

PRIVACY POLICY

This policy sets out the basis on which Sign Pte Ltd of 808, French Road, #07- 157, Kitchener Complex, Singapore 200808 (Unique Entity Number 202047777D) (together with our subsidiaries, our holding company, subsidiaries of our holding company from time to time, collectively called "**Sign.net**" or "**we**", "**us**" or "**our**") collects personal data from you and how we process such data.

By visiting our website <https://www.sign.net> (our "**Site**") or using Sign.net Mobile Application or any other applications or software we provide from time to time (collectively our "**App**"), customers and other individuals (collectively "**you**") accept and consent to the practices set out below.

Sign.net's core product and App help users create, complete, and show the validity of digital or electronic transactions. As part of our Site and App, users want us to collect and record information that helps the parties prove the validity of the transactions. This information includes the persons who are involved in the transactions and the devices those persons use.

We recommend that you read this Privacy Policy in full to ensure you are fully informed.

1 Collection of information

You have choices about whether you visit our sites, install our apps, or provide personal information of use. However, if you do not provide us with certain personal information, you may not be able to use some parts of our App. For example, if you do not adopt an electronic signature, then you will not be able to sign certain electronic documents on our App.

1.1 For the purposes outlined in Clause 2, we may collect and process the following information about you:

(a) *Information you give us* - information that you provide us (which may include your name, government issued identity number, address, email address, telephone number, credit card information, billing information and other personal description) by filling in forms on our Site or our App, or by corresponding with us (by phone, email or otherwise), for example:

(i) when you register for an account with us on our Site and in our App;

(ii) when you create or edit your user profile;

(iii) when you purchase products and services;

(iv) when you participate in an electronic transaction;

(v) when you report any problem to us;

(vi) when you use certain features on our Site or our App;

(vii) when you request any support from us; or

(viii) when you complete any survey or questionnaire we send you.

(b) *Information we collect about you* - information automatically collected when you visit our Site or use our App, for example:

(i) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet and your log-in information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; details of any transactions, purchases and payments you made on our Site and in our App;

(ii) information about your visit, including the full Uniform Resource Locators (URLs), clickstream to, through and from our site (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number; and

(b) *Information we receive from third parties* –

(i) **Third-Party Sources.** We work with third parties and we may receive information about you from them, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, or credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

(ii) **Other Customers.** Other customers may give us your personal information. For example, if a customer wants you to sign an electronic document in our App, he or she will give us your email address and name.

(iii) **Combining Personal Information from Different Sources.** We may combine the personal information we receive from other sources with personal information we collect from you (or your devices) and use it as described in this Privacy Policy.

1.2 We only retain personal data for so long as it is necessary. Data may be archived as long as the purpose for which the data was used still exists. Where there are technical limitations that prevent delegation or anonymization, we safeguard personal information and limit active use of it.

2 Uses made of the information

2.1 We use information held about you for the following purposes:

(a) providing, improving and developing our services, including without limitation, using the information to verify and authenticate the user transacting in a digital signature activity and showing it to all parties as part of the digital signing process;

- (b) researching, designing and launching new features or products;
- (c) managing the support systems and security of our services;
- (d) preventing, investigating and responding to: fraud, unauthorized access to or use of our App, breaches of terms and policies, or other wrongful behavior;
- (e) complying with legal obligations or for litigating court mandated cases;
- (f) presenting content and information in our Site and our App in the most effective manner for you and for the device you use;
- (g) providing you with alerts, updates, materials or information about our services or other types of information that you requested or signed up to;
- (h) for direct marketing purposes (please see further details in Clause 2.2 below);
- (i) communicating with you and responding to your questions or requests; and
- (j) purposes directly related or incidental to the above.

2.2 We intend to use your personal data in direct marketing (i.e. offering or advertising products or services by sending the relevant information directly to you). By using our services, you agree that consent has been given to us for such direct marketing activities. **You may opt out any time.** For the purpose of this clause:

- (a) the personal data that may be used in direct marketing are those that you provide to us or we collect from you under Clause 1.1 above;
- (b) the type of services or products that may be offered or advertised will be our online digital signing services and related partner services;
- (c) the relevant information may be sent to you by Email, Mobile phone notifications and SMS;
- (d) you may opt out any time by Contacting us at help@sign.net. We will cease to send you marketing information without charge.

2.3 Generally, all your personal data will be processed in Singapore. In certain situations, we may transfer your personal data to a country outside of Singapore for the above Purposes as may be required on a need to know basis. In such an event, we will ensure that the receiving entities are bound by laws or contractual obligations for the protection of your personal data to a standard comparable to the Singapore Personal Data Protection Act 2012 (“**PDPA**”):

2.4 **Other uses.** We may combine the personal information we collect (“**aggregate**”) or remove pieces of personal information (“**de-identify**”) to limit or prevent identification of any

particular user or device to help with goals like research and marketing. This Privacy Policy does not apply to our use of such aggregated or de-identified information.

3 Disclosure of your information

We will keep your personal data we hold confidential but you agree we may provide information to:

- (a) any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in Section 5 of the Companies Act (Chapter 50);
- (b) personnel, agents, advisers, auditors, contractors, financial institutions, and service providers in connection with our operations or services (for example staff engaged in the fulfilment of your order, the processing of your payment and the provision of support services);
- (c) our overseas offices, affiliates, business partners and counterparts (on a need-to-know basis only);
- (d) persons under a duty of confidentiality to us;
- (e) persons whom you have asked us to do so or have given consent;
- (f) your employer or organization, if your account is with an email address assigned to you as an employee, contractor or member of an organization, such as abc@xyz.com or abc@non-profit.org;
- (g) persons to whom we are required to make disclosure under applicable laws and regulations in any part of the world; or
- (h) actual or proposed transferees of our operations (or a substantial part thereof) in any part of the world.

