

Thinla Group Website Privacy Policy

Updated April 2024

THINLA SG PTE. LTD. ("Thinla affiliate" or "we") is committed to protecting the personal information that we collect, use and disclose in the course of providing services, in accordance with all applicable regulatory requirements, including applicable privacy legislation. This privacy policy (the "Privacy Policy") sets out in general terms how we collect, use, disclose and protect the personal information of our customers, other individuals and our website users ("you").

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"Personal Information"

"Personal information" is broadly defined as any information about an identifiable individual. In general, personal information does not include business contact information, including your name, title or position, business or business e-mail address, telephone or facsimile number.

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Accountability

We are responsible under applicable privacy legislation for the personal information in our possession or control. This includes personal information we receive directly, such as from individual customers or other individuals, and personal information we receive indirectly from customers or others. We have established policies and procedures with the objective of protecting personal information and have appointed an Officer to oversee privacy matters for our firm. Our Officer can be reached at support@thinla.com.

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What Personal Information Do We Collect?

The types of personal information we may collect about you include your name and home contact information, billing and account information, information relevant to a customer's use of the services on this website and other information incidental to the provision of services by this site.

Our Purposes for Collecting, Using or Disclosing Personal Information General

We collect, use and disclose personal information for the following purposes:

- to establish and manage client relationships and to perform services;
- to represent clients in the context of business transactions involving the exchange or disclosure of personal information;
- to establish and maintain commercial relationships with clients, suppliers and other third parties, including to issue invoices, administer accounts, collect and process payments, evaluate credit standing, and to fulfil contractual obligations;
- to distribute our publications and invitations to events to individuals who subscribe to our mailing lists;
- to develop and manage our business and operations;
- to detect and protect against error, negligence, breach of contract, fraud, theft and other illegal activity;
- as permitted by, and to comply with, applicable legal or regulatory requirements or provisions;
- to identify products and services which will meet your needs;
- to consolidate and analyze on a non-individualized basis demographic information for our own use or for other party's use in developing marketing platforms and services; and
- to promote to you other products and services offered by us or an affiliate or subsidiary of ours.

You acknowledge and agree to our collection, use and disclosure of personal information for the above purposes.

Publications and Newsletters

Any publications or newsletters use the contact information for those who subscribe through our website or by invitation by us. Our publications and newsletters draw on a contact database of primarily business contacts that may also include individuals. We provide an opportunity to any contact to unsubscribe from our publications program on an ongoing basis.

Website

Cookies - Cookies are small data files that are sent to your browser and stored on your computer's hard-drive when you visit certain websites in order to "track" your

visit to the site. We may, from time to time, collect non-personal information about you and your use of the site through the use of cookies. We do not match or correlate this information with any personal information that you submit on the website. Some browsers can be set to reject all cookies; if you choose to modify your browser in this manner, all features of the web-site will remain available to you. We use cookies for language preference purposes and to analyze web-site usage. This information is used for no other purpose.

Signup and Request for proposal - For the purposes of using our services, visitors may voluntarily submit personal information to us for the purposes of becoming a vendor or supplier of Jumbleberry. We use this personal information you provide only for the purpose for which you have provided it.

Links - Our website may present links to other websites. You should be aware that operators of linked websites may also collect your personal information and information generated through the use of cookies when you link to their websites. We are not responsible for how such third parties collect, use or disclose your personal information, so it is important to review their privacy policies before providing them with your personal information.

Social Media Widgets - Our website includes Social Media Features, such as the Facebook Like button and Twitter button or interactive mini-programs that run on our website. These Features may collect your IP address, which page you are visiting on our website, and may set a cookie to enable the Feature to function properly. Social Media Features and Widgets are either hosted by a third-party or hosted directly on our website. Your interactions with these Features are governed by the privacy policy of the company providing it.

Service Providers

To the extent we enter into arrangements with service providers, agents and contractors to store, handle or process personal information on our behalf, such as for data processing, document storage software support and office services, our policy will be to require such parties by contractual or other means to provide comparable privacy protection while the information is processed or handled by them.

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Testimonials

We may display customer testimonials on our website in addition to other endorsements. With your consent, we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us at support@thinla.com

Consent

We will obtain a customer's consent to the collection, use and disclosure of personal information about the customer, and the consent of other individuals where required by applicable privacy legislation. We assume that an individual has consented to our reasonable collection and use of personal information consistent with the purposes for which the information was given, when the individual initiates contact with us or voluntarily provides personal information to us. We also assume that customers who pay for our services consent to the reasonable collection, use and disclosure of their personal information by our professionals and agents for the conduct of the transactions or proceedings involving our customers. Other than set out herein, we do not collect, use or disclose personal information without consent unless authorized or required by law to do so, such as in the following circumstances:

where a court order or subpoena is issued or a regulatory or other body with jurisdiction to compel production so requires;

when the information is publicly available within the meaning of applicable privacy legislation, such as in professional or other directories, in public registries, publicly-filed court records or information appearing in published form;

if we are required to disclose personal information to a lawful authority;

as otherwise authorized by law.

Limited Collection, Use and Disclosure and Retention

We collect personal information by fair and lawful means and, wherever appropriate, directly from the individual. Wherever possible, we limit the amount of personal information we collect, use or disclose to that necessary and appropriate to provide our services and to operate our business. We limit the personal information we collect and use for customer relationship and for our promotions and to contact information and information about preferences provided by the individual.

We keep records of the work performed and services provided by us in accordance with applicable regulatory requirements and professional standards. These records may include personal information. Our records are stored with safeguards against inappropriate or unauthorized access (see Safeguards). We retain contact information about individuals for the period of time the individual subscribes to our programs, does not opt-out or continues to respond to promotions or other correspondence.

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Accuracy of Information

In order to provide customers or subscribers with a professional level of service and to maintain appropriate contact preferences, we may ask you to update your personal information, contact information or preferences from time to time, and we provide an ongoing opt-out opportunity by contacting the Privacy Officer. Customers are encouraged to contact the Privacy Officer to update the personal information we maintain in our customer files.

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Safeguards

We protect personal information in our files and document management systems from loss, misuse, unauthorized access and alteration by using physically secure facilities, password protection, standard security practices and tools and well-defined internal policies and practices.

We will provide access to such personal information, subject to exceptions stipulated or required by applicable privacy legislation.

If you have any questions or concerns about your privacy and our role in protecting it, please contact our Privacy Officer through the contact information listed above.

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Changes in the Privacy Policy

We reserve the right to change our Privacy Policy at any time by posting a new Privacy Policy on our website.