**Privacy Policy (Last updated 20 October 2019)**

PT Timkado Sejahtera Indonesia, hereafter “TSI”, takes data privacy seriously. This privacy policy explains who we are, how we collect, share and use Personal Information, and how you can exercise your privacy rights.

We recommend that you read this privacy policy in full to ensure you are fully informed. However, to make it easier for you to review the parts of this privacy policy that apply to you, we have divided up the document into sections that are specifically applicable to Members (Section 2), Contacts (Section 3), and Visitors(Section 4). Sections 1 and 5 are applicable to everyone.

If you have any questions or concerns about our use of your Personal Information, then please contact us using the contact details provided at the end of Section 5.

1. The Basics

## **A. About Us**

DAISI is an online marketing platform (the "Services") licensed by PT Timkado Sejahtera Indonesia for sale and distribution in the country of Indonesia ("we," "us," "our," and "TSI").

The Services enable our Members to, among other things, send and manage messaging campaigns or serve advertisements using email, SMS, and applications such as Whatsapp, LINE, and Facebook Messenger. We also provide other related services, such as data analytics to improve the effectiveness of these marketing campaigns.

## **B. Key Terms**

In this privacy policy, these terms have the following meanings:

“Audience” is the person or persons that you want to read your message. Audiences may be defined by one or more distribution lists.

"Contact" is a person a Member may contact through our Services. In other words, a Contact is anyone on a Member's Distribution List or about whom a Member has given us information. For example, if you are a Member, a subscriber to your email marketing campaigns would be considered a Contact.

"Distribution List" is a list of Contacts a Member may upload or manage on our platform and all associated information related to those Contacts (for example, email addresses).

"Member" means any person or entity that is registered with us to use the Services.

"Personal Information" means any information that identifies or can be used to identify a Member, a Contact, or a Visitor, directly or indirectly. Examples of Personal Information include, but are not limited to, first and last name, date of birth, email address, gender, occupation, or other demographic information.

"Website(s)" means any website(s) we own and operate (such as daisi.id) or any web pages, interactive features, applications, widgets, blogs, social networks, social network "tabs," or other online, mobile, or wireless offerings that post a link to this privacy policy.

"Visitor" means any person who visits any of our Websites.

"you" and "your" means, depending on the context, either a Member, a Contact, or a Visitor.

2. Privacy for Members

This section applies to the Personal Information we collect and process from a Member or potential Member through the provision of the Services. In this section, "you" and "your" refer to Members and potential Members.

## **A. Information We Collect**

The Personal Information that we may collect broadly falls into the following categories:

(i) Information you provide to us: In the course of engaging with our Services, you may provide Personal Information about you and your Contacts. Personal Information is often, but not exclusively, provided to us when you sign up for and use the Services, consult with our customer service team, send us an email, integrate the Services with another website or service (for example, when you choose to connect your e-commerce account with TSI), or communicate with us in any other way.

We will let you know prior to collection whether the provision of Personal Information we are collecting is compulsory or if it may be provided on a voluntary basis and the consequences, if any, of not providing the information. By giving us this information, you agree to this information being collected, used and disclosed as described in this privacy policy.

This information may include:

* Registration information: You need a TSI account to use the Services as a Member. When you register for an account, you will be asked to provide certain basic information, such as your name, email address, username, password, company name, occupation, location, and phone number (for example, if you are using two-factor authentication).
* Billing and communications information: If you purchase our Services, you may also need to provide us with payment and billing information, such as your credit card details and billing address. TSI will also maintain a record of your billing transactions and purchases, and any communications and responses.
* Information we process on your behalf: In order to send a messaging campaign or use certain features in your account, you need to upload a Distribution List that provides us information about your Contacts, such as their names and email addresses. We use and process this information to provide the Services in accordance with your instructions.

(ii) Information we collect automatically: When you use the Services, we may automatically collect certain information about your device and usage of the Services. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below.

This information may include:

* Device information: We collect information about the device and applications you use to access the Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
* Log data: Our web servers keep log files that record data each time a device accesses those servers and those log files contain data about the nature of each access, including originating IP addresses. We may also access metadata and other information associated with files that you upload into our Services.
* Product usage data: We collect usage data about you whenever you interact with our Services, which may include the dates and times you access the Services and your browsing activities (such as what portions of the Services are used). We also collect information regarding the performance of the Services, including metrics related to the deliverability of emails and other communications you send through the Services. This information allows us to improve the content and operation of the Services and facilitate research and analysis of the Services.

