

## PRIVACY POLICY (Last modified on 2018.05.28)

AMO LABS PTE. LTD. and its affiliates (“**AMO**”, “**we**” or “**us**”) respect the privacy of individuals who visit this website at <https://amo.foundation> and any of our other websites, applications, or services that is linked to this Privacy Policy (collectively, the “**Service**”). This Privacy Policy (the “**Policy**”) sets out how we collect, use, store, disclose, manage, protect and/or process personal data from users of the Service.

### CONSENT

By accessing and/or using the Services, you acknowledge and accept the terms of this Policy and consent to our collection, use and disclosure of your personal data in accordance with the terms of this Policy. If you do not accept the terms of this Policy, please **immediately cease your access and use of this website and/or our Services and do not provide any personal data to us.**

### PRIVACY POLICY

AMO complies with applicable laws and regulations, industry standards and practices. AMO is committed to protecting the interests of its members by establishing this Policy in accordance with relevant laws and regulations.

Unless otherwise defined in this Policy, terms used herein will have the same meaning with those defined in the Terms of Use.

#### 1. PERSONAL DATA COLLECTED AND METHODS OF COLLECTION

1.1 AMO collects your personal data in the following way:

- (a) Collection through voluntary disclosure by the users during service subscription or use or during the user identification process; and
- (b) Automatic collection through the use of our Service.

1.2 “**Personal data**” is data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which an organisation has or is likely to have access. In the course of your access and use of our Service, we collect the following personal data:

- (a) your personal particulars (Common examples include name, gender, date of birth, nationality, country of residence, telephone number, e-mail address, contact address, identity card/passport details, identification number);
- (b) your financial information (e.g. credit card numbers and bank account information);
- (c) your images and/or photograph;
- (d) your ethereum wallet address for receipt of AMO tokens; and
- (e) other information that we are required or authorized to collect under any applicable law to authenticate or identify you, or to verify any data that you have provided.

1.3 **Automated collection.** In the course of your access and use of our Service, certain personal data is automatically collect from you or through the device you use to access our Service, including:

- (a) transactional information based on your activities with us (e.g. services you purchased and content you generated, your device type, identity and other unique identifiers);
- (b) device or software information (e.g. configuration information on your mobile devices, web browsers or other applications or platforms used to access our Service);
- (c) IP addresses, browsing information (e.g. search history), cookie and other browsing-related data in connection to your use of our Service;
- (d) information about your access to and usage of other mobile applications and software through our Service; and
- (e) information about your use of your user account to access into other third party websites, applications or services.

You may disable the automatic collection of certain data. However, certain aspects (or the whole) of our Service may not be available to you if you choose to do so.

- 1.4 We may also collect personal data and information where required or permitted by any applicable law.
- 1.5 We may also collect personal data from you when you submit an enquiry, feedback or email through our websites or other communication channels.
- 1.6 If you provide or allow the collection of personal data of anyone other than yourself, you warrant that you have informed him/her of the purposes for which we require his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes.
- 1.7 We do not collect sensitive personal data (such as ideology, creed, political orientation, criminal record, or medical information) that may infringe on the basic human rights.

## 2. PURPOSE OF COLLECTION AND USE OF PERSONAL DATA

- 2.1 We collect and use the personal data received from you for the purposes listed below.
- 2.2 **Service-related purposes.** We collect and use your personal data for the following purposes of serving you:
  - (a) providing you with the services that you have requested for;
  - (b) authenticating, operating and maintaining your user account;
  - (c) to invite you in creating, developing, operating, providing, improving and promoting our Service, products, and content;
  - (d) to provide you with personalized services based on how you access and use our Service;
  - (e) to send you important notices and announcements such as services-related information, modification to terms, rules and software upgrading; and
  - (f) to respond to your feedback.
- 2.3 **Business purposes.** We may also collect and use your personal data for purposes connected or relevant to our business, as follows:
  - (a) complying with our legal obligations and requirements;
  - (b) enforcing obligations owed to us, and contractual terms and conditions;
  - (c) accounting, risk management and record keeping;
  - (d) carrying out research, planning and statistical analysis;

- (e) to prevent, detect, process and investigate fraudulent or other illegal activities, or mitigate the risk of occurrence of the aforementioned events;
- (f) staff training; and
- (g) any other reasonable purposes related to the aforesaid.

2.4 **Additional purposes.** If you have given your consent to us, we may collect and use your personal data for the following additional purposes.

