

Privacy Policy

Scope and consent

We want you to understand why and how Triple A Technologies Pte Ltd ("**TripleA**", "we", "us" and/or "our") collects, uses, discloses and or/processes your Personal Data (as defined below) under Singapore's Personal Data Protection Act 2012 (the "**PDPA**").

This Privacy Policy ("**Policy**") applies to you and all Individuals (as defined below) who provide TripleA with Personal Data or whose Personal Data is otherwise collected, used, processed, stored and/or disclosed by TripleA in connection with and/or for the purposes of its operations.

This Policy supplements but does not supersede or replace any previous consent which you may have provided to TripleA, nor does it affect any legal rights that TripleA may have regarding the collection, use, processing and/or disclosure of any Individual's Personal Data.

TripleA may from time to time update this Policy to ensure that it is consistent with our business needs or to accommodate amendments to applicable legal or regulatory requirements. All updates to this Policy will be published online at www.triple-a.io (the "**TripleA Website**").

Notification of any material revisions will also be published on the TripleA Website. You shall be deemed to have accepted the Policy as amended by continuing your relationship with TripleA after any amendments have been published on the TripleA Website.

This Policy forms part of the terms and conditions, if any, governing your specific relationship with TripleA ("**Terms and Conditions**") and it should be read in conjunction with the Terms and Conditions. In the event of any conflict or inconsistency between the provisions of this Policy and the Terms and Conditions, the provisions of the Terms and Conditions shall prevail to the fullest extent permissible by law.

1. **Definitions:** For the purposes of this Policy:

- "**Individual**" (or "**you**") means a natural person, whether living or deceased and "**Individuals**" (and "**your**") shall be construed accordingly;
- "**Personal Data**" means data that is capable of identifying an Individual, whether on its own or in conjunction with other data accessible to TripleA;
- "**Personnel**" means any Individual engaged under a contract of service with TripleA including permanent or temporary employees as well as trainees and interns engaged by TripleA from time to time; and
- "**Potential Personnel**" means any Individual who has submitted an application to be engaged by TripleA as Personnel.

2. **Purposes for collection, use and disclosure of Personal Data**

TripleA will only collect, use and disclose Personal Data from/or related to an Individual that is reasonably considered necessary for the relevant purposes underlying such collection, use or disclosure, which may include but is not limited to the following:

- Provide our Services (including customer support);
- Process transactions and send notices about your transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Communicate with you about our Services and business and to inform you of matters that are important for your account and/or use of the Sites. We also use your personal data to respond to any questions, comments or requests you filed with us and the handling of any complaints;
- Comply with applicable laws and regulations;
- Establish, exercise and defend legal claims;
- Monitor and report compliance issues;
- Customize, measure, and improve our business, the Services, and the content and layout of our website and applications (including developing new products and services; managing our communications; determining the effectiveness of our sales, marketing and advertising; analyzing and enhancing our products, services, websites and apps; ensuring the security of our networks and information systems; performing accounting, auditing, invoicing, reconciliation and collection activities; and improving and maintaining the quality of our customer services);
- Perform data analysis;
- Deliver targeted marketing, service update notices, and promotional offers based on your communication preferences, and measure the effectiveness of it. To approach you via email for marketing purposes, we request your consent, unless it is not required by law. You always have the option to unsubscribe from our mailings, e.g., via the unsubscribe link in our newsletter;
- Perform risk management, including comparing information for accuracy and verify it with third parties and protect against, identify and prevent fraud and other prohibited or illegal activity, claims and other liabilities; and
- Enforce our contractual terms.