(iii) Information we collect from other sources: From time to time, we may obtain information about you or your Contacts from third-party sources, such as public databases, social media platforms, third-party data providers and our joint marketing partners. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us.

* Examples of the information we receive from other sources include demographic information (such as age and gender), device information (such as IP addresses), location (such as city and state), and online behavioral data (such as information about use of social media websites, page view information and search results and links). We use this information, alone or in combination with other information (including Personal Information) we collect, to enhance our ability to provide relevant marketing and content to you and to develop and provide you with more relevant products, features, and services.

(iv) Information from the use of our applications: When you use our applications, we may collect certain device and usage-related information in addition to information described elsewhere in this privacy policy.

* Device information: We may collect information about the type of device and operating system you use. We do not ask for, access, or track any location-based information from your mobile device at any time while downloading or using our mobile apps or Services.
* Product usage data: We may use analytics software (such as Google Analytics) to better understand how people use our application. We may collect information about how often you use the application and other performance data.

## **B. Use of Personal Information**

We may use the Personal Information we collect through the Services or other sources for a range of reasons, including:

* To bill and collect money owed to us by you. This includes sending you emails, invoices, receipts, notices of delinquency, and alerting you if we need a different credit card number. We use third parties for secure credit card transaction processing, and those third parties collect billing information to process your orders and credit card payments. To learn more about the steps we take to safeguard that data, see the "Our Security" section of this privacy policy.
* To send you system alert messages. For example, we may inform you about temporary or permanent changes to our Services, such as planned outages, or send you account, security or compliance notifications, such as new features, version updates, releases, abuse warnings, and changes to this privacy policy.
* To communicate with you about your account and provide customer support. For example, if you use our mobile apps, we may ask you if you want to receive push notifications about activity in your account. If you have opted into these push notifications and no longer want to receive them, you may turn them off through your operating system.
* To facilitate or enable any checks as we may in our discretion consider necessary before we register you as a Member, including any know-your-customer (“**KYC**”) processes;
* To enforce compliance with our Terms of Use and applicable law, and to protect the rights and safety of our Members and third parties, as well as our own. This may include developing tools and algorithms that help us prevent violations. For example, sometimes we review the content of our Members’ email campaigns to make sure they comply with our Terms of Use. To improve that process, we have software that helps us find email campaigns that may violate our Terms of Use. Our employees or independent contractors may review those particular email campaigns. This benefits all Members who comply with our Terms of Use because it reduces the amount of spam being sent through our servers and helps us maintain high deliverability. Email and messaging services such as Whatsapp not necessarily built for confidential information. Please do not use TSI to send confidential information.
* To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
* To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
* To prosecute and defend a court, arbitration, or similar legal proceeding.
* To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
* To provide, support and improve the Services. For example, this may include sharing your or your Contacts’ information with third parties in order to provide and support our Services or to make certain features of the Services available to you. When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.
* To provide suggestions to you. This includes adding features that compare Members’ email campaigns, using data to suggest other publishers your Contacts may be interested in, or using data to suggest products or services that you may be interested in or that may be relevant to you or your Contacts. Some of these suggestions are generated by use of our data analytics projects, which are described below.
* For our data analytics projects. Our data analytics projects use data from TSI accounts, including Personal Information of Contacts, to provide and improve the Services. We use information like your sending habits and your Contacts’ details, so we can make more informed predictions, decisions, and products for our Members. You or your Contact can opt out of data analytics projects at any time by emailing us at legal@timkado.id For example, we use data from TSI accounts to enable product recommendation, audience segmentation, and predicted demographics features for our Members. We will act as a data controller to process data for our data analytics projects in reliance on our legitimate business interests of improving and enhancing our products and services for our Members. As always, we take the privacy of Personal Information seriously, and will continue to implement appropriate safeguards to protect this Personal Information from misuse or unauthorized disclosure.
* Combined information. We may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.
* To enable your use of the integrations and plugins you choose to connect to your TSI account. For instance, if you choose to connect a Google integration to your TSI account, we'll ask you to grant us permission to view and/or download, as applicable, your Google Sheets, Google Contacts, Google Analytics and Google Drive. This allows us to configure your integration(s) in accordance with your preferences. For example, if you wanted to use the Google Contacts integration to share the templates in your TSI account with contacts in your Google address book, we would need to access your Google Contacts to share the templates.
* Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes about which we will notify you.

