

PRIVACY POLICY

(last updated 26th October 2018)

1. SCOPE

This privacy policy describes how Innosparks Pte. Ltd ("**Innosparcs**", "**us**", "**we**" or "**our**") will use any personal data you provide through this website. Please read it carefully before you proceed.

We comply with relevant data protection legislation in your jurisdiction in relation to the collection, use and disclosure of your personal data. This privacy policy regulates the processing of personal data relating to you and grants you various rights in respect of your personal data.

Personal data means any information relating to an identified or identifiable natural person.

2. WHAT INFORMATION DO WE COLLECT?

We collect and process personal data about you when you interact with us and our website, create an account on our website, and/or purchase products from us. This includes:

- your name, username and password;
- your email address and phone number;
- your home address;
- your state and country of residence;
- your payment and delivery details, including billing address and credit card details, where you make purchases from us;
- your IP address and browser location when visiting our website and at the time of purchase;
- information related to the browser or device you use to access our website;
- analytical information regarding your usage of our website; and
- your marketing preferences, including any consents you have given us.

We will indicate if the collection and provision of certain categories of personal data is mandatory. For any such categories, we may not be able to provide you with proper access to our website and/or the products you have ordered if you do not provide us with the required information. Although we do our best to honour the privacy preferences of our visitors, we are not able to respond to Do Not Track signals from your browser at this time.

If you provide personal data of any third party to us, you represent that you have obtained the required consent from the relevant third party to share and transfer his/her personal data to us.

3. HOW DO WE USE THIS INFORMATION, AND WHAT IS THE LEGAL BASIS FOR THIS USE?

We process this personal data for the following purposes:



- **Performance of a contract** - To fulfil a contract, or take steps linked to a contract: this is relevant where you order a product from us. This includes:
 - verifying your identity;
 - taking and processing payments or credit transactions;
 - communicating with you;
 - processing orders you submit through our website;
 - delivering products you have purchased through our website; and
 - providing after-sales support to you.

- **Legitimate purpose** - Where we have a legitimate interest. This includes:
 - where we use information you provide to personalise our website, products or services for you;
 - responding to or following up on your comments and questions;
 - where we monitor customer accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law;
 - monitoring use of our websites and online services, and use your information to help us monitor, improve and protect our products, content, services and websites, both online and offline; and
 - conducting research, analysis and analytics;

- **Consent** - Where you give us consent:
 - subject to your consent, send you notifications and to inform you about new features or products we think you would be interested in. You may withdraw your consent by contacting us at the email address provided below or follow the steps to unsubscribe which are presented in communications you receive from us;
 - we place cookies and use similar technologies in accordance with our Cookies Policy and the information provided to you when those technologies are used;
 - on other occasions where we ask you for consent, we will use the data for the purpose which we explain at that time.

- **Required by law** - For purposes which are required by law:
 - in response to requests by government or law enforcement authorities conducting an investigation.

In certain jurisdictions, consent is the primary ground on which personal data may be processed by an organisation. In those jurisdictions, processing personal data in connection with the performance of a contract or legitimate purposes is not recognised as an accepted ground on which personal data may be processed. Accordingly, if you are a resident in such a jurisdiction, you agree that consent will be the ground on which we will process your personal data instead of performance of a contract or legitimate purposes.



Withdrawing consent or otherwise objecting to direct marketing

Wherever we rely on your consent, you will always be able to withdraw that consent, although we may have other legal grounds for processing your data for other purposes, such as those set out above. In some cases, we are able to send you direct marketing without your consent, where we rely on our legitimate interests. You have an absolute right to opt-out of direct marketing, or profiling we carry out for direct marketing, at any time. You can do this by following the instructions in the communication where this is an electronic message, or by contacting us using the details set out below.

Please note that even if you opt-out of receiving marketing communications, we may need to send you service-related communications such as confirmations of any future orders you may make.

4. WHO WILL WE SHARE THIS DATA WITH, WHERE AND WHEN?

We may disclose or transfer your personal data to other entities within the Singapore Technologies Engineering Ltd group of companies (click [here](#) for a list of entities) for the purposes set out above.

We may employ the services of a third party to help us in certain areas, such as payment processing, order delivery, website hosting, maintenance, call centre operation and identity checking. In some cases these third party may receive your personal data.

We may use aggregated information so we can administer and improve our website, analyse trends, gather broad demographic information and detect suspicious or fraudulent transactions. We may pass this information to third parties.

If you provide a credit or debit card, we may also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud.

If false or inaccurate information is provided and fraud is identified, details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organisations may also access and use this information to prevent fraud and money laundering.

We reserve the right to disclose your personal data if required or authorised to do so by law. In the event of a corporate sale, merger, reorganisation, dissolution or similar event, your personal data may be part of the assets that is transferred. You consent to such transfer and you acknowledge and agree that any successor or acquirer of Innosparks or its assets will continue to have the right to use your personal data and other information in accordance with the terms of this privacy policy.

