



PRIVACY POLICY

This Privacy Policy ("Policy") sets out the basis which FLOWER MEISTER INTERNATIONAL ("we", "us", "our", "FMI", "Platform") may collect, use, disclose or otherwise process personal data of our customers (vendors and merchants) and contractors.

FMI functions as a "business-to-business" electronic market place and generally does not collect personal data as part of its operations. All data provided are treated as business contact information.

However, we do respect the privacy and confidentiality of any personal data of our customers and contractors inadvertently collected in the course of providing our services and we are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data entrusted to us.

This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged through our business processes.

This Privacy Policy should be read in conjunction with country-specific jurisdictions of each FMI entity controlling your personal data:

Singapore: Otani Trading Pte Ltd

Japan: Otani Trading, Ltd.

Vietnam: Otani U.P., Co. Ltd.

PERSONAL DATA

1. As used in this Policy:

"customer" means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

"personal data" means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

2. We generally do not collect your personal data unless 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



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).

3. We may collect and 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) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - d) processing payment or credit transactions;
 - e) complying with any 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;
 - f) transmitting to any unaffiliated third parties including our third party service providers and agents, and relevant governmental and/or regulatory authorities, and
 - g) any other incidental business purposes related to or in connection with the above.

We may from time to time use "cookies" or other features to allow us or third parties to collect or share information in connection with your use of our platform. These features help us improve our platform and services we offer, or help us offer new services and features.

"Cookies" are identifiers that are stored on your computer or mobile device that record data about computer or device, how and when the services or platform are used or visited, by how many people and other activity within our platform. We may link cookie information to personal data. Cookies also link to information regarding what items you have selected and web pages you have viewed. This information is used to keep track of your shopping cart, to deliver content specific to your interests, to conduct data analysis and to monitor usage of the services.

You may refuse the use of cookies by selecting the appropriate settings on your browser or device. However, please note that if you do this you may not be able to use the full functionality of our platform.

4. 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; or
 - b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above mentioned purposes.

WITHDRAWING YOUR CONSENT

5. 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 in writing. You may withdraw consent

and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.

6. 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 fourteen (14) business days of receiving it.
7. 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.
8. 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.

ACCESS TO AND CORRECTION OF PERSONAL DATA

9. 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 email to our Data Protection Officer at the contact details provided below.
10. We will respond to your request as soon as reasonably possible. In general, our response will be within fourteen (14) business days. 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.

PROTECTION OF PERSONAL DATA

11. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have implemented appropriate administrative, physical and technical measures and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.
12. 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.

ACCURACY OF PERSONAL DATA



13. 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 update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

RETENTION OF PERSONAL DATA

14. 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.
15. 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.

TRANSFERS OF PERSONAL DATA

16. The information collected from you may be transferred, stored, and processed in the country of each FMI entity. By using our services, you authorize us to use your information in countries where we operate for the purposes mentioned above.
17. We will ensure that your information is transferred in accordance with this Privacy Policy and protected in accordance with applicable laws on personal data protection in countries of each FMI entity.

DATA PROTECTION OFFICER

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, at the following:

Data Protection Officer
Otani Trading Pte Ltd
16 Raffles Quay
#33-03 Hong Leong Building
Singapore 048581
Email: sg-dpo@otani-trading.com

CHANGES TO POLICY

This 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.



We may revise this 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 Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Last updated: 10 February 2021