

SPOKKZ GLOBAL FOUNDATION LTD

PRIVACY POLICY

VERSION UPDATED AS OF 20 JUNE 2018

1. OVERVIEW

The SPOKKZ Global Foundation Ltd, a validly established non-profitable foundation under the laws and regulations of Singapore (together with its parent company, subsidiaries and affiliates, "**Spokkz**" or "**us**") takes your privacy seriously, and the purpose of this privacy policy (the "**Privacy Policy**") is to inform you on how and what data we collect and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process. When you use or access any of Spokkz's websites, including the official website of Spokkz (<https://spokkz.com>) and its related websites (collectively, the "**Website**"), you expressly consent to our collection, storage, use, transfer, retention and disclosure of your personal data as described in this Privacy Policy.

Spokkz is committed to complying with the Personal Data Protection Act 2012 of Singapore, and if you have any comments, suggestions or complaints, please contact us by the means provided in this Privacy Policy.

2. COLLECTION

2.1. We may collect your personal data when you:

- a) create an account with us; or
- b) otherwise provide us with your personal data to us through the Website; or
- c) use of any related services connected to the Website; or
- d) participate in contests and surveys, apply for a job, or otherwise participate in activities we promote that might require information about you; or
- e) complete contact forms or request newsletters or other information from us (ex: email)

(the "**Services**").

This personal data may include, without limitation:

- i) your name;
- ii) email, home and office address;
- iii) telephone numbers;
- iv) billing information;
- v) date of birth;
- vi) usernames and passwords; and
- vii) any other form of personal data relevant to the use of the Website and its Services, which may directly or indirectly identify you.

2.2. We may at other times acquire personal data from other sources such as offline records, publicly available information, or from third parties, in order to provide you with the Services.

2.3. You must only submit to us information which is accurate and not misleading. We reserve the right to request for further documentation in order to verify the information provided by you.

2.4. Computer Data

2.4.1. When you access the Website, we will automatically collect your computer data, which may include

- a) browser type;
- b) IP address;

- c) language;
- d) operating system;
- e) cookies and the ID and location of your device;
- f) the state or country from which you accessed the Website;
- g) the pages you view;
- h) length of time spent on pages;
- i) communications with other users through the Website if applicable;
- j) the Services you use and the manner in which you use such Services (e.g., the content you access, view, click on, search for, post, follow, share, upload, or tag);
- k) the date and time of your visit;
- l) the websites you visited immediately before and after visiting the Website;
- m) metadata, logs files, error logs;
- n) other geographic and demographic information; and
- o) other hardware and software information.

2.4.2. This computer data is collected for analysis and evaluation in order to help us improve our Website and the Services we provide.

2.4.3. To the extent that such computer data is maintained in a manner that identifies your name or contact information, it will be treated as personal data; otherwise, such computer data will be treated as non-personal data.

2.4.4. We and our authorised service providers may use cookies, web beacons, and other similar technologies for storing information when you access the Website. Cookies are small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message, and we use such cookies to improve your access and use of the Website and the Services. **Cookies and similar technologies** on our Website and our mobile applications allow us to track your browsing behaviour, links clicked, items purchased, your device type, and to collect various data, including analytics, about how you use and interact with our Services

2.4.5. Most web browsers automatically accept cookies, but you may set your browser to block cookies (consult the instructions for your particular browser on how to do this). Please note that if you decide to block cookies, this may interfere with your ability to use certain functionalities of the Website and/or the Services.

3. USE AND DISCLOSURE

3.1. The personal data we collect from you will be used, or shared with third parties (including related companies and third party service providers), for some or all of the following purposes:

- 3.1.1. creating or maintaining any account or profile you may have with us;

- 3.1.2. verifying and carrying out financial transactions in relation to any payments or transfers you make;
 - 3.1.3. carrying out research and analytics on our users' demographics and behaviour;
 - 3.1.4. provide you with information we think you may find useful or which you have requested from us;
 - 3.1.5. enhancing user experience;
 - 3.1.6. determining and verifying your eligibility for certain marketing or transaction events and other features of the Website;
 - 3.1.7. enforcing our terms of use; and/or
 - 3.1.8. communicating with you in relation to your account and alerting you to the latest developments of Spokkz
- 3.2. When you register an account or otherwise provide us with your personal data, we may also use the personal data to send to you marketing and/or promotional materials about us and our Services from time to time. You can unsubscribe from receiving the marketing information at any time by using the unsubscribe function within the electronic marketing material.

