# Privacy Policy

### DATE LAST UPDATED: 01/10/2024

#### Introduction

This Privacy Policy applies to the <u>http://marketnode.com/</u> website (the "Website") operated by Marketnode Pte. Ltd. ("**Marketnode**", "we" or "us") and governs data collection, processing and usage in compliance with the Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore ("**PDPA**"). By using the Website, you consent to the data practices described in this statement. Capitalized terms that are not defined in this Privacy Policy have the meaning given to them in our Terms of Service.

# Information Collected from All Visitors to our Website

We will obtain personal data about you when you visit us. This includes information you provide when you interact with our Website, opt-in to marketing information, sign up for our newsletter or give us feedback or contact us. Such data include, but is not limited to:

#### User Information:

Marketnode collects identifying information from users of the Website including names, addresses, work phone numbers, work email addresses, IP address, browser type, etc. This information is used for improving the Website, validation of identity, managing processes, reporting, diagnosing technical problems, other operations related to making the Website accessible to Marketnode's customers, business partners and visitors. Marketnode only uses your personal data for purposes of providing the Website, responding to support questions, providing activity monitoring to customers, and other matters related to the Website and the offering of the Services.

The legal basis on which we process personal data is our legitimate interest to deliver and manage our Website, validate user identity, and manage transactions. This data is retained indefinitely and is only deleted upon request.

#### Analytics data:

We may also track and analyze non-identifying and aggregate usage and volume statistical information from site traffic, and we may provide such information to third parties that assist us for these purposes. We may collect analytics data, or use third-party analytics tools and services, to measure traffic and usage of the Website. These tools collect information sent by the browser or mobile device, including the pages visited and other information that assists us in administering and improving the Website.

When you visit us, we may monitor the use of this Website through the use of cookies and similar tracking devices. For example, we may monitor the number of times you visit our Website or which pages you go to. This information helps us to build a profile of our users. Some of this data will be aggregated or statistical, which means that we will not be able to identify you individually.

For the purposes of this Privacy Policy, personal data includes but is not limited to any information identifying a living, identified or identifiable individual user of our Website about whom we hold personal data or information relating to such person that we can identify (directly or indirectly) from the data alone or in combination with other identifiers we possess or can reasonably access. Personal data excludes anonymous and/or public data and data that has had the identity of an individual permanently removed.

This Privacy Policy applies to all visitors to our Website. By submitting personal data to our Website, you consent to the processing of your personal data. The consent may be withdrawn by written notice to us at support@marketnode.com. We may check the details you provide with fraud prevention agencies and share your information with them if we suspect fraud. It is important that you do not provide false, inaccurate information or impersonate another individual.

# **Personal Data Protection Principles**

Marketnode uses commercially reasonable and appropriate security measures to protect against unauthorized access, alteration, disclosure, or destruction of personal data. We adhere to the following principles relating to the processing of personal data which require personal data to be:

- (a) processed lawfully, fairly and in a transparent manner;
- (b) collected only for specified, explicit and legitimate purposes;
- (c) relevant and limited to what is necessary in relation to the purposes for which it is processed;
- (d) accurate;
- (e) not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed; and
- (f) processed in a manner that ensures its security using appropriate technical and organizational measures to protect against unauthorized or unlawful processing and against accidental loss, destruction or damage.

While we strive to protect your data, we cannot guarantee that unauthorized access, hacking, data loss or a data breach will never occur, and we cannot warrant the security of any information that you provide to us. You are responsible for securing and maintaining the privacy of any password(s) and account registration information used with us.

# Your Rights and Requests

You have rights when it comes to how we handle your personal data. These include rights to:

- (a) withdraw consent to the use and collection of your personal data at any time;
- (b) request access to your personal data that we hold;
- (c) request that your personal data that we hold is rectified or updated;
- (d) prevent our use of your personal data for direct marketing purposes;
- (e) ask us to erase your personal data if it is no longer necessary in relation to the purposes for which it was collected or processed or to rectify inaccurate data or incomplete data; and
- (f) request that processing of your personal data is restricted in limited circumstances in accordance with applicable law.

