

Privacy Policy

Last updated - 16 July 2018

Introduction

The purpose of this Privacy Policy is to inform you, the user ("You") of **NEW Asurion Singapore Pte Ltd ("Asurion", "us", "our" or "we")** about Asurion's practices relating to the collection, use and disclosure of Personal Information (as defined below) about You that may be acquired or provided through Your access to or use of an Application. This Privacy Policy also explains how You can contact us if You have a question about, want to make a change to or want to remove any Personal Information about You that Asurion may be holding. By using the application, You consent to the collection, use and disclosure of Your Personal Information in accordance with the following terms and conditions. Asurion strongly recommends that You take the time to read this Privacy Policy and retain a copy for future reference.

We value privacy, especially yours

At Asurion, we take protecting your privacy seriously. In order for our products to function properly, we need to collect and use certain Personal Information and Technical Data (collectively Information). We want you to understand what Information we collect and how it is used. This Privacy Policy explains Asurion's privacy practices related to your use of our mobile applications. As used in this Policy, Asurion includes Asurion LLC and its subsidiaries and affiliates.

By downloading and using our application, you acknowledge that you have accepted the EULA and this Policy without exception. You also acknowledge that you consent to our privacy practices, including our use and disclosure of your Personal Information. If you do not consent to the EULA or Policy, please do not download or use the application or provide any Personal Information.

What's covered by this Policy

Any application which links to this Policy, is covered by this Policy.

This Policy does not cover and we are not responsible for third-party websites or applications that may be linked from our application; linking to them does not imply an endorsement. We are not responsible for these websites or applications or any information they may collect. You should always review the privacy policy of any third party website or application.

Information we collect

When you download and use the application, we may collect the below types of Information.

Personal Information:

- Name;
- Mailing address;
- Email address;
- Cell phone number;
- Electronic Serial Number ("ESN") or International Mobile Equipment Identity ("IMEI") data;

- Device serial number and media access control ("MAC") address
- Information collected after obtaining your permission during your use of the application such as geolocation information;
- Copies of information that you choose to backup from your phone;
- Other information that personally identifies you or is linked or linkable to you.

Technical Data:

This Technical Data may include:

- Telephony data, i.e. your network type, network operator name, subscriber identity module ("SIM") operator name, SIM country;
- Carrier name;
- Operating system version;
- Device model;
- Performance and data usage, i.e. data storage amount, Central Processing Unit ("CPU") and memory consumption;
- Other usage logs;
- Battery status and battery usage patterns and power consumptions;
- Lists of other installed applications;
- Listing of types (i.e. Gmail, Yahoo, etc.) of other email accounts configured to your device;
- Device information related to your choice of settings for your device such as Wi-Fi, Global Positioning System ("GPS") settings, and Bluetooth settings;
- Mobile device settings;
- Screen brightness and roaming data;
- Other technical information Asurion may need to provide you with services;
- Aggregated, anonymous non-public Personal Information.

Asurion may leverage external data sources in order to provide context and background on the users of its services in order to improve customer experience, mitigate fraud or malicious activity, or comply with internal company and external regulatory requirements.

How we use your Information

Asurion may use the Information to:

- Fulfill a service to you;
- Complete your purchase;
- Establish and verify your identity;
- Activate and maintain your account;
- Handle and resolve billing disputes;
- Monitor and maintain the performance and functionality of the device consistent with your choices;
- Provide technical support, clickable card, proactive notifications and async - chat functionality;
- Provide you with geolocation based services;
- Protect and improve our services;
- Offer updates, notices and other information about applications and services available from Asurion or its affiliates as permitted by law. (Note: at any time you may choose to withdraw your consent to Asurion's use or disclosure of your Information for marketing and promotional purposes by contacting Asurion

- as outlined in [Where to turn with questions](#) section of this Policy);
- Respond to your questions, inquiries, comments and instructions;
 - To enforce the End User Licence Agreement and/or this Policy;
 - Comply with the law and defend our rights;
 - Track and analyze de-identified data and provide such data to third parties that provide services to Asurion;
 - Protect against fraud and potential fraud;
 - Notify you of any known breach of your Information; and
 - Maintain the security and integrity of the application, and Asurion's systems and services.

In order to provide remote support and screen sharing capabilities, some devices require device administration access. This access will only occur with your permission, and will be disabled when the remote session ends.

How we share your Information

We will not use or disclose your Information to non-affiliated third parties except as disclosed in this Policy.

Asurion may transfer or license your Information to:

- Non-affiliated companies to assist us in providing, maintaining and operating our services or marketing. These companies are required to comply with the principles set out in this Policy and only use such information only for the purposes for which it was provided to them;
- A third-party, in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing of all or any portion of its business or of any assets or shares of our business or a division thereof in order for you to continue to receive the same or similar products and services from the third-party. In such an event, we will provide notice of any material change to this Policy, or our services, in the manner described in this Policy. In these circumstances, Information may be shared with the actual or prospective purchasers or assignees, or with the newly acquired business.