## **C. Cookies and Tracking Technologies**

We and our partners may use various technologies to collect and store information when you use our Services, and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, we use web beacons in the emails we send on your behalf. These web beacons track certain behavior such as whether the email sent through the Services was delivered and opened and whether links within the email were clicked. They also allow us to collect information such as the recipient’s IP address, browser, email client type and other similar details. We use this information to measure the performance of your email campaigns, and to provide analytics information and enhance the effectiveness of our Services. Reports are also available to us when we send email to you, so we may collect and review that information.

## **D. Member Distribution Lists**

A Distribution List can be created in a number of ways, including by importing Contacts, such as through a CSV or directly from your email client. Your Distribution Lists are stored on a secure TSI server. We do not, under any circumstances, sell your Distribution Lists. If someone on your Distribution List complains or contacts us, we might then contact that person. You may export (download) your Distribution Lists from TSI at any time.

If we detect abusive or illegal behavior related to your Distribution List, we may share your Distribution List or portions of it with affected ISPs or anti-spam organizations to the extent permitted or required by applicable law.

## **E. Other Data Protection Rights**

You and your Contacts may have the following data protection rights:

* To access, correct, update or request deletion of Personal Information. TSI takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete and up to date. As a Member, you can manage many of your individual account and profile settings within the dashboard provided through the TSI platform, or you may contact us directly by emailing us at legal@timkado.id. You can also manage information about your Contacts within the dashboard provided through the TSI platform to assist you with responding to requests to access, correct, update or delete information that you receive from your Contacts.
* Similarly, if Personal Information is collected or processed on the basis of consent, the data subject can withdraw their consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent. If you receive these requests from Contacts, you can segment your lists within the TSI platform to ensure that you only market to Contacts who have not opted out of receiving such marketing.
* The right to complain to a data protection authority about the collection and use of Personal Information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection law. We may ask you to verify your identity in order to help us respond efficiently to your request. If we receive a request from one of your Contacts, we will either direct the Contact to reach out to you, or, if appropriate, we may respond directly to their request.

3. Privacy for Contacts

This section applies to the information we process about our Members’ Contacts as a data controller pursuant to our legitimate business interests, as explained in the "Legal Basis for Processing" section below. Our Services are intended for use by our Members. As a result, for much of the Personal Information we collect and process about Contacts through the Services, we act as a processor on behalf of our Members. TSI is not responsible for the privacy or security practices of our Members, which may differ from those set forth in this privacy policy. Please check with individual Members about the policies they have in place. For purposes of this section, "you" and "your" refer to Contacts.

## **A. Information We Collect**

The Personal Information that we may collect or receive about you broadly falls into the following categories:

(i) Information we receive about Contacts from our Members: A Member may provide Personal Information about you to us through the Services. For example, when a Member uploads their Distribution List or integrates the Services with another website or service (for example, when a Member chooses to connect their e-commerce account with TSI), or when you sign up for a Member’s Distribution List on a TSI signup form, they may provide us with certain contact information or other Personal Information about you such as your name, email address, address or telephone number. You may have the opportunity to update some of this information by electing to update or manage your preferences via an email you receive from a Member.

(ii) Information we collect automatically: When you interact with a messaging campaign that you receive from a Member or browse or purchase from a Member’s connected store, we may collect information about your device and interaction with a landing page. We use cookies and other tracking technologies to collect some of this information. Our use of cookies and other tracking technologies is discussed more below.

* Device information: We collect information about the device and applications you use to access emails sent through our Services, such as your IP address, your operating system, your browser ID, and other information about your system and connection.
* Product usage data: We collect usage data about you whenever you interact with emails sent through the Services, which may include dates and times you access emails and your browsing activities (such as what pages are viewed). We also collect information regarding the performance of the Services, including metrics related to the deliverability of emails and other electronic communications our Members send through the Services. This information allows us to improve the content and operation of the Services and facilitate research and analysis of the Services.