3. What Information that we may collect?

The exact Personal Information which we may collect from you will differ depending on if you are visiting a TripleA website/social media account, or if you are onboarded or in the process of being onboarded for the use of our Services. Some of the Personal Data which we may collect through your interaction with us, depending on the mode of interaction, may include your/the:

- First and last name;
- Country and city of residence;
- Location data;
- Job title;
- Nationality of legal representatives and senior management members;
- % shares/voting rights in the company;
- Phone number;

- ID number;
 - Date of birth;
 - Date of birth and nationality of individuals owning or controlling directly and indirectly more than 10% in the company;
 - First and last name and/or billing first and last name and/or shipping name
 - Billing address (street, city, state, country, zipcode) and/or shipping address
 - Email and/or billing email and/or shipping email
 - Phone and/or billing phone number and/or shipping phone number
 - Billing company and/or shipping company
 - Userma
 - User ID
 - Shopping cart items information : for each item, the SKY, price, quantity and name of the item
 - Shopping cart checkout information : shipping cost, tax cost, shipping discount
 - Any online identifier; and
 - Any factors that may be used to identify you.
- This is not an exhaustive list. Depending on how you interact with us, we may collect additional information, as required.

In case Personal Data that you provide to us or we collect is considered special categories of Personal Data or judicial data under applicable data protection laws, we only process them to the extent permitted by applicable law. Special categories of Personal Data may include Personal Data from which we can determine or infer an individual's racial or ethnic origin, political opinions, religious or, trade union membership, genetic data, data concerning health, sexual life or sexual orientation. Judicial data may include data relating to criminal convictions and offences, including information concerning the commission or alleged commission of a criminal offence

Personal Data does not include data where any potential identifiers have been irreversibly removed (anonymous data).

4. How TripleA collects Personal Data

Generally, TripleA may collect Personal Data from you in one or more of the following ways or circumstances:

- Information provided directly: You may be asked to provide Personal Data when you visit or use some parts of our websites and/or services. You do not have to provide us with your Personal Data; however, it could mean that you are not able to access some parts of our website or use our services.
- Information collected automatically: Some information is collected automatically, such as an IP address and device type, when you visit our websites or use our services. This information is useful to us as it provides us with a better understanding of how you are interacting with our websites and services so that we can continue to provide you with the best experience possible.

- Information from third parties: The majority of information that we collect is collected directly from you. Some data may be collected from other sources, such as information that is available in the public domain. We use this information to supplement the Personal Data that we have collected from you.

5. How we use Personal Data and Other Information

We may use personal and other information for our legitimate business interests, to the extent permitted by applicable law, including but not limited to:

- Complete your transactions, respond to your questions, and provide you with customer service;
- Send you transactional and other administrative messages;
- Personalise your experience when you use our services;
- Operate and grow our business (e.g., conduct data analysis; audit our activities; develop new products; enhance, improve and modify our services; identify usage trends; determine the effectiveness of our promotional campaigns);
- Monitor and prevent fraud, money laundering, abuse, and other actual and potential prohibited or illegal activities;
- Meet legal, auditing, regulatory, insurance, security and processing requirements;
- Report to credit bureaus;
- Respond to court orders and legal investigations;
- Deliver marketing communications to you about our services and other companies' services, including offers, coupons or incentives we believe may be of interest to you;
- Comply with applicable laws, which may include laws outside your country of residence;
- Respond to requests from public and government authorities, which may include authorities outside your country of residence;
- Cooperate with law enforcement, or for other legal reasons
- Enforce our terms and conditions; and
- Protect our rights, privacy, safety or property, and/or that of our affiliates, you or others. We may also use information in other ways with your consent or as required by applicable law.

6. How we protect your data

TripleA shall make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to Personal Data in its possession.

If TripleA transfers Personal Data outside of Singapore, TripleA will take reasonable steps to ensure that such Personal Data transferred receives a standard of protection comparable to the protection received under the PDPA and such transfer shall be subject to this Policy.

TripleA will ensure that third parties who receive Personal Data from TripleA protect such Personal Data in a manner consistent with this Policy and not use such Personal Data for any purposes other than those specified by TripleA, by incorporating appropriate contractual terms in its written agreements with third parties.

TripleA is not responsible in any way for the security and/or management of Personal Data shared by you with third party websites accessible via links on TripleA's website.

