

VIRGIN ACTIVE SINGAPORE PRIVACY POLICY

Virgin Active knows that you care how information about you is used and shared and we appreciate your trust in us to do that carefully and sensibly. This policy describes the types of personal data that we may collect about you, the purposes for which we use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy.

THE POLICY

As used throughout this policy, the term "Virgin Active" refers to **Virgin Active Singapore Pte Ltd**, Company Registration Number 201219030N ("**Virgin Active Singapore**", "**we**", "**our**" and "**us**"), the Virgin Active Group and its affiliates worldwide. Virgin Active Singapore is bound by the *Personal Data Protection Act 2012* ("**PDPA**") and by other applicable laws which govern privacy. We may amend or update our Privacy Policy at any time and will publish any updated policy on the Virgin Active Singapore website. We encourage you to check the Virgin Active Singapore website regularly to ensure that you are aware of the terms of our current Privacy Policy.

This Privacy Policy explains how and why we collect, use, disclose, protect, retain and otherwise process personal data. Where the PDPA requires consent, we will notify you of the relevant purposes and obtain or rely on consent, (including deemed consent) in accordance with the PDPA. In other circumstances, we may process personal data without consent where the PDPA or another applicable law authorises or requires us to do so.

1. WHAT PERSONAL DATA ABOUT YOU DOES VIRGIN ACTIVE SINGAPORE COLLECT?

We collect personal data that is reasonably necessary for our stated purposes. Depending on your relationship and interactions with us, this may include: identity and contact details; date of birth and age-verification information; preferred communications; corporate

membership and employer details; membership and transaction records; payment and billing details (which may be handled by payment service providers); club-entry, booking, attendance and product-use records; photographs used for membership and identity verification; CCTV footage; correspondence and survey responses; online identifiers, device, cookie, location and website-use data; marketing preferences; recruitment and employment-related information; and health, fitness, nutrition, injury, accessibility or emergency information that you choose or need to provide. We may also hold information about joint members, family members and individuals under 18 where relevant.

We may also collect the following information:

- **General personal data and contact information**

Name, age, gender, photograph (profile picture), voice recordings, video recordings (including CCTV footage), address, phone number, email address, preferred communication methods, signature, credit card information, payment channel information.

- **Personal data from persons under 18**

Where a member or participant is under 18, we may collect personal data needed to administer the membership, provide services, manage safety and safeguarding, and meet legal obligations. We will seek consent from a parent or legal guardian where the child cannot validly give consent or where parental or guardian consent is otherwise appropriate. Parents and guardians should not permit children to submit personal data to us without appropriate supervision.

- **Photographs for Membership Profile and ID Confirmation**

In the interests of security and the prevention of crime, we take a digital photograph of each member to whom a membership is issued including our under 18-year-old members. By providing the digital photograph to us, you are consenting to our using it in the manner set out

in this Privacy Policy. If you qualify for a corporate or age limit membership, we may copy your corporate ID or part of your personal ID card to confirm your age or employment status.

- **Contacting us via Website or otherwise**

When you use the www.virginactive.com.sg website ("**Our Site**") or contact us by post, telephone, fax, WhatsApp, email or SMS, we collect, store and use certain personal data that you disclose to us. This includes details such as your name, address, telephone, fax, email, mobile phone number and WhatsApp profile as well as traffic data, location data, web logs and other communication data, whether this is required for our own billing purposes, for marketing activities or other resources that you access. If you contact us, we may keep a record of that correspondence and if you have enquired about our products, we may contact you to market our products unless you opt out of marketing communications (by sending an email to privacy@virginactive.com.sg).

- **CCTV**

We use CCTV in our clubs for safety, security, incident management and crime prevention. Appropriate notices are displayed where practicable. Access to footage is restricted, and footage is retained only for the applicable period in section 6 unless it is needed for an incident, investigation, claim or legal requirement.

- **Surveys**

We may invite you to complete surveys for feedback, service improvement and research. Participation is voluntary unless we tell you otherwise. We may aggregate or anonymise survey results where reasonably possible.

- **Online portals and profile**

We may also collect and use the personal data you provide while using our online portals and any profile that you create while using our services including health, training and nutritional information.

