

Privacy Notice

We at ShopBack respect the privacy and confidentiality of the personal data of our clients, customers, visitors and all others whom we interact with in the course of providing our services. While we are driven by the goal of providing customers with an enhanced shopping experience, we also understand that a key concern that customers may have is the safety of their personal information, and are committed to ensuring that all personal data provided to us remain secure and are only utilised for purposes that our customers have consented to.

To begin with, we only collect such personal information that is necessary to provide you with the services that you have requested, understand your needs, and serve you better as a whole. We collect the least information possible. We provide to our merchant partners only such information as is necessary to allow us to verify and track your rewards.

For example, we utilise cookies to track your transactions with our merchant partners because such information is necessary to enable us to validate and credit cashback into your ShopBack account.

Otherwise, we limit any data provided to an aggregate level.

We do not under any circumstance sell your information.

We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the applicable personal data protection legislation.

Set-out below is our detailed personal data protection policy. You may rest assured that ShopBack takes privacy and security seriously and is receptive to any feedback on these issues. If you have any queries, comments or concerns, or otherwise require any help, please feel free to contact us at help@shopback.com or at dpo@shopback.com.

- The ShopBack Team

Personal Data Protection Policy

The purpose of this document is to inform you as to how ShopBack manages, collects, uses, and discloses Personal Data relating to you and other users of our website, extension for desktop web browsers ("web extension"), software applications, mobile applications and other platforms. We conduct our business in compliance with the relevant data protection legislation, and have implemented additional measures to protect your personal information. The continued provision

of our services to you and your continued use of such services shall be deemed to be our mutual agreement to abide by this Personal Data Protection Policy as updated from time to time on our website.

Personal Data

In this Personal Data Protection Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Collection of Personal Data

The Personal Data that ShopBack may collect from you will depend on the products, services, and promotions that you use or subscribe to. ShopBack collects this data to enable our services and our platforms to function properly and to help us better understand how they work on different devices and browsers. Typically, ShopBack will collect Personal Data relating to you when you:

- Leave your contact details with us after attending our events e.g. marketing or community events and seminars.
- Leave your contact details with us after visiting, using or installing (as the case may be) our websites, portals, mobile applications, social media platforms and browser extensions, or make enquiries via any other portal
- Register for our services and/or submit any forms relating to any of our products and services.
- Sign up for alerts or newsletters or respond to our marketing collaterals e.g. advertisements, brochures or flyers.
- Contact us with enquiries or requests for assistance or interact or communicate with us or our employees, e.g. via our online interface, email, telephone calls, faxes, text messages or face-to-face meetings.
- Participate in competitions, lucky draws, surveys, or other such events.
- Submit your CV and job application forms to us or Submit your CV to recruitment firms or job portals, who in turn forward the same to us.
- Are referenced to us by business partners or third parties.

The Personal Data collected may include information relating to your:

- Identity: This includes your full name, e-mail address, date of birth, phone number, photographs, device ID, IP address, and payment-related information (e.g. bank account details or details of your account with a payment service provider such as PayPal).
- Interactions with us: This includes recordings of your phone calls with us, emails you sent, and other records of any contact you have with us.
- Account: Details relating to your ShopBack account.

- Use of our services: This includes using cookies, our web extension or other browser related methods to track information relating to your interaction with our and our merchants' websites (e.g. the pages within our website that you visit, the time spent on those pages, items and information searched on our site, access time and dates, webpages you were visiting prior to our site, and information relating to clicks and redirects).
- Preferences: This includes details that you have shared with us as to how you would like to be contacted, and your preferred products and brands.
- Location: Some of the services we provide depend on your location. In order to work, those services need to know your location. Whenever you open and use or interact with our platforms (incl. our app) on your mobile device or otherwise, we use the location information to tailor our services to your location. The services use your various devices' 'background location', including to send you notifications of offers / plans / interesting things near you. If you have 'background location' turned on, our platforms will from time to time tell us about your device's location even if you are not directly interacting with our platforms.

Apart from collecting the above Personal Data directly from you or your authorised representatives, ShopBack may also collect Personal Data from third parties (such as our business partners, Google, social media providers, or fraud-prevention agencies), or from publicly available sources.

In addition, ShopBack uses "cookies", which are small data files sent to your browser to store and track information about you when you enter our website. The cookie is used to track some of the information mentioned above relating to the use of our services.

Most internet browsers provide you the option to turn off the processing of cookies but this may result in the loss of functionality, restrict your use of the website, and/or delay or affect the way in which it operates. In particular, it would not allow us to track your transactions with our merchant partners and this would mean that we would be unable to credit you with cashback or otherwise provide you with the products and services that you have requested. That said, you should configure of our web extension and your use thereof.

Accuracy of Information and Third Party Consent

You should ensure that all Personal Data submitted to us is complete, accurate, true, and correct. Failure on your part to do so may result in our inability to provide you with the products and services that you have requested.

Further, when you provide us with any Personal Data relating to a third party (including your spouse, children, parents, and/or employees), you represent to us that you have obtained the consent of the third party to provide us with their Personal Data.

Security of Personal Data

ShopBack ensures that all Personal Data collected will be safely and securely stored and has implemented stringent measures to secure and protect your information. These include:

- Using a secure, encrypted 128-bit SSL connection on all our web pages where you transmit Personal Data. 128-bit SSL encryption is the industry standard and is approximated to take at least one trillion years to crack.
- Ensuring that Personal Data relating to you is only stored on servers with proper safeguards to prevent security breaches.
- Limiting access of information in our systems.
- Implementing strict verification processes to prevent unauthorized access to Personal Data.
- Securely destroying your personal information when it's no longer needed for our business or legal processes.