(iii) Information we collect from other sources: From time to time, we may obtain information about you from third-party sources, such as social media platforms and third-party data providers. We take steps to ensure that such third parties are legally or contractually permitted to disclose such information to us, and we use this information to provide publicly available social media information about you to Members who have enabled the "Social Profiles" feature in their TSI accounts.

## **B. Use of Personal Information**

We may use the Personal Information we collect or receive about you for our legitimate business interests, including:

* To enforce compliance with our Terms of Use and applicable law. This may include developing tools and algorithms that help us prevent violations.
* To protect the rights and safety of our Members and third parties, as well as our own. For example, sometimes we review the content of our Members’ email campaigns to make sure they comply with our Terms of Use. To improve that process, we have software that helps us find email campaigns that may violate our Terms of Use. Our employees or independent contractors may review those particular email campaigns, which may include your contact information. This reduces the amount of spam being sent through our servers and helps us maintain high deliverability.
* To meet legal requirements, including complying with court orders, valid discovery requests, valid subpoenas, and other appropriate legal mechanisms.
* To provide information to representatives and advisors, including attorneys and accountants, to help us comply with legal, accounting, or security requirements.
* To prosecute and defend a court, arbitration, or similar legal proceeding.
* To respond to lawful requests by public authorities, including to meet national security or law enforcement requirements.
* To provide, support and improve the Services. For example, this may include sharing your information with third parties in order to provide and support our Services or to make certain features of the Services available to our Members. When we share Personal Information with third parties, we take steps to protect your information by requiring these third parties to enter into a contract with us that requires them to use the Personal Information we transfer to them in a manner that is consistent with this privacy policy and applicable privacy laws.
* For our data analytics projects. Our data analytics projects use data from TSI accounts, including your Personal Information, to provide and improve the Services. We use information, like your purchase history, provided to us by Members, so we can make more informed predictions, decisions, and products for our Members. For example, we use data from TSI accounts to enable product recommendation, audience segmentation, and predicted demographics features for our Members. If you prefer not to share this data, you can opt out of data analytics projects at any time by emailing us at legal@timkado.id.
* Other purposes. To carry out other legitimate business purposes, as well as other lawful purposes.

## **C. Cookies and Tracking Technologies**

We and our partners may use various technologies to collect and store information when you interact with a Member’s messaging campaign or connected store, and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, we use web beacons in the landing pages we send on behalf of our Members. When you receive and engage with a Member’s campaign, web beacons track certain behavior such as whether the landing page accessed through the TSI platform was delivered and opened and whether links within the message were clicked. They also allow us to collect information such as your IP address, browser, email client type, and other similar details. We use this information to measure the performance of our Members’ messaging campaigns, and to provide analytics information and enhance the effectiveness of our Services.

## **D. Legal Basis for Processing**

We process Personal Information about you as a data controller as described in this section, where such processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. Our legitimate interests typically include: improving, maintaining, providing, and enhancing our technology, products and services; and ensuring the security of the Services and our Website.

**E. Other Data Protection Rights**

You may have the following data protection rights:

* To access, correct, update or request deletion of your Personal Information. TSI takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating or deleting your Personal Information, or altering your data, by submitting a request to us at legal@timkado.id. We will consider your request in accordance with applicable laws.

As described above, for much of the Personal Information we collect and process about Contacts through the Services, we act as a processor on behalf of our [Members](https://mailchimp.com/legal/privacy/#2._Privacy_for_Members). In such cases, if you are a Contact and want to exercise any data protection rights that may be available to you under applicable law or have questions or concerns about how your Personal Information is handled by TSI as a processor on behalf of our individual Members, you should contact the relevant Member that is using the TSI Services, and refer to their separate privacy policies.

If you no longer want to be contacted by one of our Members through our Services, please unsubscribe directly from that Member’s newsletter/mailing list or contact the Member directly to update or delete your data. If you contact us directly, we may remove or update your information within a reasonable time and after providing notice to the Member of your request.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

4. Privacy for Visitors

This section applies to Personal Information that we collect and process through our Websites and in the usual course of our business, such as in connection with our recruitment, events, sales and marketing activities. In this section "you" and "your" refers to Visitors.