5. TRANSFER OF YOUR INFORMATION OUTSIDE YOUR HOME JURISDICTION

We may transfer some of your personal data out of your home jurisdictions. Some of these countries may not have the same or substantially similar privacy laws than those of your home jurisdiction. In those circumstances, we will ensure that data is adequately protected by appropriate contractual clauses or binding corporate rules so as to provide you with a standard of protection that is at least comparable to the protection of your home jurisdiction.

6. STORAGE AND SECURITY

We will use all reasonable endeavours to maintain the security of your personal data and to protect your personal data from misuse, interference and loss and against unauthorised collection, copying, access, modification or disclosure. We will destroy or anonymise any personal data we hold about you which is no longer required under the terms of this privacy



policy. Where you have chosen a password to create an account, you are responsible for keeping your password confidential. Do not share your password with anyone.

Due to the nature of the Internet, we do not provide any guarantee or warranty regarding the security of your personal data during transmission to or storage by us and you acknowledge that you disclose your personal data to us at your own risk. Please contact us immediately if you become aware or have reason to believe there has been any unauthorised use of your personal data.

7. ACCESS TO YOUR INFORMATION

We will use all reasonable endeavours to keep your personal data accurate, complete, up-to-date, relevant and not misleading. Please contact us using the email address set out below if you would like to access the personal data that we hold about you, correct any personal data that is inaccurate, incomplete or out-of-date, withdraw your consent to the collection, use and disclosure of your personal data or to request that your personal data be deleted. We will use reasonable endeavours to provide a complete list of your personal data, correct or delete your personal data within a reasonable period of receipt of your request. In relation to any request for access to any personal data, we reserve the right to charge a nominal fee for the processing of this request in accordance with applicable local legislation.

Deletion of your account with us will not automatically delete the personal data held about you. If you would like to request that we delete all personal data together with the deletion of your account, please contact us at using the email address set out below. Our ability to comply with your deletion request is subject to any applicable legal or other requirement to maintain certain records of your personal data. In that regard, please note that the deletion of your personal data from our database will result in us not being able to provide you with proper access to our website and/or the products you have ordered.

8. RETENTION OF YOUR INFORMATION

We will only retain your personal data until it is reasonable to assume that such retention no longer serves the purpose for which your personal data was collected and is no longer necessary for legal or business purposes.

9. UPDATING YOUR INFORMATION

You may review, correct, update or change your personal information at any time by contacting us using the email address set out below.

10. CHILDREN

We do not sell products for purchase by persons under the age of 18. If you are under the age of 18, you may only use our website with the consent of and under the supervision of your parent or legal guardian who shall be responsible for all your activities.

11. LINKS

Our website may contain links to other websites over which we have no control. We are not responsible for the security or privacy of any information collected by such websites and, while we do not permit those websites to track your use of our website, we are unable to control whether such tracking mechanisms are implemented by those websites. You should exercise caution, and review the privacy statements applicable to the third-party websites and services you use. The use of online tracking mechanism by those third-party websites and services is subject to those third parties' own privacy policies, and not this privacy policy.



12. **CHANGES TO OUR PRIVACY POLICY**

We reserve the right to update this privacy policy from time to time by posting the updates to this privacy policy on our website. Any updates will become effective immediately after posting and will apply to all information collected about you. Your continued use of our website after any such changes are made constitutes your agreement to this privacy policy as amended.

13. **HOW TO CONTACT US**

All comments, queries and requests relating to our use of your personal data are welcomed and should be addressed to our data protection officer at info@airplus-intl.com.



COOKIE POLICY

We use cookies to distinguish you from other users of our web sites, to provide you with a better user experience and to improve our sites. This cookie policy provides you with information about the types of cookies we use and the purposes for using them.

For further information about this policy, please contact info@airplus-intl.com.

What are cookies?

Cookies are small data files that contain a string of characters. Unless you have adjusted your browser setting so that it will refuse cookies, our system will send your device a cookie when you visit our web sites.

Cookies help us to improve our site and to deliver a better and more personalised service, for instance by storing information about your preferences and allowing us to recognise you when you return to our web sites.

You can find more information about cookies at: www.allaboutcookies.org.

Your consent & choices About Cookies

On your first visit to this website you will have seen a pop-up to inform you about the purposes for which cookies are being used and the means to opt-out. Please read this cookie policy carefully for more details about the way we use cookies. Although this pop-up will not usually appear on subsequent visits you may withdraw your cookie consent at any time by following the instructions in this cookies policy.

If you don't want to allow cookies at all, or only want to allow use of certain cookies, you can use your browser settings to withdraw your consent to our use of cookies at any time and also delete cookies that have already been set. These settings are usually found in the 'options' or 'preferences' menu of your internet browser. The website www.allaboutcookies.org contains comprehensive information about the process of opting out on different browsers.

Note that by disabling certain categories of cookies, you may be prevented from accessing some features of our web sites or certain content or functionality may not be available.

If you have queries about our use of cookies, you can contact them at info@airplus-intl.com.

