



Privacy Policy

OneQode Group

V.23.11.7

Privacy Policy

1 Background

1.1 Privacy Law.

- (a) We recognise and value the protection of your personal information, and that you have an interest in our collection and use of your personal information.
- (b) We have implemented this Privacy Policy in accordance with applicable privacy laws and other data protection rules in order to be open and transparent about how we collect, hold, and use your personal information, and under what circumstances we may disclose or transfer it.
- (c) Please note that this Privacy Policy forms part of OneQode Singapore Pte Ltd's, or its affiliate, should they be the signer, ("**OneQode**", "**we**", "**our**", "**us**" and other similar term) terms and conditions of our various agreements with you, if any.

1.2 **Disclaimer.** While your privacy is of paramount importance to us, nothing in this privacy policy constitutes a voluntary opt into any privacy laws, anywhere in the world, which we are not statutorily bound to comply with.

2 Personal Information

2.1 **What is "Personal Information".** Personal information held by us may include your:

- (a) name and date of birth;
- (b) residential and business postal addresses, telephone/mobile/fax numbers and email
- (c) addresses;
- (d) bank account and/or credit card details for agreed billing purposes;
- (e) any information that you provided to us by you during an account creation process or added to your user profile;
- (f) preferences and password for using our software and services;
- (g) your computer and connection information; and

(h) any information that you otherwise share with us.

2.2 **Collection.** We collect personal information when you use our [website](#) and any associated services or software, including (without limitation) when you:

- (a) use our software, services or the software and services of any associated third parties under an agreement with us;
- (b) create an account;
- (c) enter information on software or services which we provide to you;
- (d) add information to your user profile(s);
- (e) purchase any services or software through us or our site;
- (f) complete an online contact form to contact us or any third party supplier;
- (g) provide information to us by telephone or through marketing forms; or
- (h) send us an email or other communication,

in order to assist you with the supply of products, the provision of services and any related assistance or other purposes requested through such communication.

2.3 **Direct Collection.** Information will only be collected directly from you unless you authorise another person to provide the information.

2.4 **IP Addresses.** We may also collect Internet Protocol or 'IP' addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. We collect and manage IP addresses as part of the service of providing internet session management and for security purposes. We may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, the website and any products/services.

2.5 **Use.** The personal information you provide is used for purposes related to our primary business operations, which is providing software and services to third party organisations, government bodies and associated individuals. Examples of when your information may be used include:

- (a) providing you with the products and services you have requested;

- (b) administration needs in relation to providing you with products and service, including your account;
- (c) dealing with requests, enquiries or complaints and other customer care related activities;
- (d) verifying your identity;
- (e) informing you about our products and services;
- (f) assisting you to use functionality on the website or services;
- (g) processing any purchases of services that you may make through us or this site, including charging, billing and collecting debts;
- (h) making changes to your account(s);
- (i) responding to any queries or feedback that you may have;
- (j) conducting appropriate checks for credit-worthiness and for fraud;
- (k) preventing and detecting any misuse of, or fraudulent activities involving, this site, the services or software;
- (l) conducting research and development in respect of our services;
- (m) gaining an understanding of your information and communication needs or obtaining your feedback or views about our services in order for us to improve them;
- (n) maintaining and developing our business systems and infrastructure, including testing and upgrading of these systems,
- (o) marketing our products and services generally; and
- (p) carrying out any activity in connection with a legal, governmental or regulatory requirement imposed on us or in connection with legal proceedings, crime or fraud prevention, detection or prosecution; and
- (q) for any other purpose reasonably considered necessary or desirable by us in relation to the operation of our business.

- 2.6 **Additional Use of Personal Information.** We may also use personal information for purposes (as would be reasonably expected by you) in connection with those activities described above. We will not use your information for purposes other than as described in this privacy policy unless we have your consent, or there are specific law enforcement, public health or safety reasons.

3 Cookies, Pixels and Web Beacons.

3.1 Our Use of Cookies, Pixels and Web Beacons.

- (a) This site and our products and services may use 'cookies' to help personalise your online experience. A cookie is a text file or a packet of information that is placed on your hard disk by a web page server to identify and interact more effectively with your computer. There are two types of cookies that may be used by us: a persistent cookie and a session cookie.
- (b) A persistent cookie is entered by your web browser into the 'Cookies' folder on your computer and remains in that folder after you close your browser, and may be used by your browser on subsequent visits to this site. A session cookie is held temporarily in your computer's memory and disappears after you close your browser or shut down your computer.
- (c) Cookies cannot be used to run programs. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. In some cases, cookies may collect and store personal information about you. We extend the same privacy protection to your personal information, whether gathered via cookies or from other sources.
- (d) You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of this site.

3.2 Why We Use Cookies. This site and our other services may use cookies in order to:

- (a) remember your preferences;

- (b) recognise you as logged in while you remain so (if applicable). This avoids your having to log in again every time you visit a new page;
- (c) show relevant notifications to you (eg, notifications that are relevant only to users who have, or have not, created an account or subscribed to newsletters or email or other subscription services); and
- (d) remember details of data that you choose to submit to us (eg, through online contact forms or by way of comments, forum posts, chat room messages, reviews, ratings, etc).