- **Social media and third-party service providers**

We may also collect and use personal data you provide when interacting with us via social media, when you enter competitions, or when you participate in promotions or events. This information may be collected by us directly, or by a third party on our behalf, and may include your photos, comments and experiences you provide or share with us. If you provide personal data to us via third parties or social media platforms, your personal data will be managed in accordance with the privacy policy in use by that third party, in addition to our own Privacy Policy. If you share your contact information with us via Facebook, Instagram or other social media channel in response to a promotion by us, we may contact you to market our products unless you opt out of marketing communications (by sending an email to privacy@virginactive.com.sg).

- **Sensitive data**

The term "**sensitive data**" in this context refers to information related to your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information that is otherwise not health information, and biometric information or templates. Whilst we do not generally collect Sensitive data unless it is volunteered by you, we do specifically collect health and fitness information where reasonably needed to assess readiness for exercise, manage safety, accommodate needs or provide requested services, and we will notify you of the relevant purposes and obtain consent where required.

2. WHY DO WE COLLECT PERSONAL DATA FROM YOU AND HOW DO WE USE PERSONAL DATA?

The main types of personal data Virgin Active Singapore collects and the main purposes for which personal data is collected, used, held and disclosed are set out below:

- We use personal data to provide the services you request from Virgin Active such as to facilitate administration of your membership of the club, to manage our relationship with you, to communicate with you and assist you with queries and to facilitate bookings of classes and appointments with our own or third-party service providers and other transactions.
 - We also use personal data in order to provide and improve our services and operate our facilities (including as described above), or otherwise as required or authorised by law. For example, when an individual sends Virgin Active Singapore a query, we will use the individual's personal data for the purposes for which the individual provided it.
 - We may also use the information to advertise products and services, to carry out market data analysis so that we can continue to deliver enhanced services and facilities, to process payments and maintain accounts and records, to prevent crime and aid in the prosecution of offenders, to comply with the law, and to administer and maintain membership records. In addition, we use this information to improve our platform, prevent or detect fraud or abuses of our website and enable third parties to carry out technical, logistical or other functions on our behalf. As part of conducting our business, personal data may also be used to maintain and develop our business systems, including testing and upgrading them.
 - We also use your details to send you newsletters and promotions, and to conduct online surveys or surveys by telephone; prize draws; competitions and other promotions via email, social media, telephone, WhatsApp or post. We will also use the information in the course of collecting your membership fees and any other payments that may be due to us from you. If you apply for employment at Virgin Active, we use the personal data you supply to process your job application. This Privacy Policy does not apply to acts and practices in relation to employee records of our current and former employees, which are exempt from the PDPA and are covered by a separate policy.
 - We use health information provided by you so that we can assess your general health, wellbeing and your readiness for physical exercise. If we need to collect Sensitive data (such as health information), we will not collect that information unless we have first obtained your consent.
 - We may also invite you to set up a profile with our preferred personalised wellness tracking system provider. This profile will only be set up with your consent.
 - We use social media platforms to undertake marketing activities to offer you products and services that we legitimately feel may be of interest to you, to generate leads and to drive traffic to our website. To do this we may use limited personal data of yours, such as your email address, with social media platforms. We do not control how social media platforms use your personal data so please be sure to direct any questions around how your social media platforms use or store your personal data to that social media platform. You may opt out of these marketing activities at any time by sending an email to privacy@virginactive.com.sg.
 - We use your personal data to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to your membership with us or any other matter arising from your membership with us, and whether there is any suspicion of the same.
 - We may also use your personal data to comply with legal and regulatory requirements, including any law enforcement requests and/or any requests by governmental or regulatory authorities having jurisdiction over us.
- Other than as set out in this Privacy Policy we will not share your personal data with third parties for marketing or any other purposes without your consent, unless we are required to do so by law. We operate an automatic opt-in policy which means that when you request

information from us on one of our clubs or make an enquiry, we add you to our database.

3. IN WHAT CIRCUMSTANCES MAY VIRGIN ACTIVE SINGAPORE DISCLOSE PERSONAL DATA?

Information about our club users is an important part of our business and we do not sell it to others. Virgin Active Singapore discloses member information in connection with the purposes outlined in this Privacy Policy. We only disclose personal data as described below and with our group companies which are either subject to this Privacy Policy or follow practices at least as protective as those described in this Privacy Policy.

