

PRIVACY POLICY

1 Introduction

- 1.1 **HOOLAH HOLDINGS PTE. LTD (“Hoolah Holdings”)** takes the privacy of your information very seriously. We are committed to protecting your personal information in accordance with the Personal Data Protection Act 2012 (“**PDPA 2012**”).
- 1.2 This Privacy Policy explains how we use, disclose, and protect the personal information collected about you via **www.hoolah.co** (referred to below as the “**Company Site**”) and/or other sources of collection from services provided by Hoolah Holdings and/or services provided by other companies (collectively “**Company Services**”) associated with Hoolah (“**Hoolah Group**”). Please read this privacy policy carefully. By using the Company Site and/or any services we offer via the Company Services, you are agreeing to be bound by this policy in respect of the information collected about you via this Company Site and/or Company Services.
- 1.3 In this Policy, when we use "we", "us" or "our", we refer to Hoolah and/or any of the companies within the Hoolah Group which is collecting your personal data, or which is operating the website which you are accessing or using
- 1.4 If you do not agree, please cease use of the Company Site and/or any other relevant website(s) and/or Company Services and/or any other service(s) and **DO NOT provide any personal data to us.**
- 1.5 If you have any queries about the policy, please get in touch with us using the contact details set out below and we will do our best to answer your questions.

2 Information collected

- 2.1 We will collect the following information from you:
 - 2.1.1 personal Information such as name, date of birth or other personal identification information;
 - 2.1.2 personal information such as email address, billing address, postal address and telephone number;
 - 2.1.3 payment information such as credit and debit card data (card number, validity date, and CVV code), invoice information, bank account number, etc;
 - 2.1.4 information on goods/services such as details about the goods/services that you purchase;
 - 2.1.5 financial information on income, potential credit commitments, negative payment remarks;
 - 2.1.6 historical information on your purchase, payment and credit acceptance history;
 - 2.1.7 information on the Company Site on the usage, page response times, download errors, entry and exit methods and delivery notices;
 - 2.1.8 device information such as IP address, language settings, browser settings, time zone settings, operating system and platform and screen resolution; and
 - 2.1.9 geographical information.

- 2.2 Although it is not compulsory to give us this information, if you do not then we may not be able to provide you with the full range of services the Company Services has to offer.

3 Protection of Minors

- 3.1 If you are under the age of 18 years, you are not eligible to use our Company Services or purchase any products online.
- 3.2 Hoolah does not solicit any personal information from minors, and we request that minors do not submit any personal information to us. If you are under the age of 18 years, you may only surf or use the Company Services if you have obtained consent from your parents/legal guardian or if you are under the supervision of your parent or legal guardian.

4 Use of this information

- 4.1 We will use this information in order to:
- 4.1.1 verify and confirm your identity, personal and contact details;
 - 4.1.2 administer your accounts with us;
 - 4.1.3 process orders or applications submitted by you;
 - 4.1.4 assess payment options to offer you;
 - 4.1.5 prevent misuse of Company Services;
 - 4.1.6 monitor content integrity;
 - 4.1.7 track fraudulent and/or other inappropriate contents or behaviour;
 - 4.1.8 carry out risk analysis and risk management;
 - 4.1.9 carry out customer and marketing analysis;
 - 4.1.10 make general improvements to our Company Services;
 - 4.1.11 comply with applicable laws;
 - 4.1.12 obtain your views or comments on the services we provide;
 - 4.1.13 send you information about our products and services; and
 - 4.1.14 Send you information we think you might find useful or which you have requested from us, including information about our products and services or those of carefully selected third parties provided you have indicated that you are happy to be contacted for these purposes.
- 4.2 You can ask us not to contact you with information regarding our products and services or those of third parties or share your information with third parties either at the point such information is collected on the Company Services (by checking or unchecking the relevant box as directed) or, if you do not wish us to continue to use your information in this way, by following the unsubscribe instructions on any communications sent to you. You can also exercise this right at any time by contacting us using the contact details at the end of this privacy policy.

5 Sharing this information

- 5.1 We may transfer or share your information with selected third parties.

- 5.2 We may share with the merchant at which you made your purchase the personal data necessary for the merchant's performance and administration of your order, including and not limited to disputes. The personal data shared with the merchant will be subject to merchant's privacy policies and practices.
- 5.3 We may share your personal data may be shared with credit reference agencies and providers of identity lookups for the purposes of assessing your credit score upon applying for one of Company's Services' payment methods, and for confirming your identity and address information. Payment behaviour may be reported back to the credit reference agency. Depending on the market, a limited lookup may also be conducted before you apply for one of Company's Services' payment methods for purposes of tailoring the payment methods offered to you.
- 5.4 Certain services available by the Company Services are offered in conjunction with one of our collaborators ("Collaborators").
- 5.5 The services include and are not limited to financial services, technology and consultancy services.
- 5.6 In order for those services to be provided we provide some necessary details about you to the Collaborators. We tell you about this at the point we collect that information on the Company Services. Please note that certain services may be unavailable if you do not want to disclose the personal information you are asked for.
- 5.7 We may disclose aggregate statistics about visitors and/or clients of the Company Services, customers and sales in order to describe our services to prospective partners, advertisers or sponsors and other reputable third parties for lawful purposes, but these statistics will contain no personally identifiable information.
- 5.8 We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation, but we will take steps with the aim of ensuring that your privacy rights continue to be protected.
- 5.9 In addition, we may pass your information onto one of our carefully selected Collaborators or to other carefully selected third parties to enable them to send you information which may be of interest to you but only if you have given us permission to do so. You can tell us to stop this at any time by sending an email to privacyconcerns@hoolah.co.
- 5.10 Other than as set out above, we will not disclose any of your personal information without your permission unless we are required by law to do so (for example, if required to do so by a court order or for the purposes of prevention of fraud or other crime).

