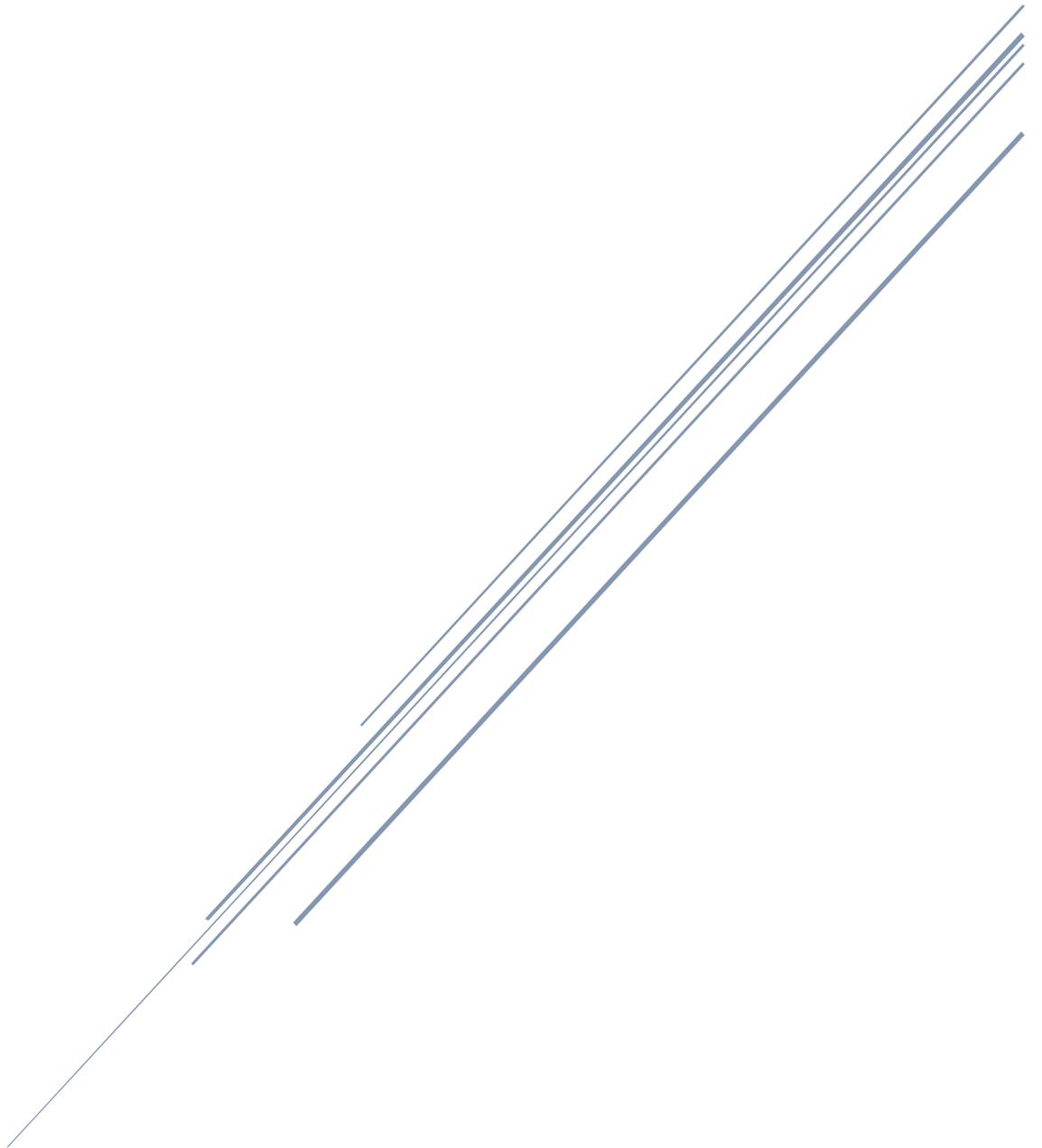


# PRIVACY POLICY

SEEKOUT



## Privacy Policy

Seekout (“Seekout”, “we”, “us” or “our”) respects your privacy. When it comes to your personal information, we believe in transparency, not surprises. That’s why we’ve set out here what personal information we collect, what we do with it and your choices and rights.