Our personnel (including our employees and contractors):

Our personnel have access to personal data to the extent that they need to access your personal data in connection with their duties and your membership.

Third party service providers:

We employ other companies and individuals to perform functions on our behalf. Examples include our banking services, sending postal mail and e-mail, removing repetitive information from member lists, analysing data, managing marketing promotions or competitions and providing marketing assistance. We also use third party information technology service providers for the purposes of hosting, storing and securing information and data. Third party service providers have access to personal data needed to perform their functions but may not use it for other purposes. Further, they must process the personal data in accordance with this Privacy Policy and as permitted by the PDPA.

Promotional offers:

Sometimes we send offers to club users on behalf of other businesses. When we do this, we do not give that business your name and address or any of your health information or other sensitive information. Please tick the opt-out box in your terms and conditions, or let us

know in writing, if you don't want to receive marketing communications.

Business transfers:

As we continue to develop our business, we might sell or buy health clubs or subsidiaries or business units. In such transactions, member information generally is one of the transferred business assets but remains subject to the promises made in any pre-existing Privacy Policy (unless, of course, the member consents otherwise). Also, in the event that Virgin Active or substantially all of its assets are acquired, personal data will of course be one of the transferred assets.

Personal data transfers outside of Singapore:

We may transfer personal data outside Singapore to Virgin Active group companies and service providers for the purposes set out in this Privacy Policy. Before making a transfer, we take appropriate steps to ensure that the recipient is bound by legally enforceable obligations to provide a standard of protection comparable to the PDPA, or that another transfer mechanism or exception permitted by the PDPA applies. These steps may include contractual protections, due diligence, security controls and ongoing oversight.

Personalised wellness tracking system:

If you are invited to set up a profile with our preferred personalised wellness tracking system provider and only if you consent to set up a profile, we will share your contact details and whether you are male or female with this provider. Any information you share with this provider will be subject to the privacy policy of the provider and we will not have any control over information on the provider's website or system.

Protection of Virgin Active and others:

We release account and other personal data when we believe release is appropriate to comply with the law; enforce or apply our membership or other agreements; or protect the rights, property or safety of Virgin Active, our users or others. This includes exchanging information with other companies and

organisations (including credit reporting agencies) for fraud protection and credit risk reduction and with police or other government authorities. Obviously, however, this does not include selling, sharing or otherwise disclosing personally identifiable information from members for commercial purposes in a way that is contrary to the commitments made in this Privacy Policy. With your consent, other than as set out above, you will receive notice when information about you might go to third parties and you will have an opportunity to choose not to share the information.

4. WHAT ABOUT COOKIES?

Cookies are alphanumeric identifiers that we transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser and to automatically collect information from your computer such as your IP address and other details about your computer which are automatically collected by our web server, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns and does not identify any individual.

The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether. Additionally, you can disable or delete similar data used by browser add-ons, such as Flash cookies, by changing the add-on's settings or visiting the website of its manufacturer. However, because cookies allow you to take advantage of some of Virgin Active's essential features, we recommend that you leave them turned on.

If you do leave cookies turned on, be sure to sign off when you finish using a shared computer.

Please note that our advertisers may also use cookies, over which we have no control:

- To estimate our audience size and usage pattern.

- To store information about your preferences and so allow us to customise Our Site according to your individual interests.
- To speed up your searches.
- To recognise you when you return to Our Site.

5. HOW DO WE PROTECT PERSONAL DATA?

Virgin Active endeavours to take all reasonable steps in the circumstances to protect your personal data from misuse, interference and loss, and from unauthorised access, modification or disclosure. We ensure that our security measures comply with the minimum-security standards prescribed under the PDPA.

We maintain physical, electronic, technical, organisational and procedural safeguards for personal data to help ensure the confidentiality, integrity and availability of personal data, and to prevent unauthorised access, use, alteration or disclosure. We have established measures to control access to, and usage of, devices that store and process personal data, ensuring they are secure and appropriate for our data collection, use and disclosure practices.

We also enforce access restrictions by granting permissions on a need-to-know basis, limiting rights to authorised personnel, and defining user roles and responsibilities to prevent unauthorised access, disclosure, viewing, duplication or theft of devices used for personal data processing. These measures include user access management, such as registration and de-registration, audit trails, management of privileged accounts, safeguarding authentication credentials, regular reviews of access rights, and adjusting or removing permissions when necessary.

