

WATCHA, Inc.

PRIVACY POLICY

Last updated: August 6, 2018.

This Privacy Policy governs how Watcha, Inc. (the “Company”, “we”, “our” or “us”) uses Personal Information (defined below) that it collects, receives and stores about you in connection with your use of Company’s website <http://www.watcha.com/> and any other website or application that Company operates in order to deliver the Watcha, Watcha Play and Watcha-related services (collectively the “Services”).

The Company complies with all applicable laws, and notifications, directives, guidelines, etc. enacted by national and other authorities, relating to the protection of personal information, including the main laws relating to the personal information protection, which are the Personal Information Protection Act and the Act on Promotion of Information and Communications Network Utilization and Information Protection Act (the "IT Network Act").

You may choose whether or not to provide or disclose Personal Information in connection with your use of the Services. If you choose not to provide the Personal Information we request, you may still visit and use parts of the Service, but may be unable to access or use certain features, options, or programs.

1. Introduction

Company is committed to respecting privacy and recognizes the need for appropriate protection and management of any Personal Information that is shared with us as part of using the Services. As used in this Privacy Policy, "Personal Information" means any information that may be used, either alone or in combination with other information, to personally identify an individual.

2. Changes to this Privacy Policy

Company reserves the right, at its discretion, to change the terms of this Privacy Policy at any time. You can see when this Privacy Policy was last updated by reviewing the “Last Updated” legend on the top of this page. Company may provide you with notice of material changes to the Privacy Policy as appropriate under the circumstances.

UNLESS OTHERWISE INDICATED, ANY CHANGES TO THIS PRIVACY POLICY WILL APPLY IMMEDIATELY UPON POSTING TO OUR SITE.

3. Scope and Method of Collection of Personal Information

3.1. The Company may gather the following Personal Information for the purpose of providing the Service or because we are legally required to do so. If you do not provide the Personal Information we request, we may not be able to provide you with the Services. The Personal Information we and our service providers collect includes but is not limited to:

- Your full name, email address, address, date of birth and gender, local citizen or foreigner, I-pin number (only for I-pin users), cell phone number, any linked information (CI) and duplicate information (DI).

3.2. The Company may gather and use the Personal Information in the following ways:

- Contact Information: In various areas of our Service and in printed materials, we provide you the opportunity to submit a form with basic contact information, such as your name, email, or mailing address. With your permission, Company uses such information to inform you of new products, technical information and services, and upcoming events that may be of interest. If you no longer wish to receive these emails, the opt-out process is described in Section of this Privacy Policy.

In addition, if you choose, you may participate in a Company e-mail list server by subscribing within our Service or by contacting our staff directly. You may unsubscribe from these e-mail list servers by following the unsubscribe instructions found within the list email.

- Member Login Information: We process your username and password to enable you to securely log into our Service. We process this Personal Information only as necessary to provide you with the Services under our [Terms of Use] and to further our legitimate interests in protecting our Services and content.

- Membership Information: We use information provided through membership forms to process membership applications and related requests. For example, Company may use Personal Information for purposes of self-verification for use of the membership Service, identification of individual members, prevention of unfair use by unqualified individuals, prevention of unauthorized use, confirmation of duplicate subscription, keeping of records for adjustment of disputes, handling of complaints and delivery of notifications.

- Payment Information: When you purchase services or products from us, third-party service providers acting on our behalf process payment information, including credit card information, and billing and shipping addresses. Any Personal Information collected by such third party will be subject to the third party's privacy policy,

- Information Collected through Various Forms: The Company and its service providers may gather Personal Information in a variety of ways, including: (i) when you participate in events and promotional activities; (ii) through the use of our Services, e.g., when you sign up for a newsletter or make a purchase; (iii) offline, such as when you attend one of our conventions or contact customer service; or (iv) from other sources, such as public databases, joint marketing partners, social media platforms (including from people with whom you are friends or otherwise connected) and from other third parties. In addition, if you elect to connect your social media account to our Services, certain Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your profile or your friends' profiles.

- Social Media: We have worked with certain third-party social media providers to offer you their social networking services through our Services. For example, you can use third-party social networking services, including but not limited to Facebook, Twitter, LinkedIn, and others to share information about your experience on our Services with your friends and followers on those social networking services. These social networking services may be able to collect information about you, including your activity on our Services. These third-party social networking services also may notify your friends, both on our Services and on the social networking services themselves, that you are a

user of our Services or about your use of our Services, in accordance with applicable law and their own privacy policies. If you choose to access or make use of third-party social networking services, we may receive information about you that you have made available to those social networking services, including information about your contacts on those social networking services.

You also may be able to link an account from a social networking service (e.g., Facebook) to an account through our Services. This may allow you to use your credentials from the other site or service to sign in to certain features on our Services. If you link your account from a third-party site or service, we may collect information from those third-party accounts, and any information that we collect will be governed by this Privacy Policy.

Our Services provide Social Media Features (“Features”), such as the Facebook Like button, and widgets such as the “Share” button or interactive mini-programs that run on our site (“Widgets”). These Features may collect your IP address, which page you are visiting on our Services, and may set a cookie to enable the Feature to function properly. Features and Widgets are either hosted by a third party or hosted directly on our Services. Your interactions with these Features and Widgets are governed by the privacy policy of the company providing it.

