



FLOENERGY.SG

# Privacy Policy

Last updated 05 April 2021





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**Flo Energy**  
**Singapore Pte. Ltd.**  
UEN/GST Reg No  
202006009E  
Retail License  
EMA/RE/041

55B Amoy Street  
Singapore 069881

+65 6223 1000  
hello@floenergy.sg  
www.floenergy.sg

Operating Hours:  
Mon–Fri: 9am–6pm  
Closed on Sat, Sun & PH

# Privacy Policy

Flo Energy Singapore Pte Ltd (UEN No. 202006009E) ("**we**", "**us**" or "**our**") respects the privacy of all users of our website and services.

## 1. What does this Policy Cover?

- 1.1. This Privacy Policy explains to you how we collect, use, disclose, store and process data that is capable of identifying you as an individual, whether on its own or in conjunction with other data accessible by us ("**Personal Data**").
- 1.2. By accessing our website and using our services, communicating with us (whether by e-mail, telephone, writing, or otherwise) or providing us with your Personal Data, you consent and agree to us collecting, using, disclosing, storing and processing your Personal Data in the manner described in this Privacy Policy.

## 2. Collection of Personal Data

- 2.1. We only collect, use and disclose Personal Data with your consent or deemed consent or as otherwise permitted under the Personal Data Protection Act 2012 ("**PDPA**") or other applicable laws and regulations.
- 2.2. For us to provide services requested by you, it is necessary for us to collect, use and disclose certain Personal Data.
- 2.3. Depending on the nature of your interaction with us, some examples of Personal Data which we may collect from you include:
  - (a) identity data, including your name and identification number(s) (e.g. NRIC number);
  - (b) login credentials (e.g. username and passwords);
  - (c) contact information, including your e-mail address, phone number and mailing address;
  - (d) transaction data, including your credit card details and billing address;
  - (e) records of your communications with us; and
  - (f) usage data relating to how you use our website.
- 2.4. We generally do not collect your Personal Data unless:
  - (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Data to us (your "**authorised representative**") after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your Personal Data for those purposes; or
  - (b) collection and use of your Personal Data without consent is permitted or required by the PDPA or other laws.
- 2.5. When you use our website, we may automatically collect certain data through the use of website cookies. Please refer to our Cookie Policy (Can be downloaded from the Flo Energy website) for more information about how we use cookies to collect your information.
- 2.6. We shall seek your consent before collecting any additional Personal Data and before using your Personal Data for a purpose which has not been notified to you (except where permitted or authorised by law).
- 2.7. We do not knowingly collect Personal Data from children under the age of 13. Should you be under the age of 13, please do not provide Personal Data of any kind whatsoever. If a child under the age of 13 provides us with Personal Data, a parent or guardian of that child may request to have this information deleted from our records by submitting a written request to our Data Protection Officer at [DPO@floenergy.sg](mailto:DPO@floenergy.sg).

## 3. Use of Personal Data

We may collect and use your Personal Data for any or all of the following purposes:

- 3.1. First, we may use your Personal Data for any or all of the following purposes:
  - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you;
  - (b) verifying your identity;
  - (c) processing payment or credit transactions (including credit checks if required);
  - (d) to facilitate the operation of a retail electricity market or a wholesale electricity market;





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- (e) managing your relationship with us;
- (f) to improve our services;
- (g) to comply with applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
- (h) to respond to, handle, and process queries, requests, applications, complaints, and feedback from you;
- (i) to enforce our contractual rights (including debt recovery), resolve disputes, pursue available remedies or limit the damages that we may sustain;
- (j) for any other purposes for which you have provided the information;
- (k) to respond to an emergency, or otherwise to protect the rights, property, safety or security of third parties and visitors to our website or to the public;
- (l) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
- (m) for any other incidental business purposes related to or in connection with the above.

3.2. Second, where you have consented to receive marketing or promotional information or materials from our affiliates, they may use your Personal Data in one or more of the following ways:

- (a) to collect, retain, use, process and disclose your Personal Data where reasonably necessary for purposes consented by you;
- (b) to update their records of your Personal Data;
- (c) to monitor your access to and use of our website and services;
- (d) to contact you by telephone, facsimile and/or e-mail; and/or
- (e) to advise you of products and services which may be of interest to you.

3.3. We will only use your Personal Data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If there is any change in the purpose for which we collected your Personal Data, we will inform you of such change by way of e-mail via your e-mail address on our records. If you wish to have an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Protection Officer at [DPO@floenergy.sg](mailto:DPO@floenergy.sg). If we need to use your Personal Data for an unrelated purpose, we will notify you and explain the legal basis, which allows us to do so.

3.4. Please note that Personal Data does not include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person. We may (but not in a manner that would identify you personally) use anonymised or aggregated data derived from your Personal Data and/or disclose such data to advertisers, business partners, sponsors and other third parties for their use, to customise or improve our content and advertising to deliver a better experience to users.

