

## **PRIVACY POLICY**

### **1. INTRODUCTION**

- 1.1. Privacy Policy - This privacy policy ("**Policy**") sets out the basis on which **YUUKI TECHNOLOGIES PTE. LTD.**, its related corporation and affiliates (collectively "**Yuuki**", "we", "us" or "our") may collect, use, disclose or otherwise process personal data relating to you when you visit our website or use our services in compliance with the Personal Data Protection Act 2012 of Singapore ("**PDPA**"). This Policy applies to personal data in the possession or under the control of Yuuki, including any other legal entities or service providers that Yuuki may engage to collect, use, disclose or process personal data for the purposes of Yuuki in delivering its services to you.
- 1.2. Acknowledgement and Consent - By interacting with us, visiting our Website or accessing the services we provides, you acknowledge and agree that you accept the practices, requirements, and/or policies outlined in this Policy, and you hereby consent to us collecting, using, disclosing and/or processing your personal data as described herein.
- 1.3. Amendments - We may revise or update this Policy at any time by posting a revised version on our website. You are advised to periodically view our website for any updates or the most current version of our Policy. Your continued visit our website or accessing of the Services indicates your agreement with the revised or updated Policy.
- 1.4. Withdrawal - You may withdraw your consent at any time by contacting [care@yuukiai.com] and terminating your use of our services.

### **2. PERSONAL DATA WE COLLECT**

- 2.1. Collection of Personal Data - In using our Services or accessing our website, you may be asked, may have supplied any information to establish your identity, name, background (including your images), gender, date of birth, residential status, nationality, addresses, contact numbers, email addresses, IP addresses, operating systems, browser types, identification numbers, audio recordings, data generated when you apply for or interact with any of our products and/or services such as advertising and marketing data, analytics data and product personalization ("**Personal Data**"). You have the choice, at any time, not to provide your Personal Data to us, however, failure to provide your Personal Data to us may result in Yuuki being unable to provide you with its products and services.
- 2.2. Provision of Personal Data of Other Individuals - To the extent that you have provided, or will provide, Personal Data about your family members, spouse, other dependents (if you are an individual), directors, shareholders, employees, representatives, agents (if you are a corporate, an entity or an organisation) and/or other individuals, you confirm that you have explained or will explain to them that their Personal Data will be provided to, and processed by, us and you represent and warrant that you have obtained their consent to the processing (including disclosure and transfer) of their Personal Data in accordance with this Policy.

### **3. USE OF PERSONAL DATA**

- 3.1. Purpose - We may use Personal Data held for legitimate purposes associated with Yuuki's business, including but not limited to any or all of the following purposes ("**Purposes**"):
  - 3.1.1. To provide you with our services and to attempt to establish or strengthen a business relationship with you;
  - 3.1.2. To enforce the terms and conditions of any agreement between you and Yuuki (including this Policy);
  - 3.1.3. To keep you informed about our services including its updates, via email, messaging, phone, social media or any other channel. This includes information such as promotional material, events, benefits or newsletters that may be of interest to you;

- 3.1.4. To utilise the same for strategic alliances, cross selling, marketing, and promotions;
  - 3.1.5. To respond to your request or questions or to provide information when you contact us or make a request to us;
  - 3.1.6. to enable Yuuki to improve its services and/or products and marketing and customer relationships;
  - 3.1.7. To allow you to participate in interactive features of the website, when you choose to do so;
  - 3.1.8. To utilise and disclose the same for market research and statistical analysis and surveys with the aim of improving our products and services and product development;
  - 3.1.9. To comply with any legal obligation and where required under any applicable laws;
  - 3.1.10. To provide you with the information on our and third-party products and services which may be of interest to you;
  - 3.1.11. To compare information/data for accuracy of our record, and to verify the same with third parties;
  - 3.1.12. To utilise the same for research, design and improvement of our products and services, operational and business processes;
  - 3.1.13. To utilise the same for our outsourcing of business and backroom operations;
  - 3.1.14. To investigate or respond to incidents and complaints and/or to comply with investigations carried out by the police, government or regulators; and/or
  - 3.1.15. For such purposes to which you have given your consent on.
- 3.2. Non-Exhaustive List - You acknowledge, agree and consent to the processing of your Personal Data depending on the circumstances at hand for such purpose that may not appear as a Purpose. However, we will notify you of any such other Purpose at the time of obtaining your consent, unless processing of the applicable data without your consent is permitted by the applicable laws.
- 3.3. Third-Party Use - We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by email, post or telephone.

