



KOVERNOW PTE LTD – PRIVACY STATEMENT

We at Kovernow Pte. Ltd. (hereinafter “**Kovernow**”, “**us**”, “**we**” or “**our**”) are committed to protecting your personal data in accordance with the Personal Data Protection Act 2012 (“**PDPA**”) of Singapore. This Personal Data Protection Statement (“**Privacy Statement**”) describes how we handle information we obtain when you access and use our services or communicate with us.

This Privacy Statement applies to our website, and our products and services (collectively, the “**Services**”). By submitting any personal data to us and by using our Services, you acknowledge that you have read this Privacy Statement and that you consent to us collecting, using and disclosing your personal data in accordance with the terms of this Privacy Statement. If you do not consent to the terms of this Privacy Statement, please be aware that we might not be able to render all our Services.

We reserve the right to update this Privacy Statement from time to time. Any changes to this Privacy Statement will be posted to this page and will come into effect on the date of posting. You are therefore encouraged to check this page regularly.

What is “**Personal Data**”?

“**Personal Data**” means data, whether true or not, about an individual who can be identified from that data or from that data and other information to which we have access to. Personal data which you may provide to us include the following:

- Full name;
- NRIC, FIN (Foreign Identification Number) or passport number;
- Photograph or video image of an individual;
- Mobile telephone number;
- Personal email address;
- Residential address;
- Payment related information such as bank account details; or
- Information from cookies.

What isn’t **Personal Data**?

Please note that “business contact information” is not covered by the PDPA and this Privacy Statement. “**Business contact information**” refers to an individual’s name, position name or title, company name, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for their personal purposes.

Information we collect

We may obtain information about you in a variety of ways, such as when you voluntarily provide it to us, or when it is automatically sent to us by the device you use to access the Services (e.g. cookies).

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Cookie Data

For us to provide you with our Services, data may be collected by way of “cookies” when you use our website. Cookies help us to improve the functionality of our website. We use cookies for analytics, statistics, and marketing purposes.

Our cookies cannot be used to get data from your hard drive, or other data that can be traced to you personally. By using our Services, you consent to the storage and use of our cookies on your device.

You may adjust your browser or device settings to disable cookies; however, doing so may limit your access to the full features and functions of our Services. Already stored cookies can be deleted at any point of time.

You can use the following deactivation pages to disagree with the use of cookies, which serve to measure the range and advertising purposes.

- optout.networkadvertising.org
- www.aboutads.info/choices
- www.youronlinechoices.com/uk/your-ad-choices/

The cookies we use are:

Cookies	Usage
Google Analytics	Analytics, statistics and marketing
Cloudflare	Security
PHPSESSID	Display
lang	Display
Google AdWords	Marketing
LinkedIn	Marketing
Facebook	Marketing
Google DoubleClick	Marketing
Xing	Marketing

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Our website may contain advertisement and links to third-party websites, applications or services that are beyond our control. We are not responsible for the security or privacy of any information collected by these websites, applications or other services operated by third parties. We encourage you to check the privacy policies, terms of service and usage of all third party sites that you visit prior to downloading or using any such third party applications or websites. To the fullest extent permitted under applicable laws, we shall not be responsible for a third party's acts, omissions, data policies or their use of cookies nor the content or security of any third party websites, even if linked to our website.

SDK (Software Development Kit) Data

Our mobile application code may use SDKs to track conversion data. This data is not specific to you and does not contain personal data. SDKs allow us to establish a relationship between our marketing and its respective impact.

When do we collect your Personal Data?

We will only collect your Personal Data where it is reasonable and appropriate to do so in the circumstances. In general, the ways in which we may collect your Personal Data include (but are not limited to the following):

- When you use and access our Services;
- When you submit forms relating to any of our Services;
- When you contact us with instructions, queries, requests, feedback or complaints;
- When you sign up for alerts, newsletters or other marketing material; or
- When we conduct market research, promotions or surveys.

By submitting your Personal Data to us, you warrant that all Personal Data is complete, accurate, true and correct. Failure to ensure that such data provided to us is complete, accurate, true and correct may result in inability on our part to provide you with our Services. If you provide Personal Data to us on behalf of another person, you warrant that you have obtained consent from that person to provide such Personal Data on their behalf, and you agree to indemnify and hold Kovernow harmless from any breach of such warranty.

For what purposes do we collect, use or disclose your Personal Data?

We may collect, use or disclose your Personal Data when you use our Services for the following purposes:

- To provide you with access to our Services;
- To improve your experience while using our Services including providing customisations, features and advertising;
- To comply with legal and regulatory requirements;
- To respond to your queries, requests, feedback or complaints;
- To communicate with you for marketing, research, survey or promotional purposes;
- To inform or update you of other products or services available from Kovernow and/or its partners/affiliates, where you have consented to be contacted for such purposes;
- To update you on changes to our Services.

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We will only collect and use your Personal Data with your consent or deemed consent or as otherwise permitted under the PDPA or other applicable laws and regulations, and for purposes which you have consented to, or where we believe it is necessary to protect our legal rights. We may also use information about you in connection with legal claims, regulatory issues, audit function, merger, acquisition or funding.