- (a) inviting you to promote our Service on social media platforms;
- (b) informing you of our latest activities, special offers and promotions;
- (c) informing you of other third party products and/or services that you may be interested in;
- (d) inviting you to participate in polls and questionnaire surveys that may be conducted by us and/or third parties; and
- (e) publicizing your feedback about us and/or our services on our marketing materials (including but not limited to newspapers, social media channels, etc.).

2.5 **Contacting you.** When using your personal data to contact you for the above purposes, we may contact you via regular mail, e-mail, SMS, telephone, push notifications (on your devices) or other means. You may determine the type and manner of information that you will receive from us by adjusting your communication preferences on our Platforms or your device.

### 3. **DISCLOSURE OF PERSONAL DATA**

3.1 **Disclosure to third parties.** We may disclose your personal data to our related entities, affiliates, partners, contractors and associates for the purposes set out in Article 2 above.

3.2 **Disclosure to service providers.** We may disclose your personal data with third parties such as:

- (a) our service providers and data processors that provide services to us (e.g. accounting, hosting and maintenance services, data analytics services, e-mail message services, delivery services, payment transactions services, marketing, etc.); and
- (b) our consultants and professional advisors (e.g. accountants, lawyers, auditors).

3.3 **Disclosure for corporate transactions.** AMO may be engaged in business asset transactions e.g. mergers, acquisitions and transfer of assets. In such circumstances, we may transfer and/or disclose your personal data to facilitate the completion of the transactions.

3.4 We will not disclose any of your personal data to any third parties without first obtaining your consent to do so. However, please note that we may disclose your personal data to third parties without first obtaining your consent in certain situations, including, without limitation, the following:

- (a) cases in which the disclosure is required based on the applicable laws and/or regulations;
- (b) cases in which the purpose of such disclosure is clearly in your interests, and if consent cannot be obtained in a timely way;

- (c) cases in which the disclosure is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
- (d) cases in which there are reasonable grounds to believe that the health or safety of yourself or another individual will be seriously affected and consent for the disclosure of the data cannot be obtained in a timely way, provided that we shall, as soon as may be practicable, notify you of the disclosure and the purposes of the disclosure;
- (e) cases in which the disclosure is necessary for any investigation or proceedings;
- (f) cases in which the personal data is disclosed to any officer of a prescribed law enforcement agency, upon production of written authorisation signed by the head or director of that law enforcement agency or a person of a similar rank, certifying that the personal data is necessary for the purposes of the functions or duties of the officer;
- (g) cases in which the disclosure is to a public agency and such disclosure is necessary in the public interest.

3.5 The instances listed above at Section 3.4 are not intended to be exhaustive. For an exhaustive list of exceptions, you are encouraged to peruse the Second, Third and Fourth Schedules of the Singapore Personal Data Protection Act 2012 which is publicly available at <http://sso.agc.gov.sg>.

3.6 In all other instances of disclosure of personal data to third parties with your express consent, we will endeavour to provide adequate supervision over the handling and administration of your personal data by such third parties, as well as to provide for adequate forms of protection over such personal data.

#### **4. TRANSFER OF PERSONAL DATA OUT OF SINGAPORE**

- 4.1 You acknowledge and consent to our transfer of your personal data to any location outside of Singapore for the purposes set out above.
- 4.2 If we transfer your personal data to a country or territory outside of Singapore, we will ensure that the recipient is obligated to protect your personal data at a standard of protection comparable to the protection under Singapore law, by ensuring that the recipient is either in a jurisdiction with comparable data privacy laws or is legally bound to protect your personal data.

#### **5. RETENTION AND PROTECTION OF PERSONAL DATA**

- 5.1 We will retain your personal data for so long as we need the personal data for our business and legal purposes. We will take appropriate measures to keep your personal data accurate, complete and updated. We will dispose of or delete such information without delay if it is no longer necessary for us to retain your personal data.
- 5.2 Notwithstanding Section 5.1, in order to prevent disputes related to our Service, AMO shall transfer information related to membership and management in a separate database (in the case of information recorded on paper to a separate document) in accordance with our internal policy and keep it for the following period, and use it only within the scope of its purpose.
  - (a) If an investigation is underway for a violation of the relevant laws by a user: Until the end of investigation
  - (b) If there is a debt relationship between AMO and user: Until the settlement of the relevant debt
- 5.3 Notwithstanding the above Section 5.1, AMO shall transfer information related to membership and management in a separate database (in the case of information recorded on paper to a separate document) in accordance with the relevant laws and regulations and keep it for the required period, and use it only within the scope of its purpose.
- 5.4 We will take commercially reasonable efforts to take appropriate precautions and preventive measures to adequately safeguard your personal data to prevent the loss, improper use, or unauthorized disclosure of your personal data. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage and/or alteration of your personal data. However, we cannot be held responsible for any unauthorised safety or security breach by third parties (e.g. hacking) that are wholly attributable to factors beyond our control.
- 5.5 When you use our Service, you may choose to share and upload your personal data to be publicly available to other users. We are not responsible for protecting and may not be able to remove from our Service any personal data that you have made publicly available. Please carefully consider any content that you share, upload, release or communicate through our Service.

