

## PRIVACY POLICY

We respect your privacy and are committed to protecting your personal data in line with applicable laws and industry standards and practices. This Privacy Policy (“**Policy**”) sets out how we collect, use, store, disclose and protect personal data, that we may collect from you or which you may provide to us through our Platforms.

In accessing and using our Platforms or by providing us with your personal data, you agree and accept the terms of this Policy and consent to our collection, use and disclosure of your personal data in accordance with this Policy. If you do not accept this Policy, please **immediately cease your access and use of our Platforms and do not provide any personal data to us.**

Unless otherwise defined in this Policy, terms used herein will have the same meaning with those defined in the POWERNOW Terms of Use and Service Agreement.

### 1. WHAT PERSONAL DATA IS COLLECTED

**1.1** Your provision of personal data to us is voluntary. If you choose not to provide us with your personal data, it may not be possible for us to provide you with access to our Platforms or the services that you require.

**1.2** “Personal data” is data that can be used to identify a natural person. In the course of your access and use of our Platforms and services, we collect personal data such as:

(l) your name, gender, date of birth, nationality, telephone number, e-mail address, contact address, identification number and other related information;

(m) your financial information (e.g. credit card numbers and bank account information);

(n) personal data of other individuals (e.g. if you use our services to share content with other individuals, or invite them to use our Platforms or services); and

(o) other information that we are required or authorized to collect under any applicable law to authenticate or identify you, or to verify any data that you have provided.

**1.3 Automated collection.** In the course of your access and use of our Platforms and services, certain personal data is automatically collected from you or through the device you use to access our Platforms and services, including:

(a) transactional information based on your activities with us (e.g. services you purchased and content you generated, your device type, identity and other unique identifiers);

(b) device or software information (e.g. configuration information on your mobile devices, web browsers or other applications or platforms used to access our Platforms);

(c) geo-locational information;

(d) IP addresses, browsing information (e.g. search history) and other browsing-related data in connection to your use of our Platforms and services;

(e) information about your access to and usage of other mobile applications and software through our Platforms and services; and

(f) information about your use of your user account to access into other third-party websites, applications or services.

You may disable the automatic collection of certain data. However, certain aspects (or the whole) of our Platforms and services may not be available to you if you choose to do so.

**1.4** We may also collect personal data and information where required or permitted by any applicable law.

**1.5** We may also collect personal data and information from you when you submit an enquiry, feedback or email through our websites or other communication channels.

**1.6** If you provide or allow the collection of personal data of anyone other than yourself, you warrant that you have informed him/her of the purposes for which we require his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes.

## **2. HOW WE USE PERSONAL DATA COLLECTED**

**2.1** We collect and use the personal data received from you for the purposes listed below and any other related or associated purposes.

**2.2 Service-related purposes.** We collect and use your personal data for the purposes of serving you, such as:

(a) providing you with the services that you have requested for;

(b) authenticating, operating and maintaining your user account;

(c) to invite you in creating, developing, operating, providing, improving and promoting our Platform, products, services and content;

(d) to provide you with personalized services based on how you access and use our Platform and services;

(e) to send you important notices and announcements such as services- related information, modification to terms, rules and software upgrading; and

(f) to respond to your feedback.

**2.3 Business purposes.** We may also collect and use your personal data for purposes connected or relevant to our business, such as:

(a) complying with our legal obligations and requirements;

(b) enforcing obligations owed to us, and contractual terms and conditions;

(c) accounting, risk management and record keeping;

(d) carrying out research, planning and statistical analysis;

(e) to prevent, detect, process and investigate fraudulent or other illegal activities, or mitigate the risk of occurrence of the aforementioned events;

(f) staff training; and

(g) any other reasonable purposes related to the aforesaid.

