

## **VUULR PTE LTD Privacy Policy**

This privacy policy (“Policy”) sets out the basis for processing any personal data we collect from you or that you provide to us. Please read the following carefully to understand our practices regarding your personal data.

By using our website [www.vuulr.com](http://www.vuulr.com) (‘Website’) and the services offered on the Website you are accepting and consenting to the practices described in this Policy.

This Policy may change from time to time, without notice being given to you (unless that is required by law). All future versions of this Policy will be posted on this page. You should check regularly to ensure that you are aware of any changes that have been made. By continuing to use our Website you will be deemed to have accepted such changes.

Depending on the purpose for which you are providing your personal data, for the purpose of the Personal Data Protection Act, 2012 (Singapore) (the “Act”), the data controller (or entity responsible for the data collected) will be Vuulr Pte Ltd, a company registered in Singapore (“Vuulr”, “we” or “us”).

### **Data we may collect from you**

We collect information from you when you register on our site or fill out a form, such as when you subscribe to our email newsletter. You may, however, visit our site anonymously without such data being collected – although cookies may still be placed on your computer in such circumstances.

These provisions apply to information acquired/provided through our Website:

- If you contact us, we may keep a record of that correspondence. If you send us personal information which identifies you via email, we may keep your email and email address. We may also collect information that is available from your browser.
- Details of your visits to the Websites including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
- We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users’ browsing actions and patterns, and does not identify any individual.

### **How we use your data**

Your data will only be used for the purposes indicated when you submit the data or as described below:

- To comply with legal obligations, such as:

- To maintain legal and regulatory compliance
- To ensure network information and security
- To comply with or to enforce our legal obligations under contract or otherwise
- To comply with contractual obligations, such as:
  - to provide the services offered by the Website
  - to provide customer service
  - to communicate
  - to ensure quality control
- To facilitate legitimate business interests, such as:
  - To update and enhance our records
  - To improve our Website
  - For research and development purposes
  - To send weekly newsletters and/or email updates
  - To administer a contest, promotion, survey, research studies and/or market research activity, or any other site feature

### **Disclosure of your data**

The email address you provide to us on the Website will be used to send you our newsletters, in addition to receiving occasional company news, updates, etc.

If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

Except where indicated in this Policy or as agreed by you on a form on the Website, we will not transfer any of your data to any third parties without your permission.

We may disclose your personal information to third parties without obtaining further consent from you in these circumstances:

- Where we outsource any of our business functions under which we collect or store your data. In this case we will ensure that any such service provider adheres to at least the same obligations of security with regard to your data as undertaken by us.
- Where we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect our rights, property, or safety of our employees, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We will never sell, trade, or otherwise transfer to outside parties your personally identifiable information for marketing or promotional purposes.

## Where we store your data

The data that we collect from you may be transferred to, and stored at, a destination outside the European Union. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of orders, the processing of payment details and the provision of support services. By submitting your personal data to us, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## Consent to International Transfers of Personal Data

As a global company, we may store and process your Data in our facilities in various locations. This Policy applies regardless of the location in which we store and process your Data.

We transfer Personal Data to service providers that process data for the specific purposes of performing identity verification and other screening, to enable us to prevent fraud and to comply with our know-your-customer obligations under anti-money laundering and countering the financing of terrorism laws and regulations.

By accepting this Policy, you specifically and voluntarily consent to the transfer of your personal information to any of the countries where we routinely store that data. Some of these countries might not have protections in place for personal data as extensive as those within your country of residence. However, we require our service providers to treat your personal information in strict confidence and to use appropriate security measures to protect it. We also require them to uphold all of our other obligations under this Policy.

## Your rights

You have the right to ask us not to process your personal data for marketing purposes. If you wish to change your mailing preferences or opt-out of specific marketing communications sent from us, you may notify us via our contact us form. It may take up to 21 days for the changes to come into effect. Please note that this will not alter your current email subscription preferences.

You have the following rights in respect of your Data, which you may exercise by notifying us:

- **Access:** The right to request a copy of your Data held by us.
- **Correction:** The right to request that any incomplete or inaccurate Data we hold about you is corrected.
- **Erasure:** You have the right to ask us to delete or remove Personal Data in certain circumstances.

- **Restriction:** You have the right to ask us to suspend the processing of certain of your Personal Data about you in certain circumstances.
- **Data Portability:** You may obtain or request the transfer of certain of your Personal Data to another party in certain circumstances.
- **Objection:** If we are processing your Data on the basis of our legitimate interests for doing so, you have the right to provide specific reasons why you object to such processing.
- **Automated Decisions:** You may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Right to Submit a Complaint:** If you believe that we have infringed your rights, we encourage you to contact us first at [dpo@vuulr.com](mailto:dpo@vuulr.com) so that we can try to resolve the issue or dispute informally. You can also submit a complaint about our processing of your Data to the relevant data protection authority in the country where you live or work or in the place where the alleged breach of the applicable privacy has taken place.

### **Access to information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee (as amended from time to time) to meet our costs in providing you with details of the information we hold about you.

If you would like to request a copy of your personal data under the Act or have any other related queries, please email us at [dpo@vuulr.com](mailto:dpo@vuulr.com).

We will take reasonable steps to create an accurate record of any personal data you have submitted. However, we do not assume responsibility for confirming the ongoing accuracy of your personal data. You can update your personal data by emailing us at [dpo@vuulr.com](mailto:dpo@vuulr.com). Please note that it may take up to 21 days for the changes to come into effect.

### **Cookies**

The Website uses cookies. By using the Website, and agreeing to this Policy, you consent to our use of cookies in accordance with the terms of this Policy.

Cookies are files sent by web servers to web browsers, that are stored by the web browsers. The information is then sent back to the server each time the browser requests a page from the server. This enables a web server to identify and track web browsers. There are two main kinds of cookies: session cookies and persistent cookies. Session cookies are deleted from your computer when you close your browser, whereas persistent cookies remain stored on your computer until deleted, or until they reach their expiry date. Vuulr may use session and/or persistent cookies on the Website

If you wish to disable cookies, you may do so through your individual browser options. More detailed information about cookie management with specific web browsers can be found at the browsers' respective websites.

## **Contact**

Questions, comments, and requests regarding this privacy policy are welcomed. You may contact us at [dpo@vuulr.com](mailto:dpo@vuulr.com).