# Use of Personal Data

Marketnode uses the collected information:

- (a) to operate the Website and offer the Services;
- (b) to process, and where necessary, respond to your application, enquiry or request;
- (c) to gather customer feedback;
- (d) to inform or update you of other products or Services available from Marketnode and its affiliates, where you have consented to be contacted for such purposes;

- (e) to monitor, improve and administer the Website and Services, and to provide general statistics regarding user of the Website;
- (f) to update you on changes to the Website and Services.

# **Third Party Processors**

Marketnode may share information, including personal data, with its third-party service providers used to provide hosting for and maintenance of our Website, application development, backup, storage, payment processing, analytics and other services for us. These third-party service providers may have access to or process your personal data for the purpose of providing these services for us; however, we do not permit our third-party service providers to use any personal data that we share with them for their marketing or promotional purposes or for any other purpose than as necessary to provide services to us.

# Non-disclosure

Marketnode does not sell, rent, lease, or release your personal data to third parties. Marketnode may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personal data is not transferred to the third party without your explicit consent. In addition, Marketnode may share data with trusted partners to help us perform statistical analysis, send you email or provide customer support. All such third parties are prohibited from using your personal data except to provide these services to Marketnode, and they are required to maintain the confidentiality of your personal data.

### **Disclosure of Personal Data**

Generally, Marketnode will not share your personal data with third parties unless certain safeguards and contractual arrangements have been put in place.

Marketnode will disclose or share your personal data, without notice, if required to do so by law or in the good faith belief that any such action is necessary to: (a) comply with any legal requirements or comply with legal process served on Marketnode or the Website; (b) meet a third party's legitimate need to know the information and where such third party has agreed to comply with the required data security standards, policies and procedures and put adequate security measures in place, (c) protect and defend the rights or property of Marketnode; and (d) act under exigent circumstances to protect the personal safety of users of the Website, or the general public.

We may also disclose your personal data to third parties: (a) in the event that 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; and (b) if the Website or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

# **Use Of Cookies**

The Website uses "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard drive by a web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you.

Cookies on the Website may be used to ensure a smooth user experience, perform analytics, and for showing relevant advertisements. Please note that third parties (such as analytics software) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies. The Website uses Google Analytics. Please refer to http://www.google.com/policies/privacy/partners to find out more about how Google uses data when you use our Website and how to control the information sent to Google.

Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to access all or

parts of our Website.

# Security Of Your Personal Data

We strive to maintain the safety of your personal data. Any payment transactions will be encrypted using SSL technology. Unfortunately, no internet-based service is completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

# Access to, Updating, and Non-Use of Your Personal Data

Subject to the exceptions referred to in section 21(2) of PDPA, you have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal data, please send an email to support@marketnode.com. We may make a small charge for this service.

We want to ensure that your personal data is accurate and up to date. If any of the information that you have provided to Marketnode changes, for example if you change your email address, name or contact number, please let us know the correct details by sending an email to support@marketnode.com. You may ask us, or we may ask you, to correct information you or we think is inaccurate, and you may also ask us to remove information which is inaccurate.

You have the right to ask us not to collect, use, process, or disclose your personal data in any of the manner described herein. We will usually inform you (before collecting your personal data) if we intend to use your personal data for such purposes or if we intend to disclose your personal data to any third party for such purposes. You can give us notice of your intention to halt the collection, use, processing, or disclosure of your personal data at any time by contacting us at support@marketnode.com.

# Links to Other Websites

Our Website may contain links to other websites. This Privacy Policy only applies to this Website so when you link to other websites you should read their own privacy policies.

# **Changes To This Statement**

This Privacy Policy may be updated from time to time. Following each update, the date of the last revision will be reflected at the top of the page. This page may be bookmarked to facilitate periodic review of this Privacy Policy and to note recent updates. Marketnode encourages you to periodically review this Privacy Policy to be informed of how Marketnode is protecting your information. Neither this Privacy Policy nor any update to it will affect or modify any contract between Marketnode and any [Platform User].

IF YOU DO NOT ACCEPT AND AGREE TO THIS PRIVACY POLICY, INCLUDING ANY CHANGES THERETO, THEN YOU MUST NOT PROCEED FURTHER IN OUR WEBSITE OR USE THE SITE OR ANY OF OUR SERVICES.

# **Contact Information**

If you have any questions in relation to this Privacy Policy, please contact us at support@marketnode.com.