

Alipay Singapore E-Commerce Private Limited

Privacy Notice

(Updated as of December, 2019)

This **Privacy Notice to Users of Alipay Services** applies to our users of our Alipay Services (**Users**) and other relevant individuals worldwide, including:

- each individual who is a registered member of a merchant site, and who makes online purchase or sale from the merchant site using Alipay Services (as defined below); and
- each merchant being a sole trader or an entity who buys or sells products or services on a merchant site using Alipay Services (as defined below) and provides personal data to Alipay in the process thereof.

The term “merchant site” means any web-based marketplace platform to which our website is linked (each a **merchant site**), including:

- <http://www.aliexpress.com> and/or its corresponding mobile application
- <http://wholesale.alibaba.com> and/or its corresponding mobile application
- <http://www.tmall.hk> and/or its corresponding mobile application
- <http://www.alibabacloud.com> and/or its corresponding mobile application
- <http://www.taobao.com> and/or its corresponding mobile application
- <http://www.tmall.com> and/or its corresponding mobile application

Alipay Services are services provided by us and our affiliates (collectively, referred to as the **Alipay Group**) to facilitate payments in connection with certain online transactions on these merchant sites and are only available to registered members of the merchant sites. Unless otherwise indicated or the context requires otherwise, reference to “you” or “your” are intended to refer to a User, and reference to “Alipay”, “we”, “us” or “our” in this Notice and the Agreements include relevant companies in the Alipay Group that are involved in providing the Alipay Services (each an “Affiliate” or member of the “Alipay Group”).

Please see [here](#) our terms and conditions for the Alipay Services, which may contain additional terms regarding privacy and our use of information about you.

We want you to understand:

1. WHAT PERSONAL INFORMATION DO WE COLLECT ABOUT YOU?

We collect and use personal information about you, including when you interact with us, register for an Alipay account, use the Alipay Services to make purchases or otherwise conduct financial transactions, or otherwise visit or use our Alipay Services. The personal information that we collect includes:

- your basic personal details, including first and last name, and copies of your personal ID documents;
- contact information including your address, phone number, email, or other information that permits us to contact you;
- registration details;
- financial information and tax identification information;
- transaction details; and
- technical information, including:
 - information about the device you use to interact with us, and
 - information from your visits to our websites or mobile sites.

2. HOW WE OBTAIN YOUR PERSONAL INFORMATION

We collect personal information about you in connection with the Alipay Services. For example, we collect your personal information when you browse our websites, register as a User of Alipay Services, or log into your Alipay account to use our Alipay Services on a merchant site; or when you sell or provide products or services on one of the merchant sites using Alipay Services.

We also receive personal information about you from other sources, including

- merchant sites from which you buy or sell goods or services using Alipay Services;
- Affiliates, Alipay Group companies and other third party suppliers providing services on our behalf;
- banks and other payment institutions that we cooperate with to provide you with the Alipay Services; and
- publicly available sources.

We combine information that we have about you from various sources including the information you have provided to us.

Please refer to [How we use your personal information](#) for more details.

3. HOW WE USE YOUR PERSONAL INFORMATION

We use the information we collect to operate our business, including the Alipay Services. For example, we may use your personal information for the following purposes:

- (1) verifying your identity, including during account creation and payment password reset processes;

(2) verifying your eligibility as a User of Alipay Services (including “know your customer”, anti-money laundering and counter-terrorist financing verification);

(3) processing, maintaining and managing your registration as a User;

(4) providing you with Alipay Services and related User services, including operating the Alipay Services and enabling transactions, customizing your user experience, facilitating the settlement of purchase price for goods and services, shipping and related services for purchases, charge-backs, sending notices about transactions, and responding to your queries, feedback, claims or disputes;

(5) contacting you in relation to our provision of Alipay Services, contacting you in connection with any communication preferences or requests you have expressed, asking you for feedback about Alipay Services or other related products and services;

(6) collecting feedback from you and your staff about our products and services and using such feedback to improve our business and/or customize products and services for you;

(7) sending you information about products and services, including for promotional purposes; and contacting you for legal purposes;

(8) managing risk, performing creditworthiness and solvency checks, or assessing, detecting, investigating, preventing or remediating fraud, data breaches, information security risks or other potentially prohibited or illegal activities;

(9) detecting, investigating, preventing or remediating violations of your agreements with us or the merchant site or any applicable policy, industry standards, guidelines, laws and regulations and our policies;

(10) managing our everyday business needs, such as internal recordkeeping, reporting and other account management, client reporting, business continuity and disaster recovery, regulatory reporting and legal compliance;

(11) making disclosures as may be required by any law or regulation, government official or other third party, including any card association or other payment network. Such disclosures may also be made pursuant to any subpoena, court order or other legal process or requirement applicable to us or any Alipay Group company (including “know your customer”, anti-money laundering and counter-terrorist financing reporting requirements or other commercial disputes);

(12) making disclosures to third parties including relevant regulators to prevent any harm or financial loss, to report suspected illegal activity or to establish, exercise or defend claims or potential claims on behalf of ourselves or any Alipay Group company;

(13) improving and optimizing the Alipay Services, conducting trend analysis or using data analytics to obtain information and insights on transaction and usage patterns;

(14) managing our business including to protect Users, prevent harm, fraud or theft to ourselves and others, maintain the security of our products, and protect our rights or property and those of others; and

(15) for other purposes for which we provide specific notice at the time of collection.

4. WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We share your personal information to operate and manage our business, including for the purposes indicated under How We Use Your Personal Information. For example, we may share your information with:

- companies in the Alipay Group providing services on our behalf or to which we provide services;
- third parties including:
 - any agent, contractor or third party service provider that we work with in providing Alipay Services or conducting related activities such as risk management, fraud monitoring and dispute resolution, or other purposes as required by law. For example, we work with third parties to help us with fraud prevention, anti-money laundering checks, credit checking, bill collection, data entry, database management, promotions, marketing, customer service, technology services, products and services alerts and payment extension services;
- entities with whom Alipay maintain commercial arrangements, including merchant sites, online merchants, and companies in the Alibaba Group;
- banks, card associations, payment networks or acquiring institutions, and other, including those involved in processing of payments and conducting of transactions through Alipay Services; and
- law enforcement agencies, insurers, government and regulatory authorities or any other organizations to which Alipay, or any Alipay Group company or third party service provider is under an obligation to make disclosure under the requirements of any applicable law, regulation or commercial arrangement;
- individuals and entities involved in any merger, acquisition, corporate reorganization or financing, or similar transaction with us, including in the event of the sale of all or part of our assets; and
- our own and others' professional advisors (e.g., lawyers, accountants, auditors and trustees).

See [How do we store and protect your personal information?](#) for information on how we keep your personal information secure when sharing it with others.

5. HOW DO WE STORE AND PROTECT YOUR PERSONAL INFORMATION?

We will keep your personal information in accordance with our policies and for as long as it is necessary to provide you with the Alipay Services or other purposes as set out in this notice. In addition, we may retain your personal information for a longer period (including after you are no longer a User), if it is necessary to comply with laws and regulations applicable to us.

We use a variety of security measures and technologies designed to help protect your personal information from unauthorised access, use, disclosure, alteration or destruction consistent with applicable data protection and privacy laws and regulations. You are responsible for maintaining the security of your account information (username, password, etc.) for Alipay Services in your possession or control.

6. HOW DO WE PROCESS PERSONAL INFORMATION ABOUT CHILDREN?

Our service is not directed towards children under 13 years old nor does Alipay knowingly collect information from children under 13. If you are under 13, please do not use Alipay Services or submit any personal information to us.

If you are above 13 but below 16 years old, and where we have asked for your consent for collecting your information in order to provide services to you, you must ask your parents or guardian to read this Notice, and use our services or provide us with your information with prior express consent from your parents or guardian. If your guardian disagrees to your use of our services or provision of information to us in accordance with this Notice, please cease immediately the use of our services and notify us promptly so that we can take appropriate actions.

If you, acting as a guardian of a child, have relevant questions in respect of a child's personal information, please contact us using the details set out in the [Contact us](#) section below.

7. THIRD PARTY SERVICES AND SITES

The Alipay Services and our website may provide links to other websites and services (including other online merchant sites) for your convenience and information. These services and websites may operate independently from us. Linked services and websites may have their own privacy notices or policies, which we strongly suggest you review if you visit any linked websites. To the extent any linked websites you visit are not owned or controlled by us, we are not responsible for these websites' or services content, any use of these services or websites by you, or the privacy practices of these services or websites.

8. CHANGES TO THIS NOTICE

We may change, amend or revise this Notice from time to time. We will notify you of any substantive or material change in this Notice by updating this web page, sending push notifications, e-mails or letters, by phone or by publishing announcements on our website (<https://intl.alipay.com/>).

You can review this Notice at the home page of our website (<https://intl.alipay.com/>).

9. CONTACT US

If you have questions or requests about the privacy issues relating to the processing of your personal information, you can contact us by email at privacy@alipay.com or at our business address: Privacy Matters, 8 Shenton Way #45-01 AXA Tower, Singapore 068811. Please provide us with your email address and the merchant site your query is related to. As required under applicable law, please note that we may take steps to ask you to provide further information to verify your identity before granting you access to information or acting on your request to exercise your rights.

APPENDIX 1. PROVISIONS SPECIFIC TO EU USERS

If you are an individual in the European Union (EU) whose personal data we process in relation to either our offer of goods or services to you or our monitoring of your behaviour in the EU (EU Users), the following additional provisions may also apply to you.