#### **4. DISCLOSURE AND TRANSFER OF DATA**

- 4.1. Instances of Disclosure - Your Personal Data held by us shall be kept confidential at all times. However, in order to provide you with effective and continuous products and services subject to any laws, regulations and guidelines and for the Purpose, we may need to disclose your Personal Data to the following parties:
- 4.1.1. Yuuki's agents, holding companies, subsidiaries, affiliates, associates and "related corporation" as defined under the Companies Act (Cap. 50) of Singapore;
  - 4.1.2. any governmental agency or regulatory authority of any jurisdiction properly exercising its powers;
  - 4.1.3. professional advisers, contractors, service providers, coaches, debt collection agencies and our other agents with whom we have contractual agreements for some of our functions and services;
  - 4.1.4. parties providing services and/or products to Yuuki (including the coaches, including information technology services, know-your-client and anti-money laundering compliance services providers);
  - 4.1.5. strategic/business partners with whom we have or may have a relationship with for specific products and services;
  - 4.1.6. to any third party where we consider that disclosure of your data to such third parties will be necessary to fulfil legitimate business interests;
  - 4.1.7. entities that Yuuki is in discussions with for a merger or an acquisition of Yuuki by such other entities;
  - 4.1.8. entities that acquire the assets of Yuuki pursuant to any applicable law, including the laws of insolvency in Singapore;

- 4.1.9. entities pursuant to any order of court from a court of competent jurisdiction;
- 4.1.10. any person connected to the enforcement or preservation of any of our rights under your agreements with us; and/or
- 4.1.11. any party authorised and/or consented by you.

**4.2.** Data Protection in Countries Not Including Singapore - The Personal Data that we collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or one of our suppliers. Such staff may be engaged in, among others, the fulfilment of the services to be delivered to you, the processing of your 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 personal data is treated securely and in accordance with PDPA.

**4.3.** Transmission of Information via Internet - Please note that the transmission of information via the internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Platforms and any transmission is made at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access to your personal data.

## **5. YOUR RIGHTS**

**5.1.** Request for Access - To the extent that the prevailing personal data protection and privacy laws allow, you have the right to request for access to, request for a copy of, request to update or correct, your personal data held by us. Please note that depending on the request that is being made, Yuuki may only need to provide you with access to the Personal Data contained in the documents requested, and not to the entire documents themselves, in which case it may be appropriate for Yuuki to instead provide you with a confirmation of the Personal Data that our organisation has on record if the record of the Personal Data forms a negligible part of the document.

**5.2.** Changes to Personal Data - If there are any changes to your Personal Data or if you believe that the Personal Data we hold about you is inaccurate, incomplete, misleading or not up-to-date, kindly write in to us or email your request to [care@yuukiai.com] setting out your name and NRIC/Passport number/Company number, the details of your request, together with the supporting documents. A fee may be charged for this service. We shall correct or update the information/data as soon as possible. For the avoidance of doubt, we may request information or documents from you to verify your identity and the authenticity of the request made and any other information relating to the corrections requested.

**5.3.** Withdrawal of Consent - You have the right, by notice in writing, to inform us of your withdrawal (in full or in part) of your consent previously given to use your personal data, subject to any applicable legal restrictions, contractual conditions and a reasonable duration of time for the withdrawal of consent to be effected. However, depending on the extent of your withdrawal of consent for us to process your personal data, you may not be able to access our services and/or use our website.

**5.4.** Links To Other Platforms - Our website and platform for services may, from time to time, contain links to and from the website or platform of our partner networks, advertisers and affiliates. If you follow a link to any of these platforms, please note that these platforms have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Data to these platforms.

## **6. DATA SECURITY**

**6.1.** Data Security - We will take reasonable steps to keep your personal information safe from loss,

unauthorised activity or other misuse. To safeguard personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, Yuuki has introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption and the use of privacy filters to secure all storage and transmission of personal data by Yuuki, and disclosing Personal Data both internally and to our authorised third party service providers and agents only on a need-to-know basis. Where we have given you credentials which enable you to access certain parts of our services, it is your responsibility to ensure that the credentials are kept confidential and that you do not share the credentials with any third party.

## **7. COOKIES**

- 7.1. Implementation of Cookies - Cookies are small files which are placed on your computer when a website is accessed by you. Cookies help the website user to navigate efficiently between pages and the website operator to track usage of the site. We may link cookie information to personal data. We may from time to time implement "cookies" or other features to allow us or third parties to collect or share information that will help us improve our website and services we offer or help us offer new services and features. Cookies allow us to recognise your computer or device and tell us how and when the services or websites are used or visited, by how many people and to track activity. Cookies are also used to deliver content specific to your interest and to monitor usage of our website and services.
- 7.2. Options in Relation to the Use of Cookies - By using our website and services, you agree to the use of cookies and other technologies as set out in this Policy. If you do not agree to such use please either refrain from using the Platforms, or refuse the use of cookies by selecting the appropriate settings on your browser. However, you may not be able to access the full functionality of our website and services if you choose to do so.