## **A. Information We Collect**

(i) Information you provide to us on the Websites or otherwise: Certain parts of our Websites may ask you to provide Personal Information voluntarily. For example, we may ask you to provide certain Personal Information (such as your name, contact details, company name, profile information) in order to sign up for a free or paid TSI account, apply for a role with TSI, or otherwise submit inquiries to us. We may also collect Personal Information, such as your contact and job details and feedback, when you attend our events, take part in surveys, or through other business or marketing interactions we may have with you. You may choose to provide additional information when you communicate with us or otherwise interact with us, and we will keep copies of any such communications for our records.

The Personal Information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your Personal Information. We will also let you know prior to collection whether the provision of the Personal Information we are collecting is compulsory or may be provided on a voluntary basis and the consequences, if any, of not providing the information.

(ii) Information we collect automatically through the Websites: When you visit our Websites, we may also collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered Personal Information under applicable data protection laws.

Specifically, the information we collect automatically may include your IP address, your operating system, your browser ID, your browsing activity, and other information about your system and connection and how you interact with our Websites and other websites. We may collect this information as a part of log files as well as through the use of cookies or other tracking technologies.

## **B. Use of Personal Information**

We may use the information we collect through our Websites for a range of reasons, including:

* To provide, operate, optimize, and maintain our Websites.
* To send you information for marketing purposes, in accordance with your marketing preferences.
* For recruitment purposes if you have applied for a role with TSI.
* To respond to your online inquiries and requests, and to provide you with information and access to resources or services that you have requested from us.
* To manage our Websites and system administration and security.
* To improve the navigation and content of our Websites.
* To identify any server problems or other IT or network issues.
* To process transactions and to set up online accounts.
* To compile aggregated statistics about site usage and to better understand the preferences of our Visitors.
* To carry out research and development to improve our products and services.
* To customize content and layout of the Websites.
* To carry out other legitimate business purposes, as well as other lawful purposes.

In addition, we may combine Personal Information with other information we collect or obtain about you (such as information we source from our third-party partners) to serve you specifically, such as to deliver a product or service according to your preferences or restrictions, or for advertising or targeting purposes in accordance with this privacy policy. When we combine Personal Information with other information in this way, we treat it as, and apply all of the safeguards in this privacy policy applicable to, Personal Information.

## **C. Cookies and Tracking Technologies**

We use cookies and similar tracking technologies to collect and use Personal Information about you, including to serve interest-based advertising.

## **D. Other Data Protection Rights**

You have the following data protection rights:

* To access, correct, update, or request deletion of your Personal Information. TSI takes reasonable steps to ensure that the data we collect is reliable for its intended use, accurate, complete, and up to date. You may contact us directly at any time about accessing, correcting, updating, or deleting your Personal Information, or altering your data or marketing preferences by emailing us at legal@timkado.id. We will consider your request in accordance with applicable laws.
* Similarly, if we have collected and processed your Personal Information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. We may ask you to verify your identity in order to help us respond efficiently to your request.

5. General Information

## **A. How We Share Information**

We may share and disclose your Personal Information to the following types of third parties for the purposes described in this privacy policy (for purposes of this section, "you" and "your" refer to Members, Contacts, and Visitors unless otherwise indicated):

(i) Our service providers: Sometimes, we share your information with our third-party service providers, who help us provide and support our Services and other business-related functions.

For example, if it is necessary to provide Members something they have requested (like enable a feature such as Social Profiles), then we may share Members’ or Contacts’ Personal Information with a service provider for that purpose. Other examples include analyzing data, hosting data, engaging technical support for our Services, processing payments, and delivering content.

These third-party service providers enter into a contract that requires them to use your Personal Information only for the provision of services to us and in a manner that is consistent with this privacy policy.

(ii) Advertising partners: We may partner with third-party advertising networks and exchanges to display advertising on our Websites or to manage and serve our advertising on other sites and may share Personal Information of Members and Visitors with them for this purpose. We and our third-party partners may use cookies and other tracking technologies, such as pixels and web beacons, to gather information about your activities on our Websites and other sites in order to provide you with targeted advertising based on your browsing activities and interests.

(iii) Any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (a) as a matter of applicable law or regulation, (b) to exercise, establish, or defend our legal rights, or (c) to protect your vital interests or those of any other person.

(iv) A potential buyer (and its agents and advisors) in the case of a sale, merger, consolidation, liquidation, reorganization, or acquisition. In that event, any acquirer will be subject to our obligations under this privacy policy, including your rights to access and choice. We will notify you of the change either by sending you an email or posting a notice on our Website.