Asurion may also disclose your Information to:

- Comply with the law and/or legal process in which a formal request has been made (e.g. request from an administrative oversight agency, civil suit, subpoena, court order or judicial or administrative proceeding);
- Defend our rights and/or property or the rights and property of others;
- Enforce the End User Licence Agreement or this Policy;
- Respond to claims that the content(s) of a communication violates the rights of another;
- Detect, prevent or otherwise address fraud, security, or technical issues.

How we protect your Information

We use commercially reasonable technical, administrative, and physical controls best practices to protect your Information including data encryption where appropriate; however, since the Internet is not a 100% secure environment, we cannot ensure the security of information during its transmission between you and us. Accordingly, you acknowledge that when you transmit such information, you do so at your own risk. We will notify you of any confirmed security breach of your Information to the extent required by and in accordance with state and federal law.

How long we keep your Information

Asurion will retain your Information as long as necessary to fulfill the purposes outlined in this Policy, unless a longer retention period is required or not prohibited by applicable law.

How you are notified if the Policy changes

We may change this Policy from time to time. If we do, we will post the updated Policy with the last revised date. Your continued use of the application means that you consent to the updates. You should periodically read the Policy to understand our privacy practices.

If we make material changes to this Policy, then we will notify you in the application or by email and seek your affirmative consent.

Communicating with you electronically

By downloading and using our application, you agree that we can communicate with you electronically. This includes any required notifications (i.e. legal, technical, regulatory, security, privacy) relating to your use of the application.

Commercial messages

Where required, Asurion will seek your express consent to send such messages. This consent is sought by NEW Asurion Singapore Pte Ltd, 7 Temasek Boulevard, Suntec Tower One #09-01, Singapore 038987. You may withdraw your consent by using the "unsubscribe" link located at the bottom of our messages, contacting us at the address listed above, or by emailing privacy@asurion.com.

Your rights related to your Personal Information

While we take various steps to ensure the accuracy and completeness of your Personal Information, we rely upon you to provide accurate and complete information when interacting with us.

Upon your request and as allowed or required by law and consistent with our applicable partner agreements, you may request Asurion to take the following actions with your Personal Information: (i) provide you with a copy, (ii) correct, (iii) update, (iv) delete. To make such a request, or if you have a privacy-related complaint, please contact Asurion via postal mail or email as provided in the [Where to turn with questions](#) section of this Policy.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based thirdparty dispute resolution provider at <https://feedback-form.truste.com/watchdog/request>.

A few notes about social media

Please be aware that any information that you submit to a social media site such as Facebook, Instagram or Twitter is done at your own risk and without any expectation of privacy. Asurion cannot control the actions of social media site users and is not responsible for any content or submissions contained on such sites. You should always review the privacy policy of any third party website or application.

By using any functionality that permits submissions to social media sites, you are indicating that you have reviewed the applicable privacy policy and terms of use of that site. Additionally, in the event that we offer functionality through the application that permits the posting of content on social media, please be aware that these sites may allow you to publicly post, and share this content. Asurion cannot guarantee the privacy and safety of these sites and is therefore not responsible for any content you post. Use these features at your own risk.

Children under 13

The services and application are not directed to children under 13. We do not knowingly collect Personal Information from children under 13. If you become aware that your child is accessing the application or the services and providing Personal Information without your consent, please contact us by using the information provided below. We will take steps to remove Personal Information from our storage systems and terminate the account if we determine that a child under 13 has accessed the application or the services.

For non-U.S. residents

We may transfer Information that we collect about you outside of the country in which it was collected. If you are visiting from the European Union or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring Information about yourself, including your Information, to a country and jurisdiction that does not have the same data protection laws as the European Union. By doing so, you are consenting to the transfer of Information about yourself, including your Information, to the U.S. you are also consenting to the use and disclosure of Information about yourself, including your Information, as described in this Policy.

APEC Participation

The Asurion privacy practices, described in this Privacy Policy, comply with the APEC Cross Border Privacy Rules System. The APEC CBPR system provides a framework for organizations to ensure protection of personal information transferred among participating APEC economies. More information about the APEC framework can be found here <http://www.cbprs.org/>.

Accountability and Governance

Asurion has implemented various measures to monitor compliance with and enforce this Policy.

Where to turn with questions

If you have any questions about this Policy, about our application, or want to request access to, correction, or deletion of your Personal Information, or a privacy-related complaint, you can

contact Asurion by email at privacy@asurion.com.

You may also contact us at:

Asurion
Attn: Legal Department
7 Temasek Boulevard,
Suntec Tower One #09-01,
Singapore 038987