

Privacy Policy

(Last updated on 10th Jun 2020)

PT. Surya Agung Manunggal Perkasa and its affiliates (collectively “PT. SAMP” “we” or “us”) respects the privacy of everyone that use our Application and various related services. This privacy policy is designed to inform you about the type of information that we gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of that information.

You acknowledge that this Privacy Policy is part of our Terms of Service. Capitalized terms not otherwise defined herein shall have the same meaning as defined in the Terms of Service (the “Terms”).

BY ACCESSING AND USING OUR SERVICES, YOU AGREE TO BE BOUND BY ALL OF TERMS AND CONDITIONS SET FORTH IN THIS PRIVACY POLICY.

We may amend, at our discretion, any portion of this Privacy Policy at any time by posting the amended Privacy Policy within our Applications. You will be deemed to have accepted such amendments by continuing to use our Services. Except as otherwise stated, any such amendments will be automatically effective 30 calendar days after they are initially posted.

1. What information do we collect from you?

- Data we collect from you

Personally Identifiable Information: This refers to information that let us know the specifics of who you are. Only when you engage in registering your user account and exchanging your shopping invoice/receipt with the rewards offered (lucky draw numbers and tokens), we may ask you to provide certain information about yourself. It is required for you to fill the information prior to doing any subsequent activities within our Applications.

If you elect to engage in those activities, we may ask that you provide us personal information. Such information may include but not limited to your name (real name), e-mail address, telephone number, and pictures of your invoices/receipts and their corresponding items purchased. Your citizen card ID and its picture will be strictly required for us to maintain the integrity of lucky draw participations.

Usage Information: We collect details of your use of our Services and the resources that you access. Such usage information may include information about how and when you access or use our Services.

Technical Information: We kept a record of the devices you used to login into our Applications. If you contact us or respond to messages and communications that we send to you, we may keep a record of that correspondence.

Customer Support Correspondence: When you contact our customer support team for assistance, we may ask for your name and contact information and any other information needed or relevant to assist you with your inquiry, including without limitation any transactions you made.

Cookies: We collect technical information and usage data, which may be linked and identified with your account, by using cookies and other tracking technologies. We may use cookies to store certain types of information each time you use our Services. To find out more about how we use cookies,

please review the additional information in this Privacy Policy under the Section entitled “Do we use cookies or other tracking technologies?”

- Data we collect from third parties.

Information We Collect from Third Parties: We receive information about you from third parties (i) when you choose to sign in to our Applications using a third-party social network account (such as Facebook, Google, etc). The information we receive from such third parties may include your name, user name, photographs and other biographic information, device identifier, and network service account number assigned by such third party. You should review the terms of service and privacy policies of such third parties and understand how they treat your data and what data they might share with us.

2. How do we use the information collected?

We use the information collected from you solely relating to providing our Services and information about our Services.

The use of camera in our application will only facilitate all activities involving pictures collection previously stated in Personally Identifiable Information.

3. Do we use cookies or other tracking technologies?

We use cookies and similar technologies to facilitate and customize your use of our Services. A cookie is a small data file, which we store on your computer or mobile device that can later be retrieved to identify you to us. We may use cookies and similar technologies, among other things, to:

(a) allow us to recognize you and your device;

(b) allow our Services to interact with a third-party platform (where you have chosen to allow such interaction);

4. With whom do we share your information?

Generally: We do provide some of our Services through contractual arrangement with affiliates, services providers, and other third parties (collectively, “Service Providers”).

We will share your personal information with our Service Providers for all purposes described in Section entitled “How do we use the information collected?” and as reasonably necessary in order to provide the Services to you or to carry out your instruction (for example, logging in with your social media account). When our Service Providers collect or receive personal information, we require them to use such information only on our behalf and for purposes consistent with this Privacy Policy.

Sharing of Non-Personally Identifiable Information: We will not share any non-personally identifiable information about users (where your data is on an anonymous and aggregated basis) to third party companies, including but not limited to third party advertisers, consultants, service providers and our affiliates.