6 Information automatically collected from your computer

- 6.1 *Log files/IP addresses:* When you visit and/or use the Company Site, our web server automatically records your IP address. This IP address is not linked to any of your personal information. We use IP addresses to help us administer the Company Site and to collect demographic information for aggregation purposes.
- 6.2 We may also gather other information (from which we cannot identify you) such as the type of your internet browser which we use to provide you with a more effective service.

7 Cookies

7.1 When you visit and/or use the Company Site we may store some information (commonly known as a “cookie”) on your computer. Cookies are small files of information which use a unique identification tag and are stored on your device as a result of using the Company Site or other services we provide to you. A number of cookies we use last only for the duration of your session and expire when you close your browser. Other cookies are used to remember you when you return to the site and will last for longer. A cookie helps you get the best out of the Company Services and helps us to provide you with a more customised service. We use cookies for the following reasons:

7.1.1 Necessary session management

- managing your login session. This means, for example, that you can move easily from one page to another within the Company Site and your page requests are loaded in a smooth and secure manner without having to re-enter your details on each page;

7.1.2 Performance

- collecting statistical information about how you use the Company Site so that we can improve the Company Site;
- remembering that you have used the Company Site before; this means we can identify the number of unique visitors we receive to different parts of the Company Site;

7.1.3 Functionality

- storing your preferences and selections;
- customising elements of the layout and/or content of the pages of the Company Site for you;

7.1.4 Internet-based advertising

- enabling our advertising partners and/or Collaborators to gather information about the pages that you visit on the Company Site and other websites you visit, so as to place you in an “interest category”. This information is used to serve advertisements on the Company Site which it is believed will be relevant to your interests.

7.2 Many browsers will automatically accept cookies but you can amend your browser settings to prevent that or to notify you each time a cookie is set.

8 Information about other products and services

8.1 From time to time we may send you information about our other services and products that we think may be of interest to you. You can tell us to stop this at any time by sending an email to privacyconcerns@hoolah.co.

8.2 Also, as mentioned above, we may pass your information onto one of our Collaborators or to other selected third parties to enable them to send you information which may be of interest to you but only if you have given us permission to do so. You can tell us to stop this at any time by sending an email to privacyconcerns@hoolah.co.

9 Changes to your details

We aim to keep our information about you as accurate as possible. If you would like to review or change the details you have supplied us with, you may do so at any time by contacting us as set out below.

10 Access to information by individuals

10.1 You can access most of the information we hold about you by contacting us formally through the contact details indicated below. We will require a formal written request from you to our Data Privacy Officer (details below).

10.2 We may charge an access fee to cover the reasonable cost of retrieving the information and supplying it to you.

10.3 Access to information may be refused in a number of circumstances, such as where the information relates to anticipated legal proceedings or the request for access is frivolous or vexatious. If we deny or restrict your access, we will explain why as required by applicable laws.

11 Retention of information

We will retain information for as long as it is necessary to fulfil the purposes for which it was collected, the legal or business purposes of **Hoolah**, or until you request for us to delete the information, or as required by relevant laws.

12 Use of Reviews or forums

The Company Services may from time to time include reviews, forums, message boards, and/ or news groups on which you can post information. Any information that you post in these areas becomes public information and you should always be careful when deciding to disclose your personal details as part of that information.

13 Security

13.1 We respect the confidentiality of your information and will make reasonable security arrangements to ensure that all information in our possession or control is kept in a safe and secure manner, and to prevent unauthorized access and use of your information.

13.2 If, however, you do not take reasonable care to ensure the continued confidentiality and accuracy of your information, we will not be liable for any consequential misuse and/or fraud.

14 Linking to third-party websites

14.1 We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our Company Site and recommend that you check the policy of each site you visit and contact its owner or operator if you have any concerns or questions.

14.2 In addition, if you linked to the Company Site from a third-party site, we cannot be responsible for the privacy policies and practices of the owners or operators of that third-party site and recommend that you check the policy of that third party site and contact its owner or operator if you have any concerns or questions.

15 Transferring your information outside of Singapore

- 15.1 As part of the services offered to you through the Company Services, the information you provide to us may be transferred to countries outside of Singapore. By way of example, this may happen if any of our servers are located in a country outside of the Singapore or one of our service providers is located in a country outside of the Singapore. We may also share information between our group companies, which may be located in countries worldwide. These countries may not have similar data protection laws to the Singapore. If we transfer your information outside of the Singapore in this way, we will take steps with the aim of ensuring that your privacy rights continue to be protected as outlined in this Privacy Policy.
- 15.2 If you use our services while you are outside Singapore, your information may be transferred outside the Singapore in order to provide you with those services.

16 Resolving Concerns

- 16.1 If you believe that the privacy of your information has been compromised, please contact us and we will take the relevant steps to address your concerns.

17 Updates to Privacy Policy

- 17.1 We reserve the right to change any of the terms and conditions contained in this Privacy Policy in the Company Services, at any time and in our sole and absolute discretion. Any changes will be effective upon posting of the revision on the Company Site. All notice of changes to the Privacy Policy will be posted on the Company Site and may be posted without any notice to you. You are responsible for reviewing the notice and any applicable changes. You will be subject to the new Privacy Policy in force at the time that you use the Company Services.

18 Contact us

If at any time you would like to contact us with your views about our privacy practices, or with any enquiry relating to your personal information, you can do so by sending an email to our Data Privacy Officer at privacyconcerns@Hoolah.co or write to our Data Privacy Officer at 1 Raffles Place #44-02 One Raffles Place Singapore 048616.

19 Governing Law

This Policy is governed by the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this Privacy Policy