3.3. Personal Information You Disclose Relating to Others

If you disclose any Personal Information relating to other people to use or to our service providers in connection with our Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

3.4. Information Collected Automatically The following information may be generated and collected automatically in the course of using the Service. We have a legitimate interest in using such information to assist in log-in, systems administration purposes, information security and abuse prevention, to track user trends, and to analyze the effective of our Services. Alone or in combination with other information, such automatically collected information may constitute Personal Information. Some of our service providers (described in Section below) may use cookies or other methods to gather information regarding your use of our Services. Such third parties may use these cookies or other tracking methods for their own purposes by relating information about your use of our Services with any Personal Information about you that they may have. The use of such information by a third party depends on the privacy policy of that third party.

- Log files on our Services: PC MacAddress, PC specifications, browser type, program version required in using the Service, Internet Service Provider, date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.

Cell phone (smart phone) & mobile devices (including tablet PC) loaded with smart OS: Model name, proper number per device (UDID, IMEI, etc.), OS information, mobile carrier, Google/Apple advertising ID

Other information: Record of use (suspension) of the Service, access log, access internet protocol (“IP”) address information.

- Cookies: We use cookies to make interactions with our Services easy and meaningful. When you visit our Services, our servers may send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your web browser. Unless you choose to identify yourself to us, either by responding to a promotional offer, opening an account, or filling out a web form, you remain anonymous to us.

We may use cookies that are session-based and persistent-based. Session cookies exist only during one session. They disappear from your computer when you close your browser software or turn off your computer. Persistent cookies remain on your computer after you close your browser or turn off your computer. Please note that if you disable your web browser's ability to accept cookies, you may not be able to successfully use all of the features of our Services.

The following sets out how we may use different categories of cookies and your options for managing cookie settings:

Required cookies enable you to navigate our Services and use its features, such as accessing secure areas of our Services.

If you have chosen to identify yourself to us, we use cookies containing encrypted information to allow us to uniquely identify you. Each time you log into our Site, a cookie containing an encrypted, unique identifier that is tied to your account is placed on your browser. These cookies allow us to uniquely identify you when you are logged into our Site and to process your online transactions and requests.

Because required cookies are essential to operate our Services, there is no option to opt out of these cookies.

These cookies collect information about how you use our Services, including which pages you go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. All information these cookies collect is aggregated and anonymous. It is only used to improve how our Service functions and performs.

From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit our Services. We may also utilize Flash cookies for these purposes.

To learn how to opt out of performance cookies using your browser settings [click here](#).

To learn how to manage privacy and storage settings for Flash cookies [click here](#).

Functionality cookies allow our Service to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of our Service after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize.

We may use local shared objects, also known as Flash cookies, to store your preferences or display content based upon what you view on our Service to personalize your visit.

To learn how to opt out of functionality cookies using your browser settings [click here](#).

To learn how to manage privacy and storage settings for Flash cookies [click here](#).

From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit our Services. We sometimes use cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited our Services. The information provided to third parties does not include Personal Data, but this information may be re-associated with Personal Data after we receive it.

By way of example, as you browse our Services, advertising cookies may be placed on your computer so that we can understand what you are interested in. Our advertising partners then enable us to present you with retargeted advertising on other sites based on your previous interaction with our Services.

We also contract with third-party advertising networks and similar partners that collect IP addresses and other information from web beacons (see below) on our Services, from emails, and on third-party sites. Ad networks follow your online activities over time by collecting Service Navigational Information through automated means, including through the use of cookies. They use this information to provide advertisements about products and services tailored to your interests. You may see these advertisements on other websites. This process also helps us manage and track the effectiveness of our marketing efforts.

Third parties, with whom we partner to provide certain features on our Service or to display advertising based upon your web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.

To learn more about these and other advertising networks and their opt out instructions, [click here](#).

To learn how to manage privacy and storage settings for Flash cookies [click here](#).

-Other Tracking Technologies. When you visit our Services, we may collect your IP address for certain purposes such as, for example, to monitor the regions from which you navigate our Services. We may also use web beacons alone or in conjunction with cookies to compile information about your usage of our Services and interaction with emails from us. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular site tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when you click on a link in the email that directs you to our Service. We may use web beacons to operate and improve our Services and email communications.

-Analytics Software Tools. We use Google Analytics on our Services to help us analyze the traffic on our Service. For more information on Google Analytics' processing of Personal Data, please see <http://www.google.com/policies/privacy/partners/>. By using a browser plugin <http://www.google.com/ads/preferences/plugin/> provided by Google, you can opt out of Google Analytics.

3.5. The Purposes For Which We Use Personal Information

If you submit or we collect Personal Information through our Services, then such Personal Information may be used in the following ways: (i) to provide, analyze, administer, and improve our Services, (ii) to contact you in connection with our Services, notifications, events, programs or offerings that you may have registered for, (iii) to send you updates and promotional materials that you have registered for, (iv) to identify and authenticate your access to the parts of our Services that you are authorized to access; (v) for recruiting and human resources administration