**2.4 Additional purposes.** If you have consented, we may collect and use your personal data for additional purposes such as:

(a) inviting you to promote our Platforms and services on social media platforms;

(b) informing you of our latest activities, special offers and promotions;

(c) informing you of other third-party products and/or services that you may be interested in;

(d) inviting you to participate in polls and questionnaire surveys that may be conducted by us and/or third parties; and

(e) publicizing your feedback about us and/or our services on our marketing materials (including but not limited to newspapers, social media channels, etc.).

**2.5 Contacting you.** When using your personal data to contact you for the above purposes, we may contact you via regular mail, e-mail, SMS, telephone, push notifications (on your devices) or other means. You may determine the type and manner of information that you will receive from us by adjusting your communication preferences on our Platforms or your device.

### **3. DISCLOSURE OF PERSONAL DATA**

**3.1 Disclosure to third parties.** We may disclose your personal data to our related entities, affiliates, partners, contractors and associates for the purposes set out in Clause 2 above.

**3.2 Disclosure to service providers.** We may disclose your personal data with third parties such as:

(a) our service providers and data processors that provide services to us (e.g. accounting, hosting and maintenance services, data analytics services, e-mail message services, delivery services, payment transactions services, marketing, etc.); and

(b) our consultants and professional advisors (e.g. accountants, lawyers, auditors).

**3.3 Disclosure for corporate transactions.** We and our affiliates may be engaged in business asset transactions e.g. mergers, acquisitions and transfer of assets. In such circumstances, we may transfer and/or disclose your personal data to facilitate the completion of the transactions.

**3.4 Other permitted disclosure.** We may disclose your personal data as required or permitted by law, e.g. to regulatory authorities, statutory bodies or public agencies to comply with their requirements, policies and directives.

## **4. TRANSFER OF PERSONAL DATA OUT OF SINGAPORE**

**4.1** You agree and consent to our transfer of your personal data to any location outside of Singapore for the purposes set out above.

**4.2** If we transfer your personal data to a country or territory outside of Singapore, we will ensure that the recipient is obligated to protect your personal data at a standard of protection comparable to the protection under Singapore law, by ensuring that the recipient is either in a jurisdiction with comparable data privacy laws or is legally bound to protect your personal data.

## **5. RETENTION AND PROTECTION OF PERSONAL DATA**

**5.1** We will retain your personal data for so long as we need the personal data for our business and legal purposes. We will dispose of or delete such information if it is no longer necessary for us to retain your personal data.

**5.2** We will take reasonable precautions to safeguard your personal data to prevent the loss, improper use, or unauthorized disclosure of your personal data. However, we cannot be held responsible for any safety or security breach (e.g. hacking) that is beyond our control.

**5.3** When you use our Platforms and services, you may choose to share and upload your personal data to be publicly available to other users. We are not responsible for protecting and may not be able to remove from our Platforms any personal data that you have made publicly available. Please carefully consider any content that you share, upload, release or communicate through our Platforms and services.

## **6. YOUR RIGHTS**

## **6.1 You may:**

(a) access your personal data through your user account;

(b) make corrections to your personal data through your user account;

(c) withdraw consent for our use and disclosure of your personal data by closing your user account;

(d) choose whether to participate in our personalized promotional scheme and other promotional schemes that we may offer from time to time.

**6.2** We may charge you a fee for responding to your requests for access to your personal data or information about the ways in which we have (or may have) used your personal data. If a fee is to be charged, we will inform you of the amount beforehand and will respond to your request once payment is received.

## **7. CHANGES TO POLICY**

**7.1** We may update and amend this Policy from time to time. The updated Policy will take effect immediately when it is published on our Platforms. The updated Policy will supersede earlier versions of our privacy policy and will apply to personal data provided to us previously. If you do not agree with our updated Policy, please immediately cease your access and use of our Platforms and services. You are deemed to have accepted the updated Policy if you continue to access and use our Platforms and services after the updated Policy takes effect.



## **8. CONTACT US**

**8.1** If you have any concerns on how we handle your personal data, wish to make any requests in relation to your personal data, or have any queries in relation to this Policy, please contact our Data Protection Officer at [support@powernow.asia](mailto:support@powernow.asia)