Who do we share your Personal Data with?

We will not disclose and/or transfer your Personal Data without your consent. However, in the course of providing you with our Services, your Personal Data may be disclosed to the following third parties for the purposes listed above (which are non-exhaustive):

- our agents, contractors or service providers who have been engaged by us to provide services such as payment processing, data processing, marketing etc. and their respective service providers, business partners and agents;
- professional advisors engaged by us such as lawyers, auditors, advisors to help us perform our regulatory and corporate duties and/ or statistical analysis;
- financial institutions, government authorities or law enforcement agencies or other entities as required under applicable law;
- any party to whom you authorise us to disclose your Personal Data; and
- any partner/ affiliate/ subsidiary of Kovernow.

We may also subcontract processing to, or share your Personal Data with third parties located in countries other than Singapore. You agree that we may transfer your Personal Data to our affiliates, subsidiaries and/or other third parties located outside of Singapore, as long as the Personal Data is handled in accordance with this Privacy Statement and all applicable laws. We will take all appropriate steps to ensure that any party in a country or territory outside Singapore to whom we transfer Personal Data is bound by legally enforceable obligations, to provide to the transferred Personal Data a standard of protection which is comparable to the protection under the PDPA.

We may disclose and/or transfer your Personal Data to a third party only if:

- the disclosure or transfer is necessary for the provision of the Services, in connection with legal proceedings, advice or rights, or required by any law or regulation to which we are subject;
- if a contract (e.g. a data processing agreement or a similar transfer control mechanism) has been concluded between us and the relevant third party that provides for safeguards at a similar protection as provided by this Privacy Statement or by applicable law (including the PDPA);

All such third parties to whom Personal Data is disclosed and/or transferred are required to:

- maintain the confidentiality of your Personal Data in accordance with applicable laws (including the PDPA) and the relevant contract with us;
- use and process Personal Data only in accordance with our instructions and for purposes authorized by us; and
- take appropriate technical, physical and organisational security measures to protect the Personal Data.

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We may collaborate with our affiliate/ partner/ subsidiary to organise joint marketing and promotional campaigns, which may require us to disclose your information to such third parties. You may be able to enjoy the promotion, offer or participate in the contest, only if you consent to disclosure of your Personal Information to our affiliate/ partner/ subsidiary.

If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of service to another provider, your information may be transferred as part of such a transaction.

How do we manage, protect and store your Personal Data?

We have appointed a Data Protection Officer who will oversee and ensure management of Personal Data in accordance with the PDPA. The contact details of our Data Protection Officer are listed below.

1. Protection

We take breaches of privacy very seriously and will take all reasonable steps and employ appropriate security measures like rendering data anonymous or at least using pseudonyms to ensure that your Personal Data is securely stored and protected against unauthorised and illegal access, collection, use, disclosure, copying, modification, disposal or similar risks.

2. Accuracy and Correction

We endeavour to ensure that your Personal Data collected is accurate and complete if the Personal Data is likely to be used by us to make a decision that affects you or is likely to be disclosed by us to another organisation.

To help us maintain the accuracy of your Personal Data, if there is any change or update in your Personal Data, please update us accordingly. Alternatively, if you wish to correct any of your Personal Data which we have, please write to our Data Protection Officer at the contact details below, and we will correct or update your Personal Data as soon as reasonably practicable.

3. Retention

We will only retain Personal Data for as long as the retention is required for (i) the purposes for which such Personal Data was collected and (ii) for legal and business purposes. Otherwise, we will exercise measures to ensure such Personal Data is disposed of or discarded in a secure manner that would prevent further processing, unauthorized access, or disclosure to any other party or public.

What are your rights?

1. Right to withdraw consent

You may withdraw your consent for the collection, use and disclosure of your Personal Data at any time by giving us reasonable notice. You may withdraw your consent by sending a written request by email or by post to our Data Protection Officer at the address below. Upon receiving your written request, we will inform you of the likely consequences of the withdrawal of your consent, and will cease to collect, use and disclose your Personal Data therefrom, unless otherwise permitted or required by the PDPA or any other applicable laws and regulations.

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Please note that if you withdraw your consent to any or all use or disclosure of your Personal Data, depending on the nature of your request, we may not be able to offer or to provide to you our products or services or administer any contractual relationship in place.

2. Right of access and correction

You may request for information regarding your Personal Data that is in our possession or under our control, as well as information about the ways in which your Personal Data has been or may have been disclosed by us within a year before the date of your request.

Who should you approach?

If you have any feedback or enquiries relating to your Personal Data or if you wish to know more about our data protection policies and practices, please contact us at the following:

Name: Manjiv Dodanwela

Email Address: manjiv.dodanwela@kovernow.com

Contact Number: +65 9383 7132

Postal Address: Kovernow Pte.Ltd., 4 Battery Road, Bank of China Building, #25-01, Singapore 049908

For more information about the PDPA, please visit <http://www.pdpc.gov.sg>.

This Privacy Statement shall be governed in all respects by the laws of Singapore.

This Privacy Statement was last updated on the 22 June 2022.

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