## **6. DESTRUCTION OF PERSONAL DATA**

- 6.1 We will take commercially reasonable efforts to ensure that the personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that the (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 6.2 We shall identify personal data that has a reason to be destroyed, and destroy and/or anonymised the personal data with the approval of the data protection officer.

## **7. USERS' RIGHTS**

- 7.1 You may:
- (a) access your personal data through your user account;
  - (b) make corrections to your personal data through your user account;
  - (c) withdraw consent for our use and disclosure of your personal data; and/or
  - (d) choose whether to participate in our personalized promotional scheme and other promotional schemes that we may offer from time to time.
- 7.2 You may exercise the foregoing rights prescribed in Section 7.1 by submitting your request through the means of written communication, mail or fax to the data protection officer of AMO whose contact details are listed below in Section 11 by means of written communication, mail or fax to the data protection officer AMO which contact details are listed below in Section 11.
- 7.3 When you exercise the foregoing rights prescribed in Section 7.1, we shall confirm whether the request is true to the person's intention by requiring a copy of the requesting party's ID.
- 7.4 We may charge you a fee for responding to your requests for access to your personal data about the ways in which we have (or may have) used your personal data. If a fee is to be charged, we will inform you of the amount beforehand and will respond to your request once payment is received.
- 7.5 Where you have requested to withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control, we will process your request within a reasonable time from such a request for withdrawal of consent being made, and will thereafter refrain from collecting, using and/or disclosing your personal data in the manner stated in your request.

## **8. Matters on installation/ Operation and Rejection of Automatic Collection Device of Personal Data**

- 8.1 AMO uses cookies or similar technologies (hereinafter referred to as “cookies”) that store and access from time to time your access information. Cookies are a small amount of information stored on the device when you visit an application and stores information that can be read when you return.
- 8.2 You may exercise the foregoing rights prescribed in Section 7.1 by means of written communication, mail or fax to the data protection officer of AMO.
- (a) maintain your connection session
  - (b) service visit and usage behaviour analysis
  - (c) security access
- 8.3 The installation of cookies is at your absolute discretion. The installation of cookies will be executed pursuant to your browser settings, which may accept all cookies, request consent for installation each time a cookie is saved, or reject installation of all cookies. Please note that if you refuse to install the cookies, you will face inconvenience in using the website and may have difficulty using our Services and/or other services that require login your legal representatives.

## **9. Technological/Administrative Protection Measures of Personal Data**

- 9.1 The personal data processing staff of AMO is limited to the person in charge as assigned by AMO, and a separate password is assigned to that person who has the responsibility of updating that password regularly. Through regular training for the person in charge, we always emphasize compliance with the personal data processing policy.
- 9.2 We have established an internal management plan for the safe processing of personal data.
- 9.3 Your personal data is encrypted and stored and managed. Any important data is encrypted by encrypting the file and transmission data or using the file security function.
- 9.4 We take necessary measures to control access to personal data through the grant, modification and cancellation of access to the database system handling personal data and control unauthorized access from outside by using an intrusion prevention system.

## **10. CHANGES TO POLICY**

We may update and amend the terms of this Policy from time to time and we reserve the right to amend the terms of this Policy at our absolute discretion. The updated Policy will take effect immediately when it is published on our website at <https://amo.foundation>. You are encouraged to visit the aforesaid website from time to time to ensure that you are well informed of our latest privacy policy in relation to personal data protection. The updated Policy will supersede all earlier versions of our privacy policy immediately upon posting. If you do not agree with our updated Policy, please immediately cease your access and use of our Service. You are deemed to have accepted the updated Policy if you continue to access and use our Service after the updated Policy takes effect.

## **11. CONTACT US**

- 11.1 If you have any concerns on how we handle your personal data, wish to make any requests in relation to your personal data, or have any queries in relation to this Policy, please contact the data protection officer of AMO at support@amo.foundation.
- 11.2 If you have any have any complaint or grievance regarding about how we are handling your personal data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or grievance at the contact details in Section 11.1.
- 11.3 Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a personal data protection complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in AMO to handle. For example, you could insert the subject header as “**PDPA Complaint**”.
- 11.4 We will certainly strive to deal with any concerns, complaint or grievance that you may have speedily and fairly.