

OUR APPROACH TO PRIVACY

1. FaroX (the “Company”, “we”, “our”, or “us”) is committed to protecting your privacy. This Privacy Policy sets out how we collect, store, process, transfer, share, disclose and use data and personal information that identifies or is associated with you (“personal information”) and information regarding our use of cookies and similar technologies.

2. We collect personal information about individuals that are our direct customers and, where our customer is a business or similar entity, we collect personal information about individuals that are our customer’s employees, agents and other representatives. These individuals about whom we collect personal information are referred to as “you” and “your” throughout this Privacy Policy.

3. The Company provides information and links that allow customers to: browse, subscribe and access to sales copy pages, checkout pages, enrollment pages, advertisements, and other marketing messages (the “Services”) located at DanLok.com or any other websites operating by Dan Lok Education, Inc., its subsidiaries or affiliates (together known as our “Websites”).

4. This Privacy Policy applies to our Websites and the Services. Before accessing our Websites or using the Services, please ensure that you have read and understood this Privacy Policy.

5. By submitting your personal information to the Company, you consent to the collection, use, storage, processing and disclosure of your personal information in accordance with this Privacy Policy. If you do not consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy, please do not provide any personal information to the Company.

6. This Privacy Policy does not cover third party websites, services, applications or payment gateways and payment transaction processes that may be accessed via our Websites, and we accept no responsibility or liability in respect of third-party websites. Please check the privacy policies published on any third-party websites

which you may access through our Websites before submitting your personal information to them.

PERSONAL INFORMATION WE COLLECT ABOUT YOU AND HOW WE USE IT

7. We collect personal information about you when you voluntarily submit information directly to us when you access our Websites or use the Services. This can include information you provide to us when you register for an account, fill in a form, correspond with us via our Websites, social media account, phone, email or otherwise, subscribe to our mailing lists, newsletters or other forms of marketing communications, respond to surveys or use some other feature of the Services as available, from time to time.

8. In general, personal information may include, but is not limited to, your name, date of birth, financial information, home address, phone number, IP address, location data, weblogs, date, time, browser used, referring web addresses, other communication data, searches conducted and pages visited, and other details such as your occupation and title.

9. Certain Services can only be offered to you if you provide personal information to the Company, and accordingly the Company may not be able to offer you the Services if you choose not to provide it with required personal information.

10. Annex 1 attached hereto sets out the categories of personal information we collect about you and the purposes for which we collect and use your personal information. The table also lists the legal basis which we rely on to process the personal information, the categories of recipients to whom we may lawfully disclose the personal information and details as to how we determine applicable retention periods in respect of the personal information we collect about you.

11. We also automatically collect personal information about you indirectly about how you access and use the Services and information about the device you use to access the Services. We may link or combine the personally identifiable personal information

we collect about you directly and the information we collect about you indirectly. This allows us to provide you with a personalised experience regardless of how you interact with us.

12. The Company strives to limit the amount of personal information we collect to such personal information that is necessary and appropriate for the purposes identified in Annex 1 attached hereto. The Company will not use or disclose your personal information for purposes other than those for which it was collected, except with your consent or as permitted or required by applicable law.

13. We may anonymise and aggregate any of the personal information we collect, including information about individuals that are your subscribers, websites visitors or customers (so that it does not directly identify you or them). We may use anonymised information for purposes that include testing our IT systems, research, data analysis, improving the Services and developing new products and features. We may also share such anonymised information with third parties.

CUSTOMER DATA WE MAY COLLECT THROUGH THE PROVISION OF OUR SERVICES

14. During the provision of the Services, we may also collect personal information about individuals that are subscribers, website visitors or customers of our customers (the “Customer Data”).

15. By submitting or causing to be submitted Customer Data to us, you hereby grant, and represent and warrant that you have all rights necessary to grant, all rights and licences to the Customer Data required for the Company and its subcontractors and service providers to provide the Services. If the Company shares or publicly discloses information (including in marketing materials or in application development) that is derived from Customer Data, such data will, to a commercially reasonable extent, be aggregated or anonymized to reasonably avoid identification of a specific individual. You further agree that the Company will have the indefinite right to use, store, transmit, distribute, modify, copy,

display, sublicense, and create derivative works of the above mentioned anonymized, aggregated data.