4 Cookies

- 4.1 Our Site uses cookies to distinguish you from other users of the Site. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site.
- 4.2 A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree to the use of cookies. Cookies contain information that is transferred to your computer's hard drive.
- 4.3 We use persistent cookies and session cookies. A persistent cookie stays in your browser and will be read by us when you return to our Site or a partner site that uses our services. Session cookies only last for as long as the session (usually the current visit to a website or a browser session).
- 4.4 We use the following cookies:

- (a) Strictly necessary cookies – These are cookies that are required for the operation of our Site. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.
- (b) Analytical/performance cookies – They allow us to recognise and count the number of visitors and to see how visitors move around our Site when they are using it. This helps us to improve the way our Site works, for example, by ensuring that users are finding what they are looking for easily.
- (c) Functionality cookies – These are used to recognise you when you return to our Site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- (d) Targeting cookies – These cookies record your visit to our Site, the pages you have visited and the links you have followed. We will use this information to make our Site and the information displayed on it more relevant to your interests.

4.5 You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you do so, you may not be able to access all or parts of our Site.

4.6 We may use third-party web services on our Site. The service providers that administer these services use technologies such as cookies (which are likely to be analytical/performance cookies or targeting cookies), web server logs and web beacons to help us analyse how visitors use our Site and make the information displayed on it more relevant to your interests. The information collected through these means (including IP addresses) is disclosed to these service providers. These analytics services may use the data collected to contextualise and personalise the marketing materials of their own advertising network.

Analytics. We use services like Google Analytics and Mixpanel. They use cookies to gather usage data and help us learn how people use our App, such as the pages they visit and for how long the website or page they were on before coming to a Sign.net website.

5 Lawful Basis for Processing Your Personal Information. If Singapore PDPA applies and Sign.net acts as a controller, our lawful basis for collecting and using the personal information described in this Privacy Policy will depend on the personal information concerned and the specific context in which we collect our use it.

We normally collect or use personal information from you or others only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may have a legal obligation to collect or retain personal information or may need the personal information to protect your vital interests or those of another person. For example, when we:

- Use personal information to create and manage an account, we need it in order to

provide the App;

- Gather and record data associated with use of a digital certificate or digital signature, it is to comply with regulations;
- Use names and email addresses for email marketing purposes, we do so with your consent (which you can withdraw at any time);
- Gather usage data and analyze it to improve our App, we do so based on our legitimate interest in safeguarding and improving our App.

If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information, please contact us at help@sign.net.

6 Third-party sites

Our Site, our App or our communication with you may from time to time contain links to third-party websites over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. We encourage you to read the privacy policies or statements of these websites understand your rights. We accept no responsibility or liability for any practices of third-party websites.

7 Security

- 7.1 All information you provide to us is stored on third party secured servers.
- 7.2 Any payment transactions will be encrypted using Secure Sockets Layer (“SSL”) technology.
- 7.3 Sensitive personal information is encrypted with individual keys, including Google Keypair service and other third party vendors.
- 7.4 Where we have given you (or where you have chosen) a password that enables you to access certain parts of the Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. However, we may routinely reset user account passwords should there be suspicion of potential breaches.
- 7.5 We restrict access to personal information to our employees, service providers and contractors on a strictly need-to-know basis and ensure that those persons are subject to contractual confidentiality obligations.

- 7.6 We review our information collection, storage and processing practices from time to time to guard against unauthorised access, process or use.
- 7.7 Please note, however, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk.

8 Children's privacy

Our App is not designed for and are not marketed to people under the age of 18 ("minors"). We do not knowingly allow minors to use our App. If you are a minor, please do not use our App or send us your personal information. We delete personal information that we learn is collected from a minor without verified parental consent.

9 Your rights

- 9.1 You have the right to:
- (a) check whether we hold personal data about you;
 - (b) access any personal data we hold about you; and
 - (c) require us to correct any inaccuracy or error in any personal data we hold about you.
- 9.2 Any request under Clause 7.1 may be subject to a small administrative fee to meet our cost in processing your request.

10 Your choices

This section describes many of the actions you can take to change or limit the collection or use of your personal information.

- **Profile.** If any personal information is inaccurate or incomplete, you can make changes in your account settings.
- **Marketing messages.** You can opt out of email marketing messages we send. You can opt out of these messages by clicking on the "unsubscribe" link in the email message or in any other method specified in this Policy. If you are a registered user of our App, or if you have engaged in transactions with us, we may continue to send transactional or relationship messages (e.g., signing notifications or account notifications) after you opt out of marketing messages.
- **Cookies and Other Related Technology.** You can decline cookies through your browser settings. However, if you decline cookies, you may not be able to use some parts of our App.
- **Device and usage information.** If you do not want us to see your device location, you can turn off location sharing on your device, change your device privacy settings, or decline to share location on your browser.

- **Closing your account.** If you wish to close your account, please log in to your account and edit your plan. Our staff will expunge your records from our systems.

11 Changes to our privacy policy

We may amend this policy from time to time by posting the updated policy on our Site. By continuing to use our Site and our App after the changes come into effect means that you agree to be bound by the revised policy. Depending on the type of change, we may choose to notify you of the change by posting on this page or by email. Please periodically review this Privacy Policy and carefully review any changes made to this Privacy Policy.

12 Contact us

If you have any questions, comments or requests regarding personal data, please address them to:

Data Privacy Officer

help@sign.net

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