Many of these cookies are removed or cleared when you log out but some may remain so that your preferences are remembered for future sessions.

3.3 **Third Party Cookies.** In some cases, third parties may place cookies through this site. For example:

- (e) Google Analytics is one of the most widespread and trusted website analytics solutions, and may use cookies de-identified data about how long users spend on this site and the pages that they visit;
- (f) Google AdWords is one of the most widespread and trusted website advertising solutions, and may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you;
- (g) Facebook Pixel is a re-marketing cookie and service which allows us to advertise to previous visitors on this site based upon their activity. The pixel triggers based on actions you take on our website and means we can reach you again using Facebook's re-marketing tools. We can also use the Pixel to tailor our marketing to better suit your needs and to only display advertisements that are relevant to you on both the Facebook platform and third party websites. None of your personal Facebook information is reported to us by our use of the Pixel, and Facebook implements their Pixel service in accordance with their terms and privacy policy. Facebook has also enabled privacy functionality within their platform that enables you to opt out of targeted advertising if you wish, so we recommend you take advantage of that if you have any concerns; and

- (h) third party social media applications (e.g., Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies to facilitate various social media buttons and/or plugins in this site. Log files track actions occurring on the Websites, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

3.4 **Our Use of Google Analytics.**

- (a) In the case of Google Analytics information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States.
- (b) Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.
- (c) Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf.
- (d) By using this website, you consent to the processing of data about you by Google in the manner described in Google's Privacy Policy and for the purposes set out above. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google.

- 3.5 **Interacting With Us.** If you contact us with a general question, we may interact with you anonymously or through the use of pseudonyms. However, you are required to provide true and accurate details when requesting the supply of products or provision of support services. You agree you will provide accurate information if so required.

4 **Marketing**

4.1 **Direct Marketing.**

- (a) From time to time, we may send you marketing or promotional material. Marketing and promotional material will only be sent to you if you have opted into receiving marketing material.

- (b) We (or an appointed third party) may also conduct surveys or market research and may seek other information from you on a periodic basis. These surveys will provide us with information that allows improvement in the type, quality and the manner in which those products and services are offered to you.
- (c) To opt-out of receiving certain marketing material, you may contact us or select the 'unsubscribe' link provided in the email.

5 Sharing Your Personal Information

5.1 Our Disclosures. We may disclose your personal information to:

- (a) employees, a related company and professional advisors such as our lawyers;
- (b) law enforcement agencies to assist in the investigation and prevention of criminal activities;
- (c) credit-reporting and fraud-checking agencies;
- (d) credit providers (for credit-related purposes such as creditworthiness, credit rating, credit provision and financing);
- (e) government and regulatory authorities and other organisations, as required or authorised by law;
- (f) organisations who manage our business strategies, including those involved in a transfer/sale of all or part of our assets or business (including accounts and trade receivables) and those involved in managing our business risk and funding functions; and
- (g) third party contractors or service providers with whom we have a business association, including:
 - (i) integration providers;
 - (ii) marketing service providers;
 - (iii) accounting service providers; and
 - (iv) information technology service providers including cloud application providers.

5.2 **Consent.** We will not disclose your personal information other than in accordance with this privacy policy without your consent.

5.3 **Overseas Disclosure.**

- (a) We may disclose your personal information third party contractors, service providers or customers with whom we have a business association.
- (b) While we do not otherwise actively disclose your personal information to overseas entities (unless provided for in a separate agreement with you), we do engage service providers (such as cloud data services) who may have international data centres and disaster recovery sites. Consequently, these providers may have access to your information.
- (c) We rely solely on reputable organisations for such cloud services.

6 **Security and Disposal**

6.1 **Security of Your Personal Information.**

- (a) We store your personal information using servers which have built-in measures to combat unauthorised access, modification or disclosure.
- (b) While we endeavour to only hold personal information that is accurate, complete and up-to-date, if you become aware your information is no longer accurate, complete or up-to-date please contact us.

6.2 **Disposal of Personal Information.**

- (a) If we hold personal information about you, and we do not need that information for any purpose, we will take reasonable steps to destroy or de-identify that information, in accordance with the European Union General Data Protection Regulation (“**GDPR**”), unless we are prevented from doing so by law.
- (b) You may make a request to us in writing to remove your personal information and, where permitted, we will do so in accordance with the GDPR.
- (c) We may be required under an applicable law to retain certain information such as financial records that relate to financial transactions, for a specific number of years after the transactions contemplated by those records are completed.

7 Accessing Your Personal Information

7.1 **How to Access Your Personal Information.** Upon your request and after satisfying ourselves of your identity, we will provide access to your personal information we hold except in certain prescribed circumstances which include, where:

- (a) we believe giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- (b) giving you access would be unlawful;
- (c) granting that access would have an unreasonable impact on the privacy of other individuals;
- (d) we would be in breach of our obligations under any applicable law, including those related to technical assistance notices, technical capability notices or computer access warrants from a relevant government agency;
- (e) the request for access is frivolous or vexatious; or
- (f) there are anticipated legal proceedings.