16. In connection with Customer Data, you hereby represent, warrant and agree that: (a) you have obtained or will obtain the Customer Data lawfully and/or have not engaged in material misrepresentation, deception or other fraudulent or improper means to cause the Customer Data to be collected by the Company; (b) the Customer Data does not and will not violate any applicable laws or any person or entity's proprietary or intellectual property rights; (c) all Customer Data has and will be collected by you in accordance with a privacy policy that permits the Company to collect, use, and disclose such Customer Data as contemplated under and in accordance with, this Privacy Policy, and if required by applicable law, pursuant to consents obtained by you to do each of the foregoing; (d) you are solely responsible for ensuring compliance with all privacy laws in all jurisdictions that may apply to Customer Data; (e) the Company may exercise the rights in Customer Data granted hereunder without liability or cost to any third party; and (f) the Customer Data complies with this Privacy Policy. For purposes of clarity, we take no responsibility and assume no liability for any Customer Data, and you will be solely responsible for Customer Data and the consequences of collecting or sharing it hereunder. You may not submit, or cause to be submitted, any Customer Data that includes a social security number, passport number, driver's licence number, or similar identifier, credit card or debit card number, employment, financial or health information, or any other information which may be subject to specific data privacy and security laws.

17. In the event that Customer Data is disclosed to or accessed by an unauthorised party, the Company will promptly notify you and use reasonable efforts to cooperate with your investigation of the incident. In the event we have a reasonable, good faith belief that an unauthorised party has accessed Customer Data, we will promptly notify you and will use reasonable efforts to cooperate with your investigation of the incident. If such incident triggers any

third-party notice requirements, you (not the Company) shall be solely responsible for the timing, content, cost and method of any such notice and compliance with applicable laws. You (not the Company) bears sole responsibility for adequate security, protection and backup of Customer Data when in your or your representatives' or agents' possession or control. We are not responsible, and you are fully responsible, for what your authorised Users do with Customer Data.

STORING AND TRANSFERRING YOUR PERSONAL INFORMATION

18. We implement commercially reasonable physical, technical and organisational security safeguard measures to preserve and protect the integrity and security of your personal information against accidental or unlawful destruction, loss, change or damage. All personal information we collect will be stored on secure servers. All electronic transactions entered into via our Websites will be protected by SSL encryption technology. Where you register for an account on the Services, you are responsible for maintaining your account's security, including by implementing "strong" passwords, as more specifically explained in our Terms of Service. We cannot guarantee that unauthorised third parties will never be able to defeat our security measures or use your personal information for improper purposes. You acknowledge that you provide your personal information at your own risk.

19. We do not sell or rent your personal information to non-affiliated third parties except as permitted by law or as outlined within this Privacy Policy. However, in the event of a sale of all or substantially all of our business or another similar transaction, we may transfer or disclose your personal information to a purchaser or prospective purchaser, who may collect, use and disclose such information for the purposes of evaluating the proposed transaction or operating and managing the affairs of the acquired business, or for other purposes identified in this Privacy Policy.

20. The personal information we collect may be transferred to and stored and processed in countries outside of the jurisdiction you are in depending on where we and our third-party service providers have operations. If you are located in the European Union (“EU”), your personal information will be processed outside of the EU including in the United States; these international transfers of your personal information are necessary for the performance of our agreement with you in order to provide the Services.

General Data Privacy Regulation (GDPR)

21. The GDPR takes effect on May 25, 2018, and is intended to protect the data of European Union (EU) citizens.

As a company that markets its site, content, products and/or services online we do not specifically target our marketing to the EU or conduct business in or to the EU in any meaningful way. If the data that you provide to us in the course of your use of our site, content, products and/or services is governed by GDPR, we will abide by the relevant portions of the Regulation.

If you are a resident of the European Economic Area (EEA), or are accessing this site from within the EEA, you may have the right to request: access to, correction of, deletion of; portability of; and restriction or objection to processing of your personal data, from us. This includes the “right to be forgotten.”

To make any of these requests, please contact our GDPR contact at privacy@DanLok.com

22. To the extent we employ third party service providers to store, handle or process personal information on our behalf, such as data processing or office services, we will use contractual and other means to provide an appropriate level of protection while the information is being stored, handled or processed by them.

23. We are not liable with respect to any security incident that may result in loss, disclosure, or alteration of your personal information. Further, submission of information via the internet is never entirely secure. We cannot guarantee the security of information you submit

while it is in transit over the internet. Any submission of personal information is at your own risk.

YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

24. You have certain rights in respect of your personal information that we hold in accordance with certain applicable privacy laws:

- a. Right of access and portability. The right to obtain access to and to receive your personal information.
- b. Right to rectification. The right to obtain rectification of your personal information without undue delay where that personal information is inaccurate or incomplete.
- c. Right to erasure. The right to obtain the erasure of your personal information from our Websites without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed.
- d. Right to restriction. The right to obtain the restriction of the processing undertaken by us on your personal information in certain circumstances, such as where the accuracy of the personal information is contested by you, for a period enabling us to verify the accuracy of that personal information.
- e. Right to object. The right to object, on grounds relating to your particular situation, to the processing of your personal information, and to object to processing of your personal information for direct marketing purposes, to the extent it is related to such direct marketing.

25. If you wish to exercise one of these rights, please contact us using the contact details at the end of this Privacy Policy.

26. You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at

https://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

COOKIES AND SIMILAR TECHNOLOGIES

27. When you use our Services, read our emails, use our Websites or otherwise engage with us through a computer or mobile device, we and our third-party service providers, automatically collect information about you, the device you use to access the Services and track your preferences and activities on our Websites. We use this information to enhance and personalise your user experience, to monitor and improve our Websites and Services, and for other internal purposes.

28. We typically collect this information through a variety of tracking technologies, including cookies, Flash objects, web beacons, embedded scripts, location-identifying technologies, and similar technology (collectively, “tracking technologies”). We may combine this information with other personal information we collect directly from you.

29. Our Websites use cookies to distinguish you from other users of our Websites. Cookies are pieces of code that allow for personalization of our Websites by saving your information such as user ID and other preferences. A cookie is a small data file that we transfer to your device’s hard disk (such as your computer or smartphone) for record-keeping purposes.

30. We use the following types of cookies:

a. Strictly necessary cookies. These are cookies that are required for the essential operation of our Websites such as to authenticate users and prevent fraudulent use.

b. Analytical/performance cookies. They allow us to recognize and count the number of visitors and to see how visitors move around our Websites when they are using it. This helps us to improve the way our Websites work, for example, by ensuring that users are finding what they are looking for easily, and helps us understand what interests our users have and measures how effective our content is.

c. Functionality cookies. These are used to recognize you when you return to our Websites. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region). These cookies may be

set by third party providers whose services we have added to our pages.

d. Targeting cookies. These cookies record your visit to our Websites, the pages you have visited and the links you have followed. We will use this information to make our Websites and the advertising displayed on them more relevant to your interests. We may also share this information with third parties for this purpose.

31. We may collect analytics data, or use third-party analytics tools such as Google Analytics, to help us measure traffic and usage trends for the Services and to understand more about the demographics of our users. You can learn more about Google's practices at <https://policies.google.com/privacy/partners>, and view its currently available opt-out options at <https://tools.google.com/dlpage/gaoptout>.

32. We may also work with third party partners to employ technologies, including the application of statistical modelling tools, which permit us to recognize and contact you across multiple devices.

33. Although we do our best to honour the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

34. The cookies we use are designed to help you get the most from our Websites but if you do not wish to receive cookies, most browsers allow you to change your cookie settings. Please note that if you choose to refuse cookies you may not be able to use the full functionality of our Websites. These settings will typically be found in the "options" or "preferences" menu of your browser. In order to understand these settings, the following links may be helpful, otherwise you should refer to your browser instructions or help screen to learn more about these functions.

- Cookie settings in Internet Explorer
- Cookie settings in Firefox
- Cookie settings in Chrome
- Cookie settings in Safari web and iOS

35. Deleting cookies does not delete non-cookie technologies such as Local Storage Objects (LSOs) such as Flash objects and HTML5. You can learn more about Flash objects – including how to manage privacy and storage settings for Flash cookies – on Adobe’s website or by clicking here . Various browsers may offer their own management tools for removing HTML5 LSOs. For more information about cookies, and how to disable cookies, visit http://www.allaboutcookies.org_.

36. When we send emails to our contact lists, it will sometimes track who opened the emails and who clicked the links to measure email campaigns’ performance. To do this, we may include single pixel gifs, also called web beacons, in emails it sends. Web beacons allow us to collect information about when you open the email, your IP address, your browser or email client type, and other similar details.

37. We may also use the capability to track when a URL has been clicked inside of an email message sent by its system. The Company uses this functionality to track which links were clicked and in what quantity, as well as the aggregate number of links clicked. This click tracking functionality does not collect any personal information.

