

Added by [Terence Siew](#), last edited by [Terence Siew](#) on 09 Oct 2014

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Greenlots (known herein as the "Company") is a service provider for charging Electric Vehicles ("EV"). The Company provides both home charging installation services, and public charging services to owners of electric vehicles (known herein as the "Customer"). The Company outsources home charging installation to external partners or parties, also known herein as the "Contractor".

This article is based on the Singapore Personal Data Protection Act 2012 ("PDPA") for the following purposes:

- Establish the principles the Company follows when collecting, using, disclosing, retaining and removing personal data; and
- Describe other important topics relating to the Customer's privacy

The Company only collects, uses and discloses personal data with the Customer's consent or deemed consent or as otherwise permitted under the PDPA or other applicable laws and regulations.

1. Collection, Usage and Disclosure

1.1. Collection of Personal Data

Personal data will generally only be collected and used for the primary purposes of:

- Conducting, improving, maintaining and developing a business relationship;
- Processing, servicing or enforcing transactions and sending related communications;
- Identification and verification purposes in connection to any services that may be supplied to the Customer; and
- Responding to the Customer's queries

The types of personal data are as follows:

#	Personal Data	Collect via	Purpose for Collection	Disclosure	Access
1	Name	Official EV Distributors	Customer Identification	To Contractor	1) Greenlots (Full modification rights) 2) Official EV Distributors (Insertion of new entries and viewing existing entries only)
2	Mobile Number		Contact & Liaison	-	
3	Home Address		Necessary for site survey, installation, maintenance & servicing (home charging)	To Contractor	
4	Home Phone Number		Optional	-	
5	Work Address		Necessary for site survey, installation, maintenance & servicing (home charging)	To Contractor	
6	Email Address		1) Contact & Liaison 2) Registration for public charging	-	
7	Vehicle Identification Number		Customer Identification	-	
8	Last 4 digits of Credit Card		Customer Identification for public charging	-	
9	Energy Usage (charge session)	Greenlots	Billing Calculation for public charging	-	Greenlots

Table 1.1 - Personal Data Collection

Personal data of Customers is collected on behalf of the Company by representatives of official EV Distributors or by EV Showrooms, with the Customer's informed consent.

The information is then relayed to the Company via a secure digital form. All information are stored on highly regulated Cloud Service Provider with data protection & security compliance (Google Drive: FISMA, ISO 27001, SSAE-16, SOC 1, SOC 2, SOC 3 certifications).

1.2. Usage of Personal Data

The use of personal data is limited only to the purposes listed above in Table 1.1.

Personal data collected before the commencement of data protection requirements of the PDPA will be accorded with the same management rules as personal data collected after the commencement of PDPA.

1.3. Disclosure of Personal Data

Disclosure of personal data to any external parties is conducted in compliance with the Fourth Schedule of the Data Protection Bill (PDPA) 2012:

Paragraph 1(a) - the disclosure is necessary for any purpose which is clearly in the interests of the individual, if consent for its disclosure cannot be obtained in a timely way;

The Company will not:

- Share, sell, rent or release any personal data that it collects from the Customer;
- Disclose personal data for any secondary purposes unless consent has been given or if so permitted or required under the PDPA or other applicable laws and regulations; and
- Assume responsibility for any unauthorized use of your personal data by external parties which are wholly attributable to factors beyond our control;

1.4. External Parties

The Contractors whom we conduct business are only authorized to use your information to perform the service for which they were hired. As part of our agreement with them, they are required to follow the PDPA laws and policies that we provide, and to take reasonable measures to ensure your personal data is secure.

2. Customer Requests

2.1. Accuracy & Correction of Personal Data

The Company will:

- Take reasonable steps to ensure information is accurate and up-to-date by updating its records whenever changes to information come to its attention;
- Disregard information which seems, on a reasonable basis, 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 its possession;
- Comply with a Customer's request to correct his/her personal data as soon as practicable;
- Comply with a Customer's request to withdraw his/her consent for the collection, use or disclosure of personal data; and
- Destroy or dispose any unwanted or unsolicited data in a manner that protects the privacy of the Customer

2.2. Withdrawal of Consent

In the event of a withdrawal of consent, the Company shall inform the Customer of the likely consequences of the withdrawal of the consent. The Company will cease to collect, use or disclose the personal data upon withdrawal unless otherwise permitted or required by the PDPA or other applicable laws and regulations.

For Customers who wish to opt-out, the form for Withdrawal of Consent may be downloaded [here](#).

3. Overseas Transfer and Data Protection

3.1. Overseas Transfer

Personal data in electronic format provided to the Company may be transferred to, stored by an overseas recipient. For example, the Company may use a server hosted overseas to store data. When responding to a Customer's technical support, personal data may also be processed by the Company's employees operating outside of Singapore. In these cases, the data protection policy of the Company will be strictly adhered to at all times.

3.2. Data Protection

The Company will:

- Take reasonable steps to ensure that Personal Data is securely stored and managed;
- File Personal Data in hard-copy formats at secure locations within the office;
- Protect Personal Data in electronic formats from misuse or loss by restricting access to the information; and
- Ensure that customer records are periodically archived into access-limited directories to reduce overall exposure

As soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes, the personal data will be destroyed or rendered anonymous.

4. Do-Not-Call (DNC) Registry

The Company complies with all provisions regarding DNC Registry under the PDPA.

The DNC Registry, however, does not cover messages sent for other purposes, such as service calls or reminder messages sent by the Company to render services requested by the Customer.

5. Updates to Personal Data Policy

As part of the Company's efforts to ensure that personal data is properly managed and protected, the Company's policies and procedures will be reviewed from time to time.

A current version of this policy will be published on the Company's website or may be obtained upon request.

For more information or feedback about the Company's policy, please contact:

Operations Manager
Greenlots Singapore
52A Amoy Street, Singapore 069878

Email: sg_privacy@greenlots.com

Website: <http://greenlots.com/privacy-policy/>

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None