3.3. Sharing of Personal Data

- 3.3.1. We may share:
- (a) your personal data with any person or entity where we believe in good faith that such disclosure is necessary to: (i) comply with the law or in response to a subpoena, court order, government request, or other legal process; (ii) produce relevant documents or information in connection with litigation, arbitration, mediation, adjudication, government or internal investigations, or other legal or administrative proceedings; (iii) protect the interests, rights, safety, or property of Spokkz or others; (iv) enforce our terms of use; (v) provide users of the Services with the services they request; (vi) provide you with special offers or promotions from us; or (vii) operate our systems properly; and
 - (b) personal data about our visitors, customers, or former customers with the following types of companies that perform services on our behalf or with whom we have joint marketing agreements:
 - (i) Non-financial companies such as envelope stuffers, fulfilment service providers, payment processors, data processors, customer/support services, etc., and/or
 - (ii) Financial service providers such as companies engaged in banking, payments, mortgage lending, consumer finance, securities, and insurance.
- 3.3.2. In sharing your personal data with such parties, we will reasonably endeavour to ensure that the third parties and our affiliates keep your personal data secure from unauthorised access, collection, use, disclosure, or similar risks and retain your personal data only for as long as they need your personal data to achieve the abovementioned purposes.
- 3.3.3. If any disclosure of your personal data involves the transfer of your personal data out of Singapore, we will take steps to reasonably ensure that the receiving jurisdiction has in place a standard of protection accorded to

personal data that is comparable to the protection under Singapore's data protection legislation.

3.4. Third party links

- 3.4.1. The Website and its Services may contain links to third-party websites, including identity verification and social networking websites. Your use of these features may result in the collection or sharing of information about you, depending on the feature. Please be aware that we are not responsible for the content or privacy practices of other websites or services to which we link. We do not endorse or make any representations about third-party websites or services. The personal data you choose to provide to or that is collected by these third parties is not covered by our Privacy Statement. We strongly encourage you to read such third parties' privacy statements.

4. SECURITY

- 4.1. We have implemented reasonable security arrangements including physical, administrative, technical, and electronic security measures to protect against the loss, misuse, and alteration of your personal data. Despite our best efforts, however, no security measures are perfect or impenetrable. In the event where you believe your privacy has been breached, please contact us immediately.
- 4.2. It is your responsibility to protect any passwords you require to access your account, the Website or its Services. Please use unique numbers, letters and special characters, and do not share your password with anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal data and other information submitted to us. You could also be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason or if you have grounds to believe that your password has been compromised, you should immediately contact us and change your password.
- 4.3. You undertake to treat your password and other confidential information in relation to the use of the Website and its Services confidentially, and we disclaim any liability arising from your failure to do so.

5. UPDATING YOUR PERSONAL DATA

You may update any of your personal data we possess by means of updating and accessing your account details, and if not, by contacting us.

6. WITHDRAWAL OF CONSENT & DELETION OF PERSONAL DATA

- 6.1. You may communicate your objection to our continual use and/or disclosure of your personal data for any of the purposes and in the manner as stated above at any time by contacting us at our e-mail address provided in Clause 8.3 below.
- 6.2. Please note that if you communicate your objection to our use and/or disclosure of your personal data for the purposes and in the manner as stated above, depending on the nature of your objection, we may not be in a position to continue to provide our products or services to you or perform on any contract we have with you. Our legal rights and remedies are expressly reserved in such event.

7. RETENTION OF PERSONAL DATA

- 7.1. We retain personal data only for as long as necessary to provide the Services you have requested and thereafter for a variety of legitimate legal or business purposes. These might include retention periods:

- 7.1.1. mandated by law, contract or similar obligations applicable to our business operations;
- 7.1.2. for preserving, resolving, defending or enforcing our legal/contractual rights; or
- 7.1.3. needed to maintain adequate and accurate business and financial records.

8. GENERAL

- 8.1. We may amend this Privacy Policy at any time by posting the amended terms on the Website, and these amendments will become effective upon posting. Your continued use of the Website and the Services following these changes means that you accept such revisions. If we make any material changes to this Privacy Policy, we will post the changes here and notify you in the manner and to the extent required by law.
- 8.2. You acknowledge that, notwithstanding this Privacy Policy, we have at all times the right to disclose your personal data to any legal, regulatory, governmental, tax, law enforcement or other authorities pursuant to applicable law and our legal obligations. This may arise from any investigation, order, or request by such parties. To the furthest extent permissible by law, you agree not to take any action and/or waive your rights to take any action against us for the disclosure of your personal data in these circumstances.
- 8.3. If you wish to contact us for anything in relation to this Privacy Policy, please feel free to contact us (and our data protection officer) through support@spokkz.com.