

1. GENERAL

Your privacy is important to us. This Personal Data Protection Policy (“**Policy**”) describes how EyRIS Pte. Ltd. and its Affiliates (“**EyRIS**”, “**we**” or “**us**”) collects, uses, stores, discloses or processes your Personal Data through the use of the EyRIS Website (the “**Website**”). Please take a moment to read this Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data. Your use of and access to the Website are subject to this Personal Data Protection Policy.

2. DEFINITIONS AND RELATED MATTERS

In this Personal Data Protection Policy, “**Personal Data**” refers to any data or information which can be used to identify you or from which you are identifiable. Depending on the nature of your interaction with the Us, this includes but is not limited to:

- (i) your name, telephone number, email address and any other information relating to you which you have provided us via verbal or written communication;
- (ii) information about your usage of and interaction with our Website and/or services including cookies, IP address, computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our website.

3. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

3.1 We generally do not collect your Personal Data unless:

- (i) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your Personal Data to us after:
 - a) you (or your authorised representative) have been notified of the purposes for which the data is collected
 - b) you (or your authorised representative) have provided consent to the collection and usage of your Personal Data for these purposes
- (ii) collection and use of your Personal Data without consent is permitted or required by the Personal Data Protection Act 2012 (“**PDPA**”) or other laws.

3.2 If you provide Personal Data of a third party to us (e.g., next-of-kin information), you confirm that you are duly authorised by that third party to do so for the purposes for which you have provided that Personal Data to us.

3.3 When you browse our Website, you generally do so anonymously but please see the section below on cookies.

3.4 When collecting Personal Data, we may collect it in various ways, including:

- (i) through the submission of Personal Data via the Website;
- (ii) through our staff or other representatives;
- (iii) through emails or other file sharing means that you use to provide the Personal Data to us; and
- (iv) through other users or third parties.

3.5 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with services you have requested, either to the same standard as if you had provided the Personal Data or at all.

4. PURPOSES FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

4.1 Generally, EyRIS collects, uses and discloses your Personal Data for the following purposes:

- (i) responding to your feedback, enquiries, requests, and complaints;
- (ii) enforcing our Terms of Use;
- (iii) further developing the Website;
- (iv) carrying out statistical analysis for the purpose of improving the services provided to you;
- (v) matching any Personal data held which relates to you for any of the purposes listed herein;
- (vi) complying with any applicable rules, laws and regulations, codes of practice or guideline or assisting in law enforcement and investigations by relevant authorities;
- (vii) fulfilling any other purpose for which you provide us Personal Data;
- (viii) fulfilling any other purpose that we may notify you of from time to time.

4.2 EyRIS will take reasonable steps to protect your Personal Data against unauthorized disclosure. Your Personal Data may be disclosed, for the purposes listed above where applicable, to third parties who may be overseas or in Singapore, including:

- (i) our subsidiaries, related companies, Affiliates, or partners;
- (ii) contractors, service providers and other third parties we use to support our business;
- (iii) professional advisors such as lawyers;
- (iv) relevant government regulators, authorities, law enforcement agencies, and/ or such other persons as directed by applicable laws, rules or regulations; and
- (v) any other party to whom you authorize us to disclose your Personal Data.

5. PROTECTION OF PERSONAL DATA

5.1 To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures including up-to-date antivirus protection, MD algorithm encryption and SSL technology to secure storage and transmission of Personal Data, and disclosing Personal Data both internally and to third party service providers and agents only on a need-to-know basis.

5.2 EyRIS protects the Personal Data it collects in a secure database with important data encrypted, and the database servers are hosted in protected data centers located in Singapore.

5.3 You should be aware, however, that no method of transmission or storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

5.4 It is imperative that you have measures to safeguard against unauthorised access to your password and to your personal devices. Please ensure that you read and understand the Terms of Use.

6. ACCESS TO AND CORRECTION OF PERSONAL DATA

- 6.1 If you wish to make a request for access to a copy of the Personal Data which we hold about you or information about the ways in which we use or disclose your Personal Data, or a request to correct or update any of your Personal Data which we hold about you, you may submit your request via email to: customercare@eyris.io. A fee may be charged for an access request. We will respond to your request as soon as reasonably possible.
- 6.2 Should we not be able to respond to your request within [30] days after receiving your request, we will inform you in writing within [30] days of the time by which we will be able to respond to your request.

7. ACCURACY OF PERSONAL DATA

- 7.1 We generally rely on Personal Data provided by you or your authorised representative. In order to ensure that your Personal Data is current, complete and accurate, please update us if there are changes to your Personal Data via email to: customercare@eyris.io.

8. RETENTION OF PERSONAL DATA

- 8.1 We may retain your Personal Data for as long as it is reasonably necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws, rules or regulations, and thereafter we will cease to retain your Personal Data, or remove the means by which the data can be associated with you.

9. TRANSFER OF PERSONAL DATA OUT OF COUNTRY

- 9.1 Your Personal Data may be transferred from the country in which you are present while you are using the Website (“**Home Country**”) to another country where our affiliates, business partners, authorised agents, third party service providers or data storage facilities are located. You understand and consent to the transfer of your Personal Data outside of your Home Country. To the extent that we need to transfer your Personal Data outside your Home Country, we will endeavour to do so in accordance with the PDPA to provide a standard of protection for your Personal Data so transferred that is comparable to that provided under the PDPA.

10. THIRD PARTY SITES

- 10.1 Our Website may contain links to sites operated by entities other than EyRIS (“**Hyperlinks**”). The Hyperlinks are provided for convenience only. The linked sites are not subject to EyRIS’s control and are governed by their own privacy policies. Once you have left the Website, you should check the applicable terms, conditions and policies of the third-party sites to determine how they will handle any information they collect from you.

11. WITHDRAWING CONSENT

- 11.1 The consent that you provide for the collection, use and disclosure of your Personal Data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop using and/or disclosing your Personal Data for any or all of the purposes listed above by submitting your request in writing or via email to: customercare@eyris.io.
- 11.2 Please note that if your Personal Data has been provided to us by a third party, you should contact such party directly to make any queries, feedback, and access and correction requests to EyRIS on your behalf.
- 11.3 Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and obligations. In general, we shall seek to process your request within [five (5)] business days of receiving it.
- 11.4 We fully respect your decision to withdraw your consent. However, depending on the nature and scope of your request, we may not be able to continue providing our services to you. In such circumstances we sha. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in 11.1 above.
- 11.5 Please note that withdrawal of consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws, rules or regulations.
- 11.6 Your Personal Data may be retained for a reasonable period after your relationship with us has been altered in any way or has ended, for reasonable purposes, such as to resolve any concerns between you and us.

12. USE OF COOKIES

- 12.1 If you would like to manage, block or delete cookies you should be able to do so through your internet browser. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of the Website. By using the Website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.
- 12.2 EyRIS uses cookies to recognise your browser or device, and provide you with essential features and services for additional purposes, including;
 - (i) conducting diagnostics and statistical analysis to improve the Website;
 - (ii) measuring and analysing the performance of the Website
 - (iii) preventing fraudulent activity;
 - (iv) improving security;
- 12.3 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.
- 12.4 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.

13. CHANGES TO POLICY

PERSONAL DATA PROTECTION POLICY



- 13.1 This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.
- 13.2 We reserve the right, at our sole discretion, to change, modify or otherwise alter this Policy at any time, by posting the revised Policy on this page. Your continued use of the Website constitutes your acknowledgement and acceptance of such changes, modifications and alterations. Please check regularly for updated information on the handling of your Personal Data.