Business Transfer: In a business transaction, such as a merger, acquisition, dissolution (including bankruptcy), change of control, or a sale of all or a portion of our assets, customer information, including personally identifiable information, generally is one of the transferred business assets. In the event that PT. SAMP undergoes such transactions, including preparation of any of such transactions, we may share, disclose or transfer all of your information, including personal information, to the successor. Any third party to which we transfer or sell our assets will have the

right to continue to use the personal and other information that you provide to us in the manner set out in this Privacy Policy. We will not sell or rent your information to any third party outside of these circumstances.

Compliance with Legal Obligations: Occasionally we may be required by law to disclose personally identifiable information. For example, we disclose such information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. We fully cooperate with law enforcement agencies in identifying those who use our Services for illegal activities. We reserve the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

5. How do we keep your information secure?

The security of your personal information is important to us. We maintain appropriate technical and physical safeguards to protect your personal information against unauthorized access, loss and misuse. We take commercially reasonable security measures to protect your personal information, including encryption of sensitive information using Secure encryption algorithm.

Although we take appropriate measures to safeguard against unauthorized disclosure or access of your information, no security measure is perfect. Thus, we cannot guarantee the security of your information. You hereby agree to use our Services at your own risk. We do not assume any responsibility for the unauthorized use or access of your information under our control.

6. Where do we hold your information?

Your personal information may be transferred to, and stored at, a destination outside of your country or jurisdiction, using MongoDB Atlas service. It may also be processed by personnel of our affiliates and third-party service provider who may operate outside of your country or jurisdiction. In such case, we will take reasonable steps to require such third party in possession of your personal information to take commercially reasonable security measures to protect the information. On the other hand, the data and privacy protection laws of other countries may not be as comprehensive as those laws in your country of residence. By using our Services, you consent to your personal information being transferred to recipients in other countries and being stored and processed in the servers located in other countries.

7. How can you review, correct or delete your personally identifiable information?

You can request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, you could view every personal information we store in your own Application on profile page.

We want to make sure that your personal information is accurate and up to date. You may also update your account information by logging into your account.

You may request to delete your personal information by contacting our Customer Support to process your request. We may ask you for certain personal information to confirm your identity before processing your request. Please note that before we process your deletion request, we will ask you to verify your account information or log into the account you wish to delete to confirm your identity.

Please be aware that we may not be able to delete your information in some cases. For example, we cannot correct or delete any information that you have shared on any third-party social network or

platform. In addition, any information that is saved in aggregate form or that cannot, in our sole discretion, be removed without undue burden to us may not be deleted.

Moreover, we may not be able to delete your information if retention of your information is necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and exercise or defend against a legal claim. Such information may be disclosed pursuant to this Privacy Policy regardless of whether you have terminated your account or deleted your information.

Any third-party platform that you use to access the Services may also retain backup copies of your information even after your account is deleted or terminated and may use them subject to their policies.

If you are a resident of California or an EU resident, you can find your privacy rights under "14. California Privacy Rights" or "16. EU Data Protection Rights."

8. What are your choices regarding collection, use and distribution of your information?

We will not use your personal information for marketing purposes. However, you have no choice to decide the information sharing between our Service Providers since it is deemed necessary to ensure your smooth access to our Services.

9. What should you know about privacy policies and data collection at any third party sites accessible from our Services?

Except as otherwise discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Other sites accessible through our Applications have their own privacy policies and data collection, use and disclosure practices. Please consult each site's privacy policy. We are not responsible for the policies or practices of third parties.

Some parts of our Services are provided by a third-party Service Providers, who may collect and record information about your use of our Services. Additionally, other companies that place advertisements on our Websites may collect information about you when you view or click on their advertising through the use of links. We cannot control the activities of such third parties and cannot guarantee that they will adhere to the privacy and security practices same or similar to ours. You should contact them directly if you have any questions about their use of the information that they collect.

