

## ELU VERSE

### PRIVACY POLICY

#### International and EU GDPR

Laboon Pte. Ltd., a company registered in Singapore, 68 Upper Serangoon View, #11-24 Kingsford Waterbay, 533884 Singapore (the "Company"), declares the following Privacy Policy, confirming that every defined word or term has the same meaning and purpose as stated in its relevant Website Terms and Conditions ("T&Cs"), in relation to:

- I. any information the Company collects about the User when he/she visits the Company's Website, and/or otherwise interacts with any member of the Company's Team;*
- II. how the Company uses, shares, stores, and secures the information; and*
- III. how the User may access and control that information.*

#### **1. User Information.**

- 1.1. The Company may collect any "**Personal Information**", which is any data, information, or combination of data and information that is provided by the User to the Company, or through the use of the Company's Website and that relates to an identifiable individual.
- 1.2. The Company collects the Personal Information when it is provided by the User or when the User visits the Website.
- 1.3. The Company does not collect sensitive data or special category data about the User. This includes details about race, ethnic origin, politics, religion, trade union membership, genetics, biometrics, health, or sexual orientation.

#### **2. Information Usage.**

- 2.1. The Company will only use any Personal Information that the applicable law allows to and in particular:
  - 2.1.1. to provide customer support and personalised features, and to protect the safety and security of the Website;
  - 2.1.2. to satisfy a legitimate interest which is not overridden by the User's fundamental rights or data protection interests, for example for research and development, and in order to protect the Company's legal rights and interests;
  - 2.1.3. when the User consents to do so for a specific purpose;
  - 2.1.4. when the Company needs to comply with a legal or regulatory obligation.
- 2.2. When the User has given consent to use any Personal Information for a specific purpose, he/she has the right to withdraw said consent at any time by contacting the Company, but this will not affect any use of the Personal Information that has already taken place.
- 2.3. The Company does not share any Personal Information with any company outside its own group, if applicable, for marketing purpose, unless there is an express specific consent to do so.
- 2.4. For visitors to or users of the Website who are located in the European Union, the legal bases for processing their information is published in the Legal Bases Table at the end of this Policy under Clause 9.

### **3. Information Sharing.**

- 3.1. The Company may share Personal Information with third parties that helps it operate, provide, support, improve, and market its Website, products and services, for example third-party service providers who provide website and application development, data storage and backup, infrastructure, payment processing, customer support, business analytics, Anti-Money Laundering ("**AML**") and Know Your Customer checks ("**KYC**") and other relevant services.
- 3.2. Third-party service providers have access to the Personal Information only for the purpose of performing their services and in compliance with applicable laws and regulations. These third-party service providers are required to maintain confidentiality and security of all Personal Information that they process on the Company's behalf and to implement and maintain reasonable security measures to protect the confidentiality, integrity, and availability of any Personal Information.
- 3.3. The Company takes reasonable steps to confirm that all third-party service providers process Personal Information in a manner that provides at least the same level of protection as is provided under this Privacy Policy. Where any third-party service provider is unable to satisfy these requirements, any reasonable steps to prevent or stop non-compliant processing will be taken.
- 3.4. The Company may share Personal Information on aggregated or de-identified basis with third parties for research and analysis, profiling, and similar purposes to help the improvement of products and services.
- 3.5. If the Users use any third-party software in connection with our products or services, third-party software providers can gain access to the Personal Information. Policies and procedures of thirdparty software providers are not controlled by the Company, and this Privacy Policy shall not cover how any Personal Information is collected or used by third-party software providers. The User is encouraged to review the privacy policies of third-party software providers before using third-party software.
- 3.6. The Website may contain links to third-party websites over which the Company has no control. If the Users follow a link to any of these websites or submit information to them, any Personal Information will be governed by their policies. We encourage the User to review the privacy policies of third-party websites before submitting any information to them.
- 3.7. The Company may share any Personal Information with government and law enforcement officials to comply with applicable laws or regulations.

### **4. Information Storage**

- 4.1. All Personal Information provided by the User is stored on the Company's servers or on third-parties server to which only the Company has access to within the boundaries of relevant laws and regulations.
- 4.2. The Company only retains Personal Information for so long as it is reasonably necessary to fulfil the purposes they were collected for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

### **5. International Transfer of Information**

- 5.1. The Company collects any Personal Information globally and transfers, process, and stores any Personal Information outside the User's country of residence where the Company's or any third-party service providers operate for the purpose of providing the products and services.
- 5.2. Some of the countries in which the Company or third-party service providers are operating or are located may not have the privacy and data protection laws that are equivalent to those in the User's country of residence. When Personal

Information is shared with these companies or third-party service providers, use is made of contractual clauses, corporate rules, and other appropriate mechanisms to safeguard the transfer of any Personal Information.

