



# Spuul Privacy Policy

Effective & Last updated May 25, 2018

Spuul takes your privacy very seriously and is committed to protecting your personal information. This privacy policy sets out the way in which any personal information you provide to us is used and kept secure by Spuul. It applies whenever we collect your personal data (including when you use our website [www.spuul.com](http://www.spuul.com) or its App version {collectively referred to as "Digital Properties"}), so please read it carefully.

Please note that this privacy policy forms part of our digital terms of use, which you can read [here](#).

## About us

Spuul Pte Limited ("Spuul") is a company incorporated under the laws of Singapore. Spuul owns and operates the OTT platform [www.spuul.com](http://www.spuul.com) and its App version, through which licensed cinematographic films are made available to users/subscribers for viewing via internet enabled devices on VOD basis, worldwide.

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

Our Digital Properties can be accessed by persons of all ages. However,



told us that you are allowed to do so. You must truthfully tell us your name, email address, country and date of birth. Our system will then ask you for the name and email address of your parent or legal guardian. We will send them an email so they are aware of your request and will ask them for their consent and to confirm they have authority to give that consent. We need their consent or refusal within 7 days, or else we will assume consent is not granted. Their consent can be withdrawn at any stage. If you are under 13 years of age, you are not allowed to use or access the Digital Properties.

## About this privacy policy

This privacy policy explains what information we may collect about you, how we may use it, and the steps we take to ensure that it is kept secure. We also explain your rights in respect of your personal data.

Please note that our Digital Properties may contain links to third party websites / digital platforms which are provided for your convenience. We are only responsible for the privacy practices and security of our own Digital Properties. We recommend that you check the privacy and security policies and procedures of each and every other website / digital platform that you visit.

## 1. Collection

1.1 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 Digital Properties or

c) use of any related services connected to the Digital Properties or view any cinematographic films; 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)

This personal data may include, without limitation:

- i) **Account Details** - username, password, profile picture
- ii) **Contact Details** - email address, home and office address phone number
- iii) **Location Details** - physical address, billing address, timezone
- iv) **Identity Details** - full name, proof of identity (e.g. drivers licence, passport), proof of address (e.g. utility bill), photograph of the user., date of birth
- v) **Financial Information** - credit card details, wire transfer details, payment processor any other form of personal data relevant to the use of the Digital Properties and its services, which may directly or indirectly identify you.

1.2 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.

1.3 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.

1.4 We shall collect the following **Computer Data**

When you access the Digital Properties, 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 Digital Properties

- g) the pages/videos you view;
- h) length of time spent on pages /videos;
- i) communications with other users through the Digital Properties 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 our Digital Properties;
- m) metadata, logs files, error logs;
- n) other geographic and demographic information; and
- o) other hardware and software information.
- p) which adverts you saw and responded to
- q) which pop up or push messages you might have seen and responded to

This computer data is collected for analysis and evaluation in order to help us improve our Digital Properties and the services we provide.

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. Use and disclosure

2.1 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:

2.1.1 creating or maintaining any account or profile you may have with us;

### 2.1.2 to track your activity on our Digital Platforms

2.1.3 verifying and carrying out financial transactions in relation to any payments or transfers you make;

2.1.4 carrying out research and analytics on our users' demographics and behaviour;

2.1.5 to personalise and/ tailor any communications that we may send you and provide you with products, services or information we think you may find useful or which you have requested from us or have expressed an interest in

2.1.6 to personalise and enhance user experience;

2.1.7 determining and verifying your eligibility for certain marketing or transaction events and other features of the Digital Properties;

2.1.8 enforcing our terms of use; and/or

2.1.9 communicating with you in relation to your account and alerting you to the latest developments

2.1.10 to enable us to administer any competitions or other offers/promotions which you enter into for fraud screening and prevention purposes

2.2 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.

### 2.3 Disclosure of Personal Data

In order to provide our products and services to you or to otherwise fulfil contractual arrangements that we have with you, we may need to appoint other organisations to carry out some of the data processing activities on our behalf. These may include, for example, payment processing organisations, delivery organisations, fraud prevention and screening and credit risk management

companies, and mailing houses.

We may share your data with advertising networks and/or social media platforms for the purposes of selecting and serving relevant adverts to you via those networks/platforms, and to search engine and analytics providers

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 Spuul 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/or

(viii) otherwise as permitted under applicable law.

(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.

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.

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.

## **2.4 Third party links**

The Digital Properties 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.

# **3. Security**

3.1 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. When you submit your credit card details to us, we use industry standard Secure Sockets Layer (SSL) encryption technology to guard your information. 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.

3.2 It is your responsibility to protect any passwords you require to access your account, on the Digital Properties. 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.

3.3 You undertake to treat your password and other confidential information in relation to the use of the Digital Properties and its services confidentially, and we disclaim any liability arising from your failure to do so.

## 4. Cookies

In common with many other website operators, we use standard technology called 'cookies' on our website. Cookies are small pieces of information that are stored by your browser on your computer's hard drive and they are used to record how you navigate this website on each visit and we use such cookies to improve your access and use of the Digital Properties and the services

We and our authorised service providers may use cookies, web beacons, and other similar technologies for storing information when you access the Digital Properties. Cookies and similar technologies on our Digital Properties 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

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 Digital Properties and/or the services

In general, we use the following types of cookie:

**Strictly Necessary Cookies:** These are cookies that are required for the operation of our Digital Properties

**Analytical/Performance Cookies:** These allow us to recognise and count the number of visitors and see how visitors move around our Digital Properties when they are using it. This helps us to improve the way our Digital Properties works,



for example, by ensuring that users can find what they are looking for easily.

**Functionality Cookies:** These are used to improve the functional performance of the Digital Properties and make it easier for you to use.

**Targeting Cookies:** These cookies record your visit to our Digital Properties and your browsing habits, such as the pages you have visited and the links you have followed. They are used to deliver advertising which is more relevant to your interests and also may be used to limit the number of times that you see an advertisement. They may be placed by us or by advertising networks with our permission. Please note, these cookies do not contain any of your personal information.

By continuing to use our Digital Properties without choosing to delete/block cookies, you agree that we can place these types of cookies on your device. You can manage cookies by activating the setting on your internet browser that allows you to refuse the setting of all or some cookies. Please note, if you refuse cookies this may mean that you can't use some of the additional features of our website and may not be able to access certain parts of the website.

## 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 as provided 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 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 Digital Properties, and these amendments will become effective upon posting. Your continued use of the Digital Properties 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.

## 9. To contact our Privacy Officer

If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

**By Email:** [privacy-officer@spuul.com](mailto:privacy-officer@spuul.com)

## By Mail:

Data Protection Officer

Spuul Pte Limited

41 Tembeling Road Singapore

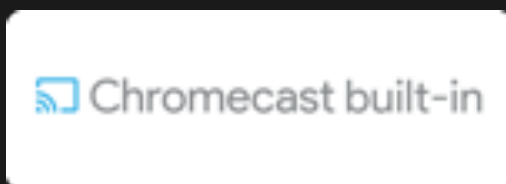
423584

For the purposes of the GDPR, our Privacy Officer is also our Data Protection Officer (DPO).

***We will respond to all requests, inquiries or concerns within thirty (30) days.***

If you are in the European Union, you can choose to instead lodge a complaint with your local Data Protection Authority (DPA). The list of DPAs is at [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

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