10. How long do we retain your personal information?

We will retain your personal information for the purpose for which it was collected to provide you with Services. We may retain your personal information even after you have closed your account with us or we have ceased providing Services to you, if retention of your personal information is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes, prevent fraud, cheating or abuse, or enforce this Privacy Policy or any other agreement we may have with a user.

11. Our Policy Concerning Children

As used herein, the "child" or "children" means under the age of 13, and the term "parent" includes legal guardians.

We do not provide any special treatment for children under the age of 13 that identifies their age; we are the sole Content Creator of the shopping centre loyalty platform and we promised not to expose inappropriate contents.

However, we do require children under the age of 13 to be supervised by their parents when using our Services. Please pay attention if any decision such as purchasing coupons, editing your profile, and other information is inserted by an underage child; We will process such actions generally the same with any other incoming actions from non-children.

12. Modification to This Policy

From time to time, we may update this Privacy Policy to clarify our practices or to reflect new or different privacy practices, such as when we add new features. We reserve the right to modify and/or make changes to this Privacy Policy at any time.

If we make any material change, we will notify you via a notice on our home page or by other appropriate means of enhanced notice if we are required by applicable laws. Changes to this Privacy Policy will become effective 30 calendar days after they are initially posted on our home page unless we state otherwise in writing. We may update this Privacy Policy from time to time, so you should review this Privacy Policy regularly to ensure you are familiar with any change to it. We will show the "last updated date" at the top of this Policy when we update it. Your continued access or use of our Services, including any of Services available through any third-party platforms, after the effective date of the policy update will be deemed an acceptance of and an agreement to the Privacy Policy as changed.

13. International Transfer

All personal information that PT. SAMP collects is stored and transferred to a data center outside your country is using secure cryptographic communication at the collection stage.

14. Your California Privacy Rights

California residents have the right to make the following requests, up to twice every 12 months:

(a) The right to request category or specific pieces of personal information PT. SAMP has collected about You.

(b) The right to request that PT. SAMP disclose what personal information we collect, use, disclose, or sell.

(c) The right to request that PT. SAMP delete personal information that PT. SAMP has collected about You (subject to certain exceptions).

(d) The right to opt out of the sale of Your personal information.

- "Do not sell my personal information"

The California Consumer Privacy Act gives residents of the US state of California the right to prevent businesses from selling their personal information to third parties.

We may share your personal information with third parties who help us to verify your login credentials. Under the CCPA, this type of sharing of information could be deemed a "sale".

- Advertising partners Privacy Policy

We do not "sell" your personal information to third parties for any purpose.

15. Privacy Rights for California Minors

California residents under the age of 18 have the right to request removal of any content or information that he or she posted anywhere within our Services, such as public forum or message boards in our Websites or Applications.

Please be aware that the removal of your information or content may not be complete or comprehensive, and residual copies of such removed information or content may remain on our servers. In addition, we are not obligated to remove any posted content or information that has been copied or reposted by a third party, that has been rendered anonymous, or that we are required to keep by law.

16. EU Data Protection Rights

Only the minimum required personal information of users in the EU domain will be collected in order to provide the Services, and any other information will be collected only with the consent of the user. You have the right to object to the way your personal information is processed by PT. SAMP by contacting PT. SAMP's Privacy Protection Department. Residents of EU Member States may contact PT. SAMP's Privacy Protection Department for any unreasonable treatment that exceeds the time or other limits required by law. You may also be able to request judicial relief from the authorities in certain situations.

Comments or inquiries about this EU Data Protection Rights, requests to update information we have about Representatives, or requests to exercise GDPR data privacy rights, please visit: <https://gdpr-rep.eu/q/11288769>

17. Our Contact Information

If you have a question or complaint about our Privacy Policy or any of our privacy practices, please feel free to contact us by sending an email to PT. SAMP App developer contact.