(v) Any other person with your consent.

## **B. Your Choices and Opt-Outs**

Members and Visitors who have opted into our marketing emails can opt out of receiving marketing emails from us at any time by clicking the "unsubscribe" link at the bottom of our marketing messages.

Also, all opt-out requests can be made by emailing us using the contact details provided in the "Questions and Concerns" section below. Please note that some communications (such as service messages, account notifications, billing information) are considered transactional and necessary for account management, and Members cannot opt out of these messages unless you cancel your TSI account.

## **C. Our Security**

We take appropriate and reasonable technical and organizational measures to protect Personal Information from loss, misuse, unauthorized access, disclosure, alteration, and destruction, taking into account the risks involved in the processing and the nature of the Personal Information. If you have any questions about the security of your Personal Information, you may contact us at legal@timkado.id.

TSI accounts require a username and password to log in. Members must keep their username and password secure, and never disclose it to a third party. Because the information in a Member’s TSI account is so sensitive, account passwords are hashed, which means we cannot see a Member’s password. We cannot resend forgotten passwords either. We will only provide Members with instructions on how to reset them.

## **D. Retention of Data**

We retain Personal Information where we have an ongoing legitimate business or legal need to do so. Our retention periods will vary depending on the type of data involved, but, generally, we'll refer to these criteria in order to determine retention period:

* Whether we have a legal or contractual need to retain the data.
* Whether the data is necessary to provide our Services.
* Whether our Members have the ability to access and delete the data within their TSI accounts.
* Whether our Members would reasonably expect that we would retain the data until they remove it or until their TSI accounts are closed or terminated.

When we have no ongoing legitimate business need to process your Personal Information, we will either delete or anonymize it or, if this is not possible (for example, because your Personal Information has been stored in backup archives), then we will securely store your Personal Information and isolate it from any further processing until deletion is possible.

**E. Where We Store Your Personal Information**

The Personal Information that we collect from you may be stored at, transferred to, or processed by third party service providers. We will use all reasonable endeavors to ensure that all such third-party service providers provide a level of protection that is comparable to our commitments under this Privacy Policy.

Your Personal Information may also be stored or processed outside of your country by personnel who work for us in other countries, or by our third-party service providers, suppliers, contractors or Affiliates, to the extent permitted under the applicable law. In such a case, we will ensure that such Personal Information remains subject to a level of protection comparable to what is required under the laws of your country (and, in any event, in line with our commitments in this Privacy Policy).

**F. Security of Your Personal Information**

Confidentiality of your Personal Information is of utmost importance to us. We will use all reasonable efforts to protect and secure your Personal Information against access, collection, use or disclosure by unauthorized persons and against unlawful processing, accidental loss, destruction and damage or similar risks. Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Information, you acknowledge that we cannot guarantee the integrity and accuracy of any Personal Information which you transmit over the Internet, nor guarantee that such Personal Information would not be intercepted, accessed, disclosed, altered or destroyed by unauthorized third parties, due to factors beyond our control. You are responsible for keeping your Account details confidential and you must not share your password with anyone, and you must always maintain the security of the mobile device that you use.

**G. Language**

If there is any inconsistency between the English version of this Privacy Policy and other language versions, the English version shall prevail.

**H. Acknowledgement And Consent**

1. By accepting the Privacy Policy, you acknowledge that you have read and understood this Privacy Policy and you accept all of its terms. In particular, you agree and consent to us collecting, using, disclosing, storing, transferring, or otherwise processing your Personal Information in accordance with this Privacy Policy.
2. In circumstances where you provide us with Personal Information relating to other individuals (such as Personal Information relating to your spouse, family members or friends), you represent and warrant that you have obtained such individual’s consent for, and hereby consent on behalf of such individual to, the collection, use, disclosure and processing of his/her Personal Information by us.
3. You may withdraw your consent to any or all collection, use or disclosure of your Personal Information at any time by giving us reasonable notice in writing using the contact details stated below. You may also withdraw your consent for us to send you certain communications and information via any “opt-out” or “unsubscribe” facility contained in our messages to you. Depending on the circumstances and the nature of the consent which you are withdrawing, you must understand and acknowledge that after such withdrawal of consent, you may no longer be able to use the Application or certain of the Transportation Services. A withdrawal of consent by you may result in the termination of your Account or of your contractual relationship with us, with all accrued rights and obligations remaining fully reserved. Upon receipt of your notice to withdraw consent for any collection, use or disclosure of your Personal Information, we will inform you of the likely consequences of such withdrawal so that you can decide if indeed you wish to withdraw consent.