## 4. Disclosure of Personal Data

4.1. We may disclose your Personal Data:

- (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you;
- (b) to third-party service providers, agents and other organisations we have engaged to perform any of the functions in Clause 3.1 for us;
- (c) for the purpose(s) for which it was collected; and/or
- (d) where such disclosure is permitted or required under the PDPA or any other applicable law.

4.2. To safeguard your Personal Data, we disclose Personal Data both internally and to third parties (including our authorised third-party service providers and agents) only on a need-to-know basis. We expect all parties to whom we disclose your Personal Data to respect the security of your Personal Data and to treat it in accordance with the law.

## 5. Retention of Information

5.1. We may retain your Personal Data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

5.2. We will cease to retain your Personal Data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the Personal Data was collected, and is no longer necessary for legal or business purposes.



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## 6. Accuracy and Correction of Personal Data

- 6.1. We generally rely on Personal Data provided by you (or your authorised representative). In order to ensure that your Personal Data is current, complete and accurate, please promptly update us if there are changes to your Personal Data by informing our Data Protection Officer in writing or via e-mail at [DPO@floenergy.sg](mailto:DPO@floenergy.sg). We shall handle such requests as soon as reasonably practicable.
- 6.2. We reserve the right to disregard or correct information which seems, on a reasonable basis, to be inaccurate or out of date by reason of the time which has elapsed since it was collected or by reason of any other information in our possession.
- 6.3. Should we disagree and reject your written request for a correction of your Personal Data on reasonable grounds, we shall annotate the Personal Data with the correction that was requested but not made.

## 7. Access to Personal Data

- 7.1. 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, or (b) a correction request to correct or update any of your Personal Data which we hold about you, you may submit your request in writing or via e-mail to our Data Protection Officer [DPO@floenergy.sg](mailto:DPO@floenergy.sg).
- 7.2. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any Personal Data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).
- 7.3. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

## 8. Transfer of Personal Data outside Singapore

- 8.1. We generally do not transfer your Personal Data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

## 9. Security

- 9.1. To safeguard your Personal Data 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, encryption, and disclosing Personal Data both internally and to our authorised third-party service providers and agents only on a need-to-know basis.
- 9.2. 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.
- 9.3. If you use a login user ID or password obtained through the website, you shall be responsible for maintaining the confidentiality of the user ID and password and not to share or authorise the use of the user ID and password by third-parties. You shall be responsible for all activities undertaken using your user ID and password whether authorised or otherwise. You shall immediately notify us if it comes to your knowledge that your user ID and/or password has been compromised or there has been unauthorised use.

## 10. Withdrawal of Consent

- 10.1. You may choose whether or not to provide your Personal Data, and if already provided, you may choose to exercise your right to withdraw the consent you provided for the use or disclosure of your Personal Data as provided by the PDPA.
- 10.2. You may withdraw your consent for the collection, use or disclosure of your Personal Data, by giving us a written request made by e-mail to our Data Protection Officer at [DPO@floenergy.sg](mailto:DPO@floenergy.sg).



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- 10.3. 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.
- 10.4. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in **Clause 10.2** above.
- 10.5. 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.
- 10.6. Please note that your consent given here will override any registration on the Do Not Call Registry and shall apply to Singapore telephone numbers under your name (including your employee, representative or authorised person), including new telephone numbers which you may provide us from time to time. You may opt-out of receiving marketing communications from us and our affiliates using the opt-out facility provided by us, or giving us a written request made by e-mail to our Data Protection Officer at [DPO@floenergy.sg](mailto:DPO@floenergy.sg).

## 11. Links to Other Sites

- 11.1. Our website may contain links to or from other websites. This Privacy Policy is not applicable to Personal Data collected on third-party websites.
- 11.2. We are not responsible for the privacy policies, statements and practices of other third-party websites even if you accessed the third-party website through links from our website or you linked to our website from a third-party website. We encourage you to read the privacy policies of such third-party websites for information on how they collect, use and/or disclose your information.

## 12. Limitation of Liability

- 12.1. We, and our related companies and affiliates, are not liable for any direct, indirect, special or consequential damages or loss of any kind resulting from:
  - (a) any unauthorised use of your user ID and/or password;
  - (b) your access to and/or use of our website and/or any online services; and/or
  - (c) your non-compliance with this Privacy Policy.

## 13. Changes to our Privacy Policy

- 13.1. We may revise this Privacy Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Privacy Policy was last updated. Your continued use of our website or services constitutes your acknowledgement and acceptance of such changes.
- 13.2. This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.

## 14. Contact Us

- 14.1. If you have any comments, questions or complaints about our Privacy Policy or about our collection, use and/or disclosure of your Personal Data, you may contact our Data Protection Officer at [DPO@floenergy.sg](mailto:DPO@floenergy.sg).

Effective date: 05/04/2021

Last updated: 05/04/2021