MARKETING AND ADVERTISING

38. From time to time, we may contact you with relevant information about the Services. We may use personal information we collect about you to help us determine the most relevant information to share with you. Most messages will be sent by email.

39. If you do not want to receive such messages from us, you may opt-out by clicking on the unsubscribe link at the bottom of our emails. You are not permitted to unsubscribe or opt-out of non-promotional messages regarding your account, such as account verification, changes or updates to features of the Services, or technical or security notices.

FROM THIRD PARTIES

40. We participate in interest-based advertising and use third party advertising companies to serve you targeted advertisements based on your browsing history. We permit third party online advertising networks, social media companies and other third-party services to collect information about your use of our Websites and mobile apps over time so that they may play or display ads on our Websites, apps or other services and other devices you may use. Typically, though not always, the information used for interest-based advertising is collected through cookies or similar tracking technologies, which recognize the device you are using and collect information, including clickstream information, browser type, time and date you visited the site and other information. We may share a common account identifier (such as an email address or user ID) with our third-party advertising partners to help identify you across devices.

41. We and our third-party partners use this information to make the advertisements you see online more relevant to your interests, as well as to provide advertising-related services such as reporting, attribution, analytics and market research.

42. If we are using personal information you provided to us in order to enable us to send you materials, such as newsletters or product alerts via text or email], and you decide you don't want to receive such materials, you may opt out by following the opt-out instructions in the email or other communication (e.g., by responding to the text with "STOP"), or by contacting us using the contact information below. When we receive your request, we will take reasonable steps to remove your name from our distribution lists. You need to understand it may take a period of time to remove your name from our lists after your request and due to such latency you may still receive materials for a period of time after you opt out. In addition to opting out, you have the ability to access, amend, and delete your personal information by contacting us using the contact information below., however some of these opt-outs may not be effective unless your browser is set to accept cookies. If you delete cookies, change your browser settings, switch browsers or computers, or use another operating system, you will need to opt-out again.

CONSENT

45. To the extent possible, we will obtain express consent to collect, use and disclose personal information about an individual directly from such individuals. However, depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or expressed. If you provide personal information concerning another individual to us, you represent that, prior to submitting such information, you have obtained the necessary consent or authority to permit the Company to collect, use and disclose such personal information for the purposes set out in the Privacy Policy, or the collection, use and disclosure is permitted by applicable law.

46. You may withdraw your consent to the use and disclosure of your personal information, or opt-out of certain uses and disclosures. To contact us about withdrawing consent or opting-out, please contact us using the contact details at the end of this Privacy Policy.

LINKS TO THIRD PARTY SITES

47. Our Websites may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies, that we do not accept any responsibility or liability for their policies and you release us of any responsibility for the actions, practices and omissions of third parties. Please check the individual policies before you submit any personal information to those websites.

OUR POLICY TOWARDS CHILDREN

48. Our Websites may be used only by persons who are at least the age of majority under applicable law and are legally capable of entering into a binding contract and consenting to the processing of their personal data. Our Websites and the Services may not be used by persons in jurisdictions where access to or use of our Websites and the Services or any part of it may be illegal or prohibited. Our Websites will only be used for lawful purposes and not for any unauthorised purpose or in contravention of any applicable law or regulation.

49. We do not knowingly collect any personal information from children under the age of majority. Those under the age of majority should not use the Websites or provide the Company with any personal information. The Company encourages parents and legal guardians to monitor their children's Internet usage and if you have reasons to believe that a child under the age of majority has provided personal information to us, please email us at admin@faro-x.com.au

CHANGES TO THIS POLICY

50. We may update this Privacy Policy from time to time and so you should review this page periodically. When we change this Privacy Policy in a material way, we will update the "last modified" date at the end of this Privacy Policy. Changes to this Privacy Policy are effective when they are posted on our Websites.

NOTICE TO YOU

51. If we need to provide you with information about something, whether for legal, marketing or other business related purposes, we will select what we believe is the best way to get in contact with you. We will usually do this through email or by placing a notice on our Websites. The fact that we may send notices to you will not stop you from being able to opt out of certain types of contact as described in this Privacy Policy.

CONTACTING US

52. Regardless of your location, any questions, comments and requests regarding this Privacy Policy are welcome and should be addressed to admin@faro-x.com.au as appropriate depending on how you are using our Services.