**I. Anoymised Data**

We may create, use, license or disclose Personal Information, provided, however, (i) that all identifiers have been removed such that the data, alone or in combination with other available data, cannot be attributed to or associated with or cannot identify any person, and (ii) that has been combined with similar data such that the original data forms a part of a larger data set.

**J. Third Party Platforms**

Our Application, Website, and Marketing Material may contain links to websites, plug-ins, and applications that are operated by third parties (“**Third Party Platforms**”). Clicking on these links or enabling any connections to these Third-Party Platforms may allow such third parties to collect and process your Personal Information. We may also occasionally use Third Party Platforms to collect your Personal Information. Before submitting or uploading any Personal Information over these Third-Party Platforms, you should consult the terms and conditions and privacy policies of these Third-Party Platforms to find out how they collect and use your Personal Information. We do not control nor accept liability or responsibility for these Third-Party Platforms and/or the collection, use, maintenance, sharing, or disclosure of data and information by such third parties.

Advertisements contained on our Application, Website, or operate as links to the advertiser’s website and as such any information they collect by virtue of your clicking on that link will be collected and used by the relevant advertiser in accordance with the privacy policy of that advertiser.

Should you choose to connect your email or messaging account (e.g. Whatsapp, LINE, Facebook Messenger) to our platform, you will be using a set of features built using technology from Delapan Belas Pte Ltd. (hereafter known as “Delapan Belas”). By signing up or using the DAISI application, you understand and agree that Delapan Belas will have access to your information and will be permitted to use that information for specific, limited purposes to provide the Services to you, in accordance with our agreement with Delapan Belas.

You have the option of integrating aspects of your messaging metadata with your account through our integration with Delapan Belas. We will ask for your consent to connect your Google account to your DAISI account. This step is optional but can very valuable in helping you to make the best use of our platform by tracking your interactions with your leads and customers.

When you connect your Google account with the DAISI platform through Delapan Belas, we will have access to certain information such as the email meta headers (sender, recipient, and date), the email message body and subject line, or other information such as links are opened (“**Google Data**”).

We only process Google Data you make available to us through this integration in order to provide the Service to you and to improve the Services, consistent with [Google's Limited Use Requirements](https://developers.google.com/terms/api-services-user-data-policy?#additional-requirements-for-specific-api-scopes). We do not independently access the Google Data ourselves unless we first obtain your consent to view the Google Data (e.g., to provide you with tech support), we need to do so for internal security purposes, to comply with applicable law, or where the data is fully aggregated and anonymized for internal use purposes and cannot be used to identify you or your email recipients.

In addition, we will only transfer the Google Data to others if necessary to provide or improve user-facing features that are prominent in the Services, to comply with applicable laws, or as part of a merger, acquisition, or sale of assets. We also do not use Google Data for advertising purposes.

At any time, you can disconnect your Google account and delete this data in your in your account or by reaching out to [legal@timkado.id](mailto:legal@timkado.id) and requesting that it be deleted.

**Information We Collect From Other Sources**

We may also obtain information from other sources and combine that with information we collect through our Services. For example, we may collect information about you from third parties, including but not limited to social media sites, credit bureaus, data enrichment providers and publicly available sources.

K. Changes To This Privacy Policy

We may review and amend this Privacy Policy at our sole discretion from time to time, to ensure that it is consistent with our future developments, and/or changes in legal or regulatory requirements. If we decide to amend this Privacy Policy, we will notify you of any such amendments by means of a general notice published on the Application and/or Website, or otherwise to your Member’s e-mail address set out in your Account. You agree that it is your responsibility to review this Privacy Policy regularly for the latest information on our data processing and data protection practices, and that your continued use of the Application or Website, communications with us, or access to and use of our services following any amendments to this Privacy Policy will constitute your acceptance to the amendments.

## L. Questions & Concerns

If you have any questions or comments, or if you have a concern about the way in which we have handled any privacy matter, please email us at legal@timkado.id