7.2 **Amending Personal Information.** We will amend any personal information about you that is held by us and that is inaccurate, incomplete or out of date if you request us to do so. If we disagree with your view about the accuracy, completeness or currency of a record of your personal information that is held by us, and you ask us to associate with that record a statement that you have a contrary view, we will take reasonable steps to do so.

7.3 **Third Party Websites.** You may click-through to third party websites from this site, in which case we recommend that you refer to the privacy statement of the websites you visit. This Privacy Policy applies to this site only and the Company assumes no responsibility for the content of any third party websites.

8 GDPR

- 8.1 **GDPR.** We welcome the European Union's ("EU") GDPR as an important step forward in streamlining data protection globally. Regardless of whether we are operating an establishment within the EU or are not offering services towards clients in the EU specifically, we intend to comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.
- 8.2 **GDPR Rights.** The requirements of the GDPR are broadly similar to those set out under other applicable privacy laws and include the following rights:
- (a) you are entitled to request details of the information that we hold about you and how we process it. For EU residents, we will provide this information for no fee;
 - (b) you may also have a right to:
 - (i) have that information rectified or deleted;
 - (ii) restrict our processing of that information;
 - (iii) stop unauthorised transfers of your personal information to a third party;
 - (iv) in some circumstances, have that information transferred to another organisation; and
 - (v) lodge a complaint in relation to our processing of your personal information with a local supervisory authority; and
 - (c) where we rely upon your consent as our legal basis for collecting and processing your data, you may withdraw that consent at any time.
- 8.3 **Consequence of Objection.** If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, please be aware that:
- (a) such objection or withdrawal of consent could mean that we are unable to provide our services to you, and could unduly prevent us from legitimately providing our services to other clients subject to appropriate confidentiality protections; and
 - (b) even after you have chosen to withdraw your consent, we may be able to continue to keep and process your personal information to the extent required or otherwise permitted by law, in particular:

- (i) to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and which does not materially impact on your rights, freedoms or interests; and
- (ii) in exercising and defending our legal rights and meeting our legal and regulatory obligations.

9 Laws and Recommendations

9.1 Compliance with Applicable Assistance and Access Laws.

- (a) The laws of particular jurisdictions may compel companies to share data with government intelligence agencies and law enforcement, or build in data sharing mechanisms which may report directly to these agencies. While we endeavour to protect your data and our technology from vulnerabilities wherever possible, we cannot break the law, nor can we inform you when we have been issued with a notice under any such laws.
- (b) By using our platform or website, you expressly release and indemnify us from any liability to you which arises from sharing data or building data sharing mechanisms (including 'back-doors' and vulnerabilities) into our technology at the direction of any relevant government or its agencies, including where those mechanisms are later exploited by a third party.

9.2 **User Security.** New digital threats are emerging all the time, and the online environment is more hostile than ever. To protect your data online, including any data or material transmitted by you to us, we recommend reading, implementing and observing any relevant procedures and safety tips recommended by government bodies such as the Cyber Security Agency of Singapore (<https://www.csa.gov.sg>) and the Australian Cyber Security Centre (<https://www.acsc.gov.au>) and other relevant bodies from time to time.

10 Complaints and Contact Information

10.1 **Complaints Procedure.** Your privacy is important to us. If you have a complaint or concerns about our information handling processes as they relate to your personal information, we ask that you first contact our Privacy Officer whose contact details are listed below.

If, after we our investigations conclude, you are unsatisfied, we advise consulting with:

The Personal Data Protection Commission

10 Pasir Panjang Road, #03-01 Mapletree Business City,
Singapore 117438
Telephone: +65 6377 3131
Email: info@pdpc.gov.sg

For Australian residents only:

The Office of the Australian Information Privacy Commissioner
GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

10.2 How to Contact Us. If you have any queries, questions, concerns or wish to make a complaint regarding how we deal with your personal information please contact us:

OneQode Group
Level 29, Chifley Tower, 2 Chifley Square
Sydney NSW 2000
Email: legal@oneqode.com
Attn: Privacy Officer

11 Amendments

11.1 Amendments to this Privacy Policy.

- (a) We are obligated to regularly review and update this policy. We therefore reserve the right to amend this Privacy Policy at any time. Should any significant amendments occur, notification will be provided on the website after the changes have been made. Your continued use after you receive the notification indicates your consent to be bound by the amended Privacy Policy.
- (b) For further information about privacy in general, please refer to the For further information about privacy in general, please refer to the Personal Data Protection Commission's website located at <http://www.pdpc.gov.sg> or, for Australian customers, the Office of the Australian Information Commissioner's website located at <http://www.oaic.gov.au>.
- (c) Alternatively, please contact our Privacy Officer using the details provided above.