6. DATA RETENTION POLICY

We cease retaining documents containing personal data or remove the means by which the data can be associated with an individual, as soon as it is reasonable to assume that the purpose for which the data was collected is no longer served and retention is no longer

necessary for legal or business purposes. We periodically review retained data. Simply archiving data or restricting access does not, by itself, mean that we have ceased retention.

When retention ends, we securely delete, destroy, return or irreversibly anonymise the data, taking reasonable steps to make it irretrievable and inaccessible. Backup copies are deleted or overwritten in the ordinary backup cycle and remain protected and unavailable for routine use until then. Data may be kept longer where reasonably necessary for a complaint, incident, investigation, litigation hold, legal claim or legal obligation.

7. WHAT ABOUT LINKS TO OTHER WEBSITES?

Our site may include links to other websites. We do not provide any personally identifiable customer information to these advertisers or third-party websites.

These third-party websites may use technology to send (or “serve”) the advertisements that appear on our website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that they may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices.

8. WHAT CHOICES DO I HAVE?

As discussed above, you can always choose not to provide information however this may mean we cannot provide some or all of our services to you. If you do not want to receive e-mail or other mail from us, tick the opt-out box in your terms and conditions or let us know in writing if you don't want to receive these offers. However, please note, if you do not want to receive legal notices from us, such as this Privacy Policy, those notices will still govern your use of Virgin Active, and it is your responsibility to review them for changes.

You have the right to ask us not to process your personal data for marketing purposes by sending an email to the Virgin Active Data Protection Officer, whose details are set out in Section 12 below.

9. HOW CAN I ACCESS OR CORRECT MY PERSONAL DATA OR MAKE A COMPLAINT?

You may request access to the personal data we hold about you by contacting us using the details set out in Section 12 of this Privacy Policy. We will respond to any such request within a reasonable period. Although we will be able to provide you with most personal data we hold about you, in some circumstances it may not be possible for us to provide you with access to all of your personal data. Where this is the case, we will notify you and give you the reasons why, except to the extent it would be unreasonable for us to do so.

If you believe that any of the personal data we hold about you is inaccurate, incomplete or not up to date, you may contact us using the details set out in Section 12 below to request that we correct the information. Although we will take reasonable steps to ensure that the information is corrected, in some circumstances it will not be possible for us to correct your personal data in the manner you have requested. Where this is the case, we will notify you and give you the reasons why, except to the extent it would be unreasonable for us to do so.

If you wish to make a complaint about the way we have handled your personal data, including if you think we have breached the PDPA, you may do so by contacting us using the details set out in Section 12 below. If you make a complaint, please include contact details such as your name, address, telephone number and email address, and clearly describe your complaint. We will respond to your complaint within a reasonable period and will endeavour to resolve the issue in an efficient manner. If we are unable to resolve your complaint and you believe that we have breached the PDPA, you may wish to contact the Personal Data Protection Commission.

Under some circumstances, we may require you to prove your identity before complying

with data subject exercise of rights, for your own privacy and security.

10. DATA DELETION RIGHTS

You may request that we delete your personal data by contacting us using the details in Section 12. We will action your request within a reasonable period, generally within 30 days. Notwithstanding your request, we may retain certain information where required or permitted by law, for example, financial records for tax purposes or data needed to resolve an existing dispute. We will inform you if such exceptions apply and explain why.

11. NOTICES AND REVISIONS

Our business changes constantly and our Privacy Policy and the website terms and conditions will change also. We may e-mail periodic reminders of our notices and conditions, unless you have instructed us not to, but you should check our website frequently to see recent changes. Unless stated otherwise, our current Privacy Policy applies to all information that we have about you and your account. However, we stand behind the promises we make and will never materially change our policies and practices to make them less protective of member information collected in the past without the consent of affected members.

12. CONTACT

For further information about Virgin Active Singapore's privacy procedures and practices, or to request access to or correction of your personal data or make a complaint, please contact the Virgin Active Data Protection Officer using the following details:

Email: privacy@virginactive.com.sg

Address: Virgin Active Central,
Level 6, Tower 2
One Raffles Place,
Singapore, 048616

This Privacy Policy was last updated August 2026