

## Privacy Policy

**Sphere Commodities Group Pte Ltd and its affiliated companies (“the Sphere Group”, “we,” “our,” or “us”)** is committed to safeguarding your personal data in compliance with applicable laws and regulations in Singapore, the Philippines, and Australia.

This Privacy Policy outlines how we collect, use, disclose, and protect your personal data when you interact with us, particularly in relation to the recycling of electronic waste (e-waste), including devices with sensitive data such as computer hard drives.

### 1. Scope of the Policy

This policy applies to all personal data collected, used, disclosed, and stored by us in the course of our e-waste recycling operations.

### 2. Data We Collect

We may collect the following types of personal data:

- **Customer Data:** Name, contact details (e.g., phone number, email address, and physical address), and payment information.
- **Device Data:** Information related to electronic devices submitted for recycling, which may include residual data stored on computer hard drives or other storage media.

### 3. How We Collect Personal Data

We collect personal data through:

- **Direct interactions:** When you contact us, provide e-waste for recycling, or use our services.
- **Automatic means:** From devices submitted for recycling if data retrieval is necessary for secure destruction or compliance purposes.

### 4. Purpose of Data Collection

We process personal data for the following purposes:

- **Service Provision:** To facilitate the collection, processing, and recycling of e-waste.
- **Secure Data Destruction:** To ensure proper handling and irreversible destruction of data on storage devices.
- **Customer Support:** To respond to inquiries and provide assistance related to our services.
- **Regulatory Compliance:** To comply with legal obligations under data protection laws in Singapore (PDPA), the Philippines (DPA), and Australia (Privacy Act 1988).

### 5. Data Handling and Secure Destruction

We take data security seriously.

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- Hard drives and other storage devices will be securely wiped or physically destroyed using industry-standard methods before recycling.
- Records of destruction may be provided upon request for accountability.

## 6. Data Sharing and Disclosure

We do not sell or rent personal data. However, we may disclose data to:

- Service Providers: Third-party vendors assisting with secure data destruction and recycling processes.
- Regulatory Authorities: To comply with legal or regulatory obligations.
- Legal Processes: If required by law or to protect our rights or those of others.

## 7. Data Retention

We will retain personal data only as long as necessary for the purposes outlined above or as required by law. Once data is no longer needed, we will securely delete or anonymize it.

## 8. Data Protection Measures

We implement strict measures to protect your personal data:

- Encryption and secure wiping for data on electronic devices.
- Restricted access to facilities handling data-bearing devices.
- Regular audits of our data handling and destruction processes.

## 9. Your Rights

Depending on your jurisdiction, you may have rights under applicable data protection laws, including the right to:

- Access, update, or correct your personal data.
- Withdraw consent for processing (where applicable).
- Request data portability.
- Lodge a complaint with the relevant data protection authority.

## 10. International Data Transfers

In cases where personal data is transferred across borders (e.g., between Singapore, the Philippines, and Australia), we ensure compliance with applicable data transfer laws and implement adequate safeguards.

## 11. Cookies and Website Data

## Privacy Policy

If you use our website, we may collect additional data such as cookies or IP addresses to improve your user experience. This is subject to separate terms outlined in our Website Privacy Policy.

### 12. Updates to This Policy

We may update this Privacy Policy periodically to reflect changes in laws or our operations. Any significant updates will be communicated via our website or other appropriate channels.

### 13. Review and Continuous Improvement

This policy will be reviewed annually to ensure it remains effective and compliant with evolving laws and best practices in both jurisdictions.

### 13. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us:

- Australia: Douglas Hunt, [Douglas.Hunt@spheregroup.global](mailto:Douglas.Hunt@spheregroup.global) PH: +61 439 876 116
- Singapore: Michael Abundo, [Michael.Abundo@spheregroup.global](mailto:Michael.Abundo@spheregroup.global) PH: +65 9066 3584
- Philippines: Weslie Capute, [Weslie.Capute@spheregroup.global](mailto:Weslie.Capute@spheregroup.global) PH: +63 977 821 1716

**Approved by the Board**

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