## **6. User's rights**

6.1. The User has the following right to:

- 6.1.1. be informed of what the Company does with the relevant Personal Information;
- 6.1.2. request a copy of relevant Personal Information the Company holds;
- 6.1.3. require the Company to correct any inaccuracy or error in any Personal Information held; 6.1.4. request erasure of any relevant Personal Information, except the one held for record keeping purposes, to complete transactions, or to comply with legal obligations);
- 6.1.5. object to or restrict the processing of any relevant Personal Information (including for marketing purposes);
- 6.1.6. request to receive some of the relevant Personal Information in a structured, commonly used, and machine readable format, and request that it is transferred to another party; and
- 6.1.7. withdraw consent at any time where the Company is relying on consent to process the relevant Personal Information (although this will not affect the lawfulness of any processing carried out before such consent withdrawal).

6.2. The Platform and the App enable Users to update certain information about themselves.

6.3. The User may opt out of receiving marketing materials from the Company by expressly contacting it. However the User will continue to receive notifications or information that are necessary for the use of the Company's products or services.

6.4. As a security measure, the Company may need specific information from the User to help confirm his/her identity when processing any privacy requests or when you exercise the rights stated in this Clause.

6.5. Any request under paragraph 6.1 will normally be addressed free of charge. However, the Company may charge a reasonable administration fee if the request is clearly unfounded, repetitive, or excessive.

6.6. The Company will respond to all legitimate requests approximately within one (1) month. Occasionally, it may take longer than one (1) month if the request is particularly complex or if the users have made a number of requests.

## **7. Policy Changes**

7.1. The Company reserves the right to amend this Privacy Policy from time to time by posting the updated Privacy Policy on the Website. By continuing to use the Company's Website after the changes come into effect, the User agrees to be bound by the revised policy.

## **8. Children Privacy Policy**

8.1. The Company's products and services are not directed or intended for individuals not major of age in their Country of residence. The Company does not knowingly collect any personal information from individuals not major of age and if this will be detected, steps will be taken to delete such information.

## **9. European Union Users - GDPR**

9.1. If the User is visiting the Company's Website from the European Union ("EU"), that may differ from privacy laws under other jurisdictions. The User acknowledges that he may be transferring relevant Personal Information to the Company for storage and processing in other Countries around the world for the purposes described under this Privacy Policy. The Company takes the utmost care in protecting any relevant Personal Information and have put in place adequate mechanisms to protect it when it is transferred internationally.

9.2. The Legal Basis for collecting and using any relevant Personal Information if the User is a citizen or resident of the EU, will depend on the Personal Information concerned and the specific context in which it is collected:

- **Performance of a contract.** The use of any relevant Personal Information may be necessary to perform the terms and conditions or other policies under which we operate our Website.
- **Consent.** The User consent is needed if technical information such as cookie data and geolocation data is necessary; and any relevant Personal Information is used for marketing purposes. The User may withdraw his/hers consent at any time by contacting the Company directly.
- **Legitimate interests.** The Company may use any Personal Information for its legitimate interests to improve its Website, for security purposes, and fraud prevention, and to share information with any affiliates for internal administration. In such circumstances the Company ensures that these interests are not overridden by the User's data protection interests or fundamental rights and freedoms.

### 9.3. Legal Basis Table

Processing purpose	Type of data processed	Legal basis
To enable the User to access products and services	Account Data, Transaction Data, Support Data, Technical Data [and User Contract performance Content]	
To administer and maintain he safety and security of the Website	the Technical Data	Contract performance
To study the usage of products or services	Transaction Data, Support Technical Data, Usage Data	Data, Legitimate interest to improve the Website
To gather feedback on products, services, or features	Account Data	Legitimate interest to improve the Website

### 9.4. Rights under EU law:

If the User's relevant Personal Information is subject to the protections offered by EU law, he/she may:

- Access, correct, update or request deletion of any relevant Personal Information, at any time by contacting the Company using the contact details provided on the Website (in accordance with applicable data protection laws) or writing to [hi@playelu.io](mailto:hi@playelu.io) provided that the Company may charge a reasonable fee for any manifestly unfounded, excessive or repetitive requests;
- Object to the processing of any relevant Personal Information, ask the Company to restrict processing of any relevant Personal Information or request portability of any relevant Personal Information for the legitimate interests set out above. In certain circumstances the Company may not be able to stop using the Personal Information, with motivated cause.
- Withdraw consent at any time if the Company collected and processed any relevant Personal Information with consent.

- Opt-out of any marketing communications that the Company (or any third party to whom the Company disclosed the Personal Information with consent) may send;
- Complain to a data protection authority about the Company's collection and use of any relevant Personal Information.

These rights apply only for Users who are subject to EU law.

9.5. The Company is the Data Controller in relation to its Website and is responsible for any relevant Personal Information, save for what pertains to other third-party service providers connected. The User may contact the Company through its Website or by writing to [hi@playelu.io](mailto:hi@playelu.io) if he/she has any concerns about this Policy and any relevant Personal Information.