Use of Personal Data

ShopBack does not sell or trade Personal Data collected online with third parties.

We may use Personal Data relating to you to:

- Administer the services we provide you

Primarily, we use your Personal Data to fulfil and process your orders and cashback. This would include using Personal Data relating to you to track your transactions with our merchant partners, credit cashback rewards into your ShopBack account, and process the necessary payments associated with such transactions. It would also include using Personal Data relating to you to activate or deactivate services, provide you with additional products, services, and benefits (such as promotions, loyalty programmes, or reward programmes), and administer (at times in conjunction with our preferred partners) promotional events, contests, competitions, and corporate social responsibility projects.

- Enhance the services we provide you

We use your Personal Data to investigate complaints, claims and disputes. We also use your Personal Data to improve site and service performance and the delivery of our services, such as when you make inquiries into and provide feedback on our quality of service. We may also use Personal Data relating to you to conduct understand your preferences, develop new products and services, or personalize or otherwise improve the products and services we offer you. It would also include using Personal Data relating to you to deliver relevant advertising (such as that involving details of our or our preferred partners' products, services, special offers, and rewards), either to our customers generally, or which we have identified may be of interest to you in particular, to deliver periodic newsletters to you with your prior consent or if otherwise permitted under local laws and regulations, or to promote benefits and offer rewards and promotions that you qualify for.

- Customer Service

This would include using Personal Data relating to you to respond to requests and enquires made by you (or persons authorised by you), provide you with directory assistance, and provide you with updates relating to our products, services, or policies.

- **Security and Compliance**

This would include using Personal Data relating to you to detect and prevent fraud and other crimes (e.g. by conducting checks against money laundering, terrorism financing and related risks), conducting internal audits, or otherwise meeting legal, regulatory and other requirements (including providing assistance to law enforcement, judicial, and other government agencies, responding to regulatory complaints, making relevant disclosures to regulatory bodies, conducting audit checks, due diligence and investigations, and taking steps which ShopBack considers necessary in the event of a lawsuit or potential lawsuit). It would also include using Personal Data relating to you for the purposes of security and risk management and to ensure the safety and security of our properties and systems.

- **Job applications**

This would include processing job applications, recruitment and selection and processing and administering employment records.

We will not use Personal Data relating to you for purposes other than what we have informed you, or which we are permitted or required under local law and regulations.

We will only retain Personal Data relating to you for only as long as there is a business or legal need.

Sharing of Personal Data

We may share Personal Data relating to you with:

- Companies within the ShopBack group.
- ShopBack's business partners, vendors, agents, and service providers who we work with to deliver services you have subscribed to. This would include merchant partners, payment service providers, third party service providers engaged in connection with marketing promotions and services offered by ShopBack or its preferred partners, and third party service providers who provide operational services to ShopBack (such as telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre or other services to ShopBack). It also includes our professional advisers such as auditors and lawyers.
- In the event of an actual or prospective business asset transaction (such as any merger, acquisition or asset sale), any business partner, investor, assignee, or transferee for the purposes of facilitating such a transaction.
- Relevant regulators, statutory boards or authorities, or law enforcement agencies as required by any laws, rules, guidelines, and regulations or schemes.

Personal Data is disclosed to the above only for relevant purposes (please refer to those mentioned in this Policy) or to protect the interests of our customers.

In exceptional circumstances, ShopBack may also be required to disclose Personal Data relating to you, where there are grounds to believe that disclosure is necessary to prevent a threat to life or health, or for law enforcement purposes.

In some cases, we encrypt, anonymize, and aggregate the information before sharing it. Anonymizing means stripping the information of personally identifiable features. Aggregating means presenting the information in groups or segments eg. age groups.

We will also ensure that overseas organisations we work with observe strict confidentiality and data protection obligations.

Newsletter

When you register as a user on ShopBack, we will also use Personal Data that you have provided to send you promotional e-mails from time to time so as to update you about the latest offers, rewards, deals, products, or services from ShopBack or our preferred partners. You can unsubscribe from our promotional e-mails at any time through the unsubscribe function within the promotional e-mails.

Updating Personal Data

You can update your personal information any time by accessing your account on ShopBack website. If there is any Personal Data relating to you that you are unable to update through the ShopBack website and which you wish to make corrections to, you may contact us at help@shopback.com and we will be glad to help you as best as we can.

Respecting your Consent and Access to Personal Data

If you wish to access the Personal Data that we have relating to you, inquire about the ways in which Personal Data relating to you has been or may have been used or disclosed by Shopback within the past year, or wish to withdraw your consent to our use of such Personal Data, you may contact us (and our Data Protection Officer) at help@shopback.com or dpo@shopback.com. We will seek to attend to your request as best as we reasonably can. Kindly note however that we may have to charge you a reasonable administrative fee for retrieving Personal Data relating to you.

Please note that you may withdraw your consent to our collection, use and disclosure of your information at any time. This includes uninstalling the web extension. However, do kindly also note that if you withdraw your consent to our use and/or disclosure of Personal Data relating to you, depending on the nature of your objection, we may not be in a position to continue to provide our products or services to you or perform on any contract we have with you. Our legal rights and remedies are expressly reserved in such event.

Changes to the Personal Data Protection Policy

ShopBack reserves the right to modify and update the Personal Data Protection Policy at any time to ensure that it is consistent with industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the

Personal Data Protection Policy as updated from time to time on our website. Any changes to this policy will be published on our website.

Governing Law

This Personal Data Protection Policy and your use of this website shall be governed in all respects by the laws of the country which you are in.

Last Updated 9/10/2019