Please know, however, that no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please contact us immediately.

7. How we share data with third parties

We share and disclose information with:

- Our internal departments, in order to carry out the purposes outlined above, Personal Data you provide shall be disclosed to our compliance team and other internal functions on a need to know basis or where we have a legitimate interest in doing so;
- Our vendors that provide us with services related to information technology, such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, and email delivery;
- Our vendors that provide us with services related to our marketing communications and campaigns, consistent with your choices, including any applicable choices we provide for you to opt into such sharing;
- Your social media connections, other website users and your social media account providers;
- Other third parties in the event of a reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of our business, assets or stock, or in any bankruptcy or similar proceedings; and
- Others as required by law. We reserve the right to disclose any Personal Data you have provided if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property in accordance with applicable laws. We also reserve the right to retain to comply with any specific record retention laws that apply.

8. Request to Withdraw Consent

You have the right to withdraw your consent to the collection, use and/or disclosure of your Personal Data in the possession of TripleA by submitting your request to TripleA's Data Protection Officer at compliance@triple-a.io at any time.

We will process your request for the withdrawal of consent within a reasonable period of time from such a request being made. After that time, we will not

collect, use and/or disclose your Personal Data in the manner stated in your request.

Your withdrawal of consent could affect the services that we are able to provide to you. Depending on the extent of your withdrawal of consent for us to process your Personal Data, it may mean that we are not able to continue with our existing business relationship.

With regards to data that is collected by cookies, you may disable the use of cookies on your internet browser when accessing TripleA's Website. However, disabling the use of cookies may result in the loss of functionality, restrict your use of the website and/or delay or affect the way in which TripleA's website operates.

9. Accuracy of Personal Data

Information voluntarily provided by you to TripleA shall be deemed complete and accurate.

TripleA will take reasonable steps to verify the accuracy of Personal Data received at the point of collection, but you will remain primarily responsible and liable to ensure that all Personal Data submitted by you to TripleA is complete and accurate.

TripleA will also take reasonable steps to periodically verify the Personal Data in its possession, taking into account the scope of its operations. However, you remain responsible for notifying TripleA, from time to time, of any applicable changes to your Personal Data. You may notify support team of any changes to your Personal Data by email at support@triple-a.io, or you may contact the Personal Data Officer by email at compliance@triple-a.io at any time.

TripleA shall not be held liable for any inability on its part to provide services to you if you fail to ensure that your Personal Data submitted to TripleA is complete and accurate.

10. Access to and correction of Personal Data

You may request :

- access to any Personal Data that is currently in our possession or control; and/or
- correction of any data that is currently in our possession or control by contacting us by email at support@triple-a.io.

For your protection, we may need to verify your identity before implementing your request.

When you request access to your Personal Data within our possession or control, we will seek to provide you with the relevant information within 10 business days.

Upon your written request, we will correct any inaccurate Personal Data that is within our possession or control within 10 business days.

With your consent, once we have corrected your Personal Data, we will send the corrected Personal Data to all organisations to which your Personal Data was disclosed by TripleA within a year before the correction was made, unless that organisation does not require the corrected Personal Data for any legal or business purpose.

TripleA is not required, under the PDPA, to provide access and correction to Personal Data in certain exempted situations as set out in the PDPA.

11. Retention of Data

The length of time that we keep your Personal Data depends on what it is and whether we have an ongoing business need to retain it.

We will only retain your data for as long as we have a business relationship with you and for a period of time afterwards where we have an ongoing business need to retain it, or where we are required by law to retain it.

Upon the expiry of time relating to any business needs or legal requirements to retain your Personal Data we will ensure that your Personal Data is deleted or anonymised.

12. Making a complaint

You are welcome to contact us if you have any complaint or grievance about how we are handling any Personal Data in our control or possession.

To make a complaint you can:

- Contact our Data Protection Officer via email at compliance@triple-a.io;
- Visit us in person at our Singapore office during our office hours (9:00am to 6:00pm).