By using any of Seekout Services, you confirm you have agreed to the Terms of Service and read and understood this Privacy Policy.

### **1. Some key terms**

In our Privacy Policy, when we refer to “you”, “Clients”, we mean our Clients who subscribe to our Services, and “Users”, “End Users” refers to visitors who surf on our website for casual purpose. Any other capitalized terms not defined in this Privacy Policy have the meanings in our Terms of Service.

### **2. How does this Privacy Policy apply?**

This Privacy Policy describes what we do with personal information that we collect and use for our own purposes (i.e., where we are a controller), such as your account information and information about how End User use and interact with our Services, including information you submit to our customer support as well as certain information relating to our End Users.

We also host and process Contents provided by our Clients. Our Clients tell us what to do with their Content, and we follow their instructions. This Privacy Policy does not describe what we do with Client Contents with their instructions (i.e., as their processor). If you want to know about what we do for our own purposes, read on.

### **3. Personal information we collect**

We collect various personal information regarding you or your device. This includes the following:

- Information Our Client/User provide to create give a feedback/ business enquiry or leaving a review on our webpage. Specifically email address, first name and last name. If you sign up for Paid Services, we receive a portion of your payment information from our payment processor (such as the last four digits, the country of issuance and the expiration date of the payment card) and we ask you to select your jurisdiction.
- Information User share with us in connection with feedbacks, enquiries or leaving a review.
- Information from User use of the Services on our website. This includes: IP addresses, preferences, information about how you interact with the Services and our Users’ sites (such as timestamps, clicks, scrolling, browsing times, searches, transactions, referral pages, load times, and problems you may encounter, such as loading errors).
- Information we get from our partners to support our marketing initiatives, improve our Services and better monitor, manage and measure our ad campaigns, such as details about when our partner shows you one of our ads on or via its advertising platform.

### **4. How we collect personal information**

We obtain personal information from various sources. We do this in three main ways:

- We record some of it automatically when User use our website (including with technologies like cookies).
- We receive some of it from third parties (i.e. when you make payments to us using our payment processor).

We've described this in more detail below.

#### a. Personal information obtained from your use of our Services

When User use our Services, we collect information about your activity on and interaction with the Services, such as your IP address(es), your device and browser type, the web page our visitor visited before coming to our sites, what pages on our sites you visit and for how long and identifiers associated with your devices. If the End User have given us permission through your device settings, we may collect your location information in our website. We also collect information from you such as your name/email address in order for you to leave a feedback/business enquiry in our service.

If you are a User of our website, we also get information about your interactions with our individual web page, though we use this in anonymous, aggregated or pseudonymized form which does not focus on you individually. We use this data to evaluate, provide, protect or improve our Services (including by developing new products and services).

Some of this information is collected automatically using cookies and similar technologies when User use our Services and this information are collected automatically through your browser or from your device.

#### b. Personal information obtained from other sources

If User use a Third-Party Service (such as Facebook) to register for an Account, the Third-Party Service may provide us with your Third-Party Service account information on your behalf, such as your name and email address (we don't store passwords you use to access Third Party Services). Your privacy settings on the Third-Party Service normally control what they share with us. Users are advised to be comfortable with what they share by reviewing their privacy policies and, if necessary, modifying your privacy settings directly on the Third-Party Service.

Seekout use stripe as our third-party payment platform. When our Clients subscribe and list their business with us, we use stripe to process the payment. Seekout obtain limited information about our Client payment card from our payment processor, such as the last four digits, the country of issuance and the expiration date. Currently, our payment processor is Stripe. Stripe uses and processes your complete payment information in accordance with Stripe's privacy policy.