ANNEX 1 – PERSONAL INFORMATION WE COLLECT WHEN YOU USE THE SERVICE

CATEGORIES OF PERSONAL INFORMATION

1. CONTACT INFORMATION AND BASIC PERSONAL DETAILS

- For example: your full name, phone number, postal address, e-mail address, zip code.
- How we use it. We use this information to:
 - communicate with you, including sending statements and invoices, communications, news, alerts and marketing communications;
 - deal with enquiries and complaints made by or about you relating to the Services;
 - authentication purposes; and
 - create customer accounts and operate, maintain and provide to you the features and functionality of the Services.
- Legal basis for the processing. The processing is necessary for:

- the performance of a contract and to take steps prior to entering into a contract;
- our legitimate interests, namely administering the Services, for marketing purposes and communicating with users; and to comply with certain legal obligations; and
- to comply with certain legal obligations.

2. WEBSITES, BUSINESS AND MARKETING INFORMATION

- For example: company websites, IP address, current email list size, e-commerce software in use, email marketing software, product usage information, demographic data, data about customer's 3rd party services, other business information (Facebook ad spend, status of business, industry, business goals).
- How we use it. We use this information to:
 - operate, maintain and provide to you the features and functionality of the Services;
 - provide you with Services to deal with any requests or inquiries you may have and to carry out the Company's obligations arising from any contracts it has entered into with you;
 - ensure that content is presented in the most effective manner; and
 - determine relevant advertising / marketing activities.
- Legal basis for the processing. The processing is necessary for:
 - the performance of a contract and to take steps prior to entering into a contract; and
 - our legitimate interests, namely administering the Services and for marketing purposes.

3. PAYMENT INFORMATION

- For example: your credit card information, account information, billing address, shipping address and related information.
- How we use it. We use this information to facilitate payment for use of the Services and to detect and prevent fraud.

- Legal basis for the processing. The processing is necessary for the performance of our contract with you and our legitimate interests, namely the detection and prevention of fraud.

4. CORRESPONDENCE AND COMMENTS

- For example: comments recorded when you contact us directly, e.g. by email, phone, mail, when you post on message boards, blogs or complete an online form or provide quality survey input.
- How we use it. To address your questions, issues and concerns and improve the Services, to determine products and services that may be of interest to you and to send you news, alerts and marketing communications in accordance with your marketing preferences.
- Legal basis for the processing. The processing is necessary for our legitimate interests, namely communicating with users and for marketing purposes.

5. ALL PERSONAL INFORMATION SET OUT ABOVE

- How we use it. We will use all the personal information we collect to prevent and detect fraud, to operate, maintain and provide to you the features and functionality of the Services, to communicate with you, to monitor and improve the Services, our Websites and business, and to help us develop new products and services.
- Legal basis for the processing. The processing is necessary for our legitimate interest, namely to administer and improve the Services, our Website, our business and develop new services.

CATEGORIES OF POTENTIAL RECIPIENTS OF DISCLOSED PERSONAL INFORMATION

6. CATEGORIES OF POTENTIAL RECIPIENTS OF DISCLOSED PERSONAL INFORMATION

As required in accordance the uses of personal information outlined above, we may share and disclose your personal information with the following categories of recipients:

- Group of companies. Personal information may be disclosed to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes, and on the legal basis, set out in this policy.
- Service providers and advisors. Personal information may be disclosed to third party vendors and other service providers that perform services for us, on our behalf, which may include providing mailing or email services, tax and accounting services, payments processing, data enhancement services, fraud prevention, web hosting, or providing analytic services. Your personal information is never transferred to any third-party for the purposes of remarketing to you.
- Partners. We may disclose your personal information to partners of the Company, so that they can communicate with you (whether by email, post or otherwise) and provide you with promotional materials and additional information about their products, services, contests, promotions and special offers that may be of interest to you, or and use that information subject to and for other purposes contemplated by this Policy.
- Purchasers and third parties in connection with a business transaction. Personal information may be disclosed to third parties in connection with a transaction, such as a merger, sale of assets or shares, reorganisation, financing, change of control or acquisition of all or a portion of our business.
- Law enforcement, regulators and other parties for legal reasons. Personal information may be disclosed to a government or regulatory entity that has asserted its lawful authority to obtain the information or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) enforce our Terms of Service or to protect the security or integrity of our Services or Websites; and/or (c)

exercise or protect the rights, property, or personal safety of the Company, our customers or others.

7. RETENTION PERIOD

We retain personal information for no longer than is necessary for the purposes set out above and in accordance with our legal obligations and legitimate business interests.