1. WHO IS YOUR DATA CONTROLLER AND EU REPRESENTATIVE?

The data controller of your personal information is Alipay Singapore E-Commerce Private Limited (any references to **Alipay**, **we**, **our** or **us** in this Notice as applied to you are intended to refer to this entity). Our representative in the EU is Alipay (Europe) Limited, 11-13, Boulevard de la Foire, L – 1528, Luxembourg.

2. WHAT IS OUR LEGAL BASIS FOR USING YOUR PERSONAL INFORMATION?

We use your personal information on bases set out below.

- For the performance of [Alipay Services Agreement](#) or other contracts to which you are a party.
- To comply with legal and regulatory obligations.
- For legitimate business purposes.
- Using your personal information helps us to operate and improve our business and minimise any disruption to the services that we may offer to you for. It also allows us to make our communications with you more relevant and personalised to you, and to make your experience of our products and services efficient and effective.
- As we are based in Singapore and have infrastructure in the US, we need to transfer your personal information internationally as part of our business structure, including as a result of laws and regulations applicable to us and other Alipay Group companies and legal claims or proceedings that involve us or other Alipay Group companies.
- However, in cases in which we wish to use your data for our legitimate business purposes, we carefully consider the position and do not go ahead if we think your interests or fundamental rights and freedoms relating to your personal information would be prejudiced. Examples of matters we consider include how we use your data responsibly (for instance security measures we put in place to protect it, such as access controls).
- Because you have given your consent. At times we may ask for your consent or the consent of the holder of parental responsibility over you (in case you are below the age of 16 years, please see [How do we process personal information about children?](#) below) to allow us to use your personal information for one or more purposes. See [Your rights with respect to your personal information](#) for information about the rights that you have if we process your information on the basis of your consent.

3. TRANSFERS OF YOUR PERSONAL INFORMATION OUTSIDE OF THE EEA

Your personal information may be processed by us, companies in the Alipay Group and our trusted third party suppliers outside of the European Economic Area (**EEA**), including in countries where data protection and privacy laws or regulations may not be equivalent to, or as protective as, the data protection and privacy laws and regulations in the EEA.

These countries include, among others:

- China;
- Singapore; and
- the United States.

In accordance with applicable data protection and privacy laws and regulations, we will implement appropriate measures to ensure that your personal information remains protected and secure when it is transferred outside of the EEA to a jurisdiction other than one that is recognised by the European Commission as having an adequate level of protection of personal data. These measures include (where applicable) transferring pursuant to data transfer agreements implementing standard data protection clauses. You can find information about these measures [here](#). If you would like further information, you can contact us at the details set out in the [Contact us](#) section below.

We may also transfer your personal information outside of the EEA as permitted by applicable data protection and privacy laws and regulations. Examples include where we need to transfer your personal information: (a) to perform a contract with you (or to take steps before the contract at your request); (b) perform a contract in your interests; or (c) in relation to legal claims.

4. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION

In accordance with applicable data protection and privacy laws and regulations, you may be entitled to:

- ask us about the processing of your personal information, including to be provided with a copy of your personal information;
- request the correction and/or (in some cases) deletion of your personal information;
- in some cases, request the restriction of the processing of your personal information, or object to that processing;
- withdraw your consent to the processing of your personal information (where Alipay is processing your personal information based on your consent);
- request receipt or transmission to another organisation, in a machine-readable form, of the personal information that you have provided to Alipay where we are using your personal information based on consent or performance of a contract; and
- complain to the relevant supervisory authority if your privacy rights are violated, or if you have suffered as a result of unlawful processing of your personal information.

Where you are given the option to share your personal information with us, you can always choose not to do so. If we have requested your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

However, choosing not to share your personal information with us or withdrawing your consent to our use of it could mean that we are unable to perform the actions necessary to achieve the purposes of processing described (see [How we use your personal information](#)) or that you are unable to make use of the services and products offered by us. After you have chosen to withdraw your consent, Alipay may be able to continue to process your personal information to the extent required or otherwise permitted by applicable data protection and privacy laws or regulations.

If you would like to exercise your rights, contact us using the details set out in the [Contact us](#) section above.

APPENDIX 2. PROVISIONS SPECIFIC TO CALIFORNIA RESIDENTS

If you are an individual residing in the State of California, the United States of America who is a registered member of a merchant site and who makes online purchases or sales from the merchant site using Alipay Services, the following additional provisions may also apply to you:

1. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL INFORMATION

In accordance with applicable data protection and privacy laws and regulations, you may be entitled to:

- be provided with a copy of the specific personal information collected about you during the last 12 months from the date of a verifiable consumer request from you; and
- seek deletion of your personal information upon submission of a verifiable consumer request, unless retention of such personal information is necessary or permitted by law.

If you would like to exercise your rights, contact us using the details set out in the [Contact us](#) section above.

Please also note that we do not sell your personal information.