### **5. How we use your personal information**

We use the personal information we obtain about you to:

- Communicating with you. Communicate with you, including by sending you emails about your transactions and Service-related announcements. • To provide and maintain the Service
- To notify you about changes to our Service
- To allow you to participate in interactive features of our Service when you choose to do so

- To provide customer care and support
- To provide analysis or valuable information so that we can improve the Service
- To monitor the usage of the Service
- To detect, prevent and address technical issues

We process your personal information for the above purposes when:

- Consent. You have consented to the use of your personal information in a particular way. When you consent, you can change your mind at any time.
- Performance of a contract. We need your personal information to provide you with services and products requested by you, or to respond to your inquiries. In other words, so we can perform our contract with you or take steps at your request before entering into one. For example, we need your email address to address your inquiries.
- Legal obligation. We have a legal obligation to use your personal information, such as to comply with applicable tax and other government regulations or to comply with a court order or binding law enforcement request.
- Protecting you and others. To protect your vital interests, or those of others.

## **6. How we share your personal information**

We share personal information in the following ways:

- Affiliates. We share personal information with our affiliates when it is reasonably necessary or desirable, such as to help provide services to you or analyse and improve the services we or they provide.
- Business partners. We may share personal information with business partners. For example, we may share your personal information when our Services are integrated with their Third-Party Services, but only when you have been informed or would otherwise expect such sharing.
- Service providers. We share personal information with our service providers that perform services on our behalf. For example, we may use third parties to help us provide customer support, manage our advertisements on other sites, send marketing and other communications on our behalf or assist with data storage.
- Process payments. We transmit your personal information via an encrypted connection to our payment processor, Stripe.
- Following the law or protecting rights and interests. We disclose your personal information if we determine that such disclosure is reasonably necessary to comply with the law, protect our or others' rights, property or interests (such as enforcing our Terms of Service) or prevent fraud or abuse of Seekout or our Clients or End Users. In particular, we may disclose your personal information in response to lawful requests by public authorities, such as to meet national security or law enforcement requirements.
- Business transfers. If we're involved in a reorganization, merger, acquisition or sale of some or all of our assets, your personal information may be transferred as part of that deal.

## **7. How we protect your personal information**

We maintain administrative, technical and physical safeguards that are intended to appropriately protect against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse and any other unlawful form of processing of, the personal information in our possession. We employ security measures such as using firewalls to protect against intruders and protecting against network vulnerabilities.

## **8. How we retain your personal information**

We retain personal information regarding you or your use of the Services for as long as your Account is active or for as long as needed to provide our Client or End user with the Services. We also retain personal information for as long as necessary to achieve the purposes described in this Privacy Policy, for example, to comply with our legal obligations, to protect us in the event of disputes and to enforce our agreements and to protect our and others' interests.

The precise periods for which we keep your personal information vary depending on the nature of the information and why we need it. Factors we consider in determining these periods include the minimum required retention period prescribed by law or recommended as best practice, the period during which a claim can be made with respect to an agreement or other matter, whether the personal information has been aggregated or pseudonymized, and other relevant criteria. For example, the period we keep your email address is connected to how long your Account is active, while the period for which we keep a support message is based on how long has passed since the last submission in the thread.

You may delete your Account with us by following the set of instruction stated in our Seekout CMS.

Please note that in the course of providing the Services, we collect and maintain aggregated, anonymized or de-personalized information which we may retain indefinitely.

## **9. Data transfers**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Singapore and choose to provide information to us, please note that we transfer the data, including Personal Data, to Singapore and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

SeekOut will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **10. Analytics**

Seekout use google analytics to monitor and analyze the use of our Service. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising

network. You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

## **10. Updates to this Privacy Policy**

We'll update this Privacy Policy from time to time to reflect changes in technology, law, our business operations or any other reason we determine is necessary or appropriate. When we make changes, we'll update the "Effective Date" at the bottom of the Privacy Policy and post it on our websites. If we make material changes to it or the ways we process personal information, we'll notify you (by, for example, prominently posting a notice of the changes on our Seekout CMS dashboard before they take effect or directly sending you an email).

We encourage you to check back periodically to review this Privacy Policy for any changes since your last visit. This will help ensure you better understand your relationship with us, including the ways we process your personal information.

## **11. How to contact us**

If you have questions, comments or complaints about this Privacy Policy or our privacy practices or if you would like to exercise your rights and choices, please email us at [support@seekout.sg](mailto:support@seekout.sg)

Effective Date: 11/10/2018