.1.16 to process payments or credit transactions;
- 2.1.17 to respond to queries or requests;
- 2.1.18 to conduct surveys, research and analysis to improve our products and/or services;
- 2.1.19 to respond to legal processes or to comply generally with any applicable laws, governmental or regulatory requirements of any relevant jurisdiction (and any applicable rules, codes of practice or guidelines), and requests of any governmental or other regulatory authority with jurisdiction over us, including, without limitation, meeting requirements to disclose under the requirements of any applicable law, assisting in law enforcement and investigations by relevant authorities, conducting audit checks or surveillance and investigation, whether in Singapore or elsewhere;
- 2.1.20 security, safety and surveillance purposes in connection with our premises or events organised by us, including for the purposes of any SICC disciplinary tribunal proceedings;
- 2.1.21 to conduct audits and assessments on risk management;
- 2.1.22 to administer SICC rules, bye-laws and policies;
- 2.1.23 such purposes that may be informed to you when your personal data is collected;
- 2.1.24 any other reasonable purposes related to the aforesaid or for which you have provided any information to us; and/or
- 2.1.25 any other incidental business purposes related to or in connection with the above.



2.2 We may also collect, use, process, store and/or disclose personal data for purposes related to for which you have provided the personal data, in circumstances other than set out in this Policy where required, or permitted, by laws applicable to us or in any relevant jurisdiction, or where we have obtained your consent through other means (for example, pursuant to notices at our premises).

2.3 The purposes listed in the above clauses may continue to apply even in situations where your relationship with us has been terminated or altered in any way (for example, where we use personal data to enforce our rights under a contract with you).

3. THIRD PARTY'S WHO MAY BE PROVIDED WITH PERSONAL DATA

3.1 SICC may disclose your personal data to the following, whether located within or outside Singapore, for the purposes set out or otherwise referred to in this Policy:

3.1.1 third parties to whom you authorise SICC's disclosure of your personal data (through this Policy or otherwise);

3.1.2 reciprocal and affiliated clubs of SICC, in circumstances relating to your use of their facilities or premises or to confirm your SICC membership;

3.1.3 SICC's auditors, professional consultants, lawyers and other advisors;

3.1.4 SICC's business partners;

3.1.5 SICC's service providers or agents;

3.1.6 insurers, credit providers, courts, tribunals, law enforcement agencies, regulatory authorities and other governmental agencies as agreed or authorised by law; and

3.1.7 credit reporting or reference agencies or investigators.

4. ACCURACY

4.1 We generally rely on the accuracy of personal data provided by you or your authorised representatives. In order to ensure that our records of your personal data is current, complete and accurate, please update us if there are changes to your personal data by writing to our Data Protection Officer at the contact details at the end of this Policy.

5. COOKIES AND WEBSITE TRACKING

5.1 When you visit our websites or forums, please note that we may use cookies and similar tracking mechanisms and devices, for purposes such as monitoring the number of times you visit the websites, which pages you go to, and how long you spend browsing each page. Data we may collect include device information, identifier address, IP address and operating system used. This information helps us build a profile of users and improve our websites and other products and services, and track any potential use of bots or automated programming on our websites. Where data is only used on an aggregated basis, we will be unable to identify any particular individual, and we generally track on per-device basis.

6. OTHER WEBSITES

- 6.1** Our websites may contain links to other websites. However, this Policy only applies to SICC, and if you visit other websites, including through such links, different privacy policies will apply.

7. SECURITY AND RETENTION

- 7.1** To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, and loss of any storage medium or device on which your personal data is stored, we have introduced appropriate administrative, physical and technical measures, including to protect personal data from unintended access.
- 7.2** You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure, and SICC cannot and does not guarantee that our systems or applications are invulnerable to security breaches. SICC makes no warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities.
- 7.3** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. In some circumstances, we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

8. YOUR RIGHTS

- 8.1** If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, (b) a correction request to correct or update any of your personal data which we hold about you, or (c) other request in relation to your personal data, as permitted by applicable data protection laws, you may submit your request by contacting the Data Protection Officer.
- 8.2** If you wish to exercise your rights, please contact the Data Protection Officer. You may be required to submit certain forms or provide certain information in order for your request to be processed. Where permitted by law, SICC may charge you a reasonable fee to process your request, and will inform you of the fee before processing your request.
- 8.3** We will respond to your request as soon as reasonably possible, and in accordance with applicable law.

9. CONSENT WITHDRAWALS

- 9.1** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you. You may withdraw consent and request us to stop using and/or disclosing your personal data by submitting a request in writing to our Data Protection Officer at the contact details provided below.
- 9.2** Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to



the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

9.3 If you withdraw your consent to any or all use of your personal data or do not consent to the collection of your personal data by us, we may not be able to provide or continue providing you with products and/or services which you have requested and such withdrawal may also constitute a termination event which results in legal consequences such as forfeiture of deposits. You understand and agree that in such instances where SICC requires your personal data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant personal data for those purposes, SICC cannot be held liable for breach of that agreement. SICC's legal rights and remedies in such event are expressly reserved.

9.4 Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws in any jurisdiction.

10. COMPLAINTS HANDLING

10.1 Any individual may lodge a complaint with SICC in relation to the collection, use, disclosure, retention or protection of personal data in SICC's possession or under its control.

10.2 If you wish to lodge a complaint, you may do so by contacting SICC's Data Protection Officer at the contact details set out below. Where a complaint is made verbally to any staff member, such staff member will document the complaint and escalate it to the Data Protection Officer.

10.3 Upon receipt of a complaint, SICC will acknowledge the complaint within a reasonable period and may request for further information or clarification where necessary in order to process and investigate the complaint.

10.4 The Data Protection Officer will review and investigate the complaint, which may include engaging the relevant department(s) and reviewing any relevant records, systems or processes. All relevant departments shall cooperate and provide the information required for the purposes of such review and investigation.

10.5 SICC will use reasonable endeavours to respond to the complaint within a reasonable timeframe, taking into account the nature and complexity of the complaint. Where additional time is required, SICC will inform you accordingly.

10.6 Where appropriate, SICC may take such steps as it considers necessary to address the complaint, including providing clarification, correcting or updating personal data, ceasing the collection, use or disclosure of personal data, or implementing internal corrective measures.

10.7 SICC may maintain records of complaints and related investigations for such period as may be required for business, legal or regulatory purposes.

10.8 Nothing in this section shall affect any rights which you may have under applicable laws, including the right to refer the matter to the Personal Data Protection Commission.

11. CHANGES TO THIS POLICY

11.1 We keep this Policy under regular review. If we change this Policy we will post the changes on [<https://gis.sicc.org.sg>], so that you may be aware of the information we collect and how we use it at all times.

11.2 Where you continue to provide personal data to us as described in this Policy, or continue to



use our products or services, this will constitute your acknowledgement and acceptance of a revised Policy.

12. HOW TO CONTACT US / DATA PROTECTION OFFICER DETAILS

- 12.1** If you have any queries or comments on this Policy or the use of your personal data, or if you wish to lodge a privacy-related complaint, please contact SICC's Data Protection Officer at:

Data Protection Officer

Email address: **DPO@sicc.org.sg**

SICC will investigate your queries, comments or complaint, and will use reasonable endeavours to respond, in accordance with applicable laws.