

Simitri Privacy and Cookie Policy

Revised May 25, 2018.

This Privacy and Cookie Policy (the "Policy") becomes effective immediately for unregistered users and users registering accounts or otherwise acknowledging the Policy on or after the revision date. For other users who registered accounts before **May 1, 2018**, it will become effective on **May 30, 2018**, provided that enhanced data protection rights in this Policy required by the EU General Data Protection Regulation (including, without limitation, the "EEA Resident Rights" described in the "Other Important Privacy Information" section) become effective on **May 25, 2018** for all EU-resident users who are natural persons. If you object to the Policy after it becomes effective for you, you may no longer use the Platform.

We, Simitri Group International Pte Ltd, a Singapore company with offices at 541 Orchard Road, #14-01 Liat Tower, Singapore 238881 as the data controller ("Simitri," "we," or "us"), explain in this Policy how we collect, process and/or use information that we receive via our websites, emails we send, and mobile applications (collectively, the "Platform") that link to this Policy, as amended from time to time. This Policy describes how Simitri collects, processes, uses, shares and secures the personal information you provide. It also describes your choices regarding use, access, and correction of your personal information. For purposes of this Policy, personal information shall mean any information relating to an identified or identifiable natural person.

This Policy applies only to information we collect process and use through the Platform. This Policy does not apply to information that we collect through other channels, such as information that we collect offline, from other websites or from emails you send us.

Information We Collect

We collect information about you to provide our services. In order for us to best provide our services to you (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. This means that the data collection is largely necessary for fulfilling the relationship we have with you.

Information You Give Us

When you complete profile, or provide us with other personal information actively, we collect that information for processing and use in accordance with this Policy. Because we change our offerings and features from time to time, the options you have to provide us with personal information also may change, but here are some examples of situations in which you will have the opportunity to provide personal information to us:

- Creating an account;
- Signing up for email alerts;
- Completing a form related to one of our products or services;

- Contacting us for technical support or customer service;

Depending on how you interact with our Platform, the personal information we collect from you may vary. For example, to create an account we may ask only for an email address and password. In other circumstances, such as when you complete a form related to a particular service offering, we may ask you to provide other information, which may include your name, phone number, and/or postal address. We also collect and store certain information associated with actions you take. For example, when you search for articles, we store the titles you click on. We also store information about the time and duration of your activity on our Platform, and other information about your behaviour on our Platform.

On certain Simitri domains, when you set up an individual user account on the Platform, you may create a profile (a "Profile") that will include personal information you provide.

Information We Collect Automatically

When you use the Platform, your device is automatically providing information to us so we can respond and customize our response to you. The type of information we collect by automated means generally includes technical information about your computer, such as your IP address or other device identifier, the type of device you use, and operating system version. The information we collect also may include usage information and statistics about your interaction with the Platform. That information may include the URLs of our web pages that you visited, URLs of referring and exiting pages, page views, time spent on a page, number of clicks, platform type, location data (if you have enabled access to your location on your mobile device), and other information about how you used the Platform.

Automated means of data collection include the following:

Cookies And Tracking Technologies. Technologies such as: cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") are used by Simitri and our partners (such as analytics providers) ("Partners"). We use Cookies to remember users' settings as well as for authentication and analytics. These technologies may be used in analyzing trends, administering the Platform, tracking users' movements around the Platform and to gather demographic information about our user base as a whole. You can control the use of Cookies at the individual browser level, but if you choose to disable Cookies, it may limit your use of certain features or functions on our website or service.

Log File Information. Log file information is automatically reported by your browser or mobile application each time you access a website on our Platform. For example, when you access a Simitri Group International website, our servers automatically record certain information that your web browser sends when you visit any website. These server logs include information such as your web request, Internet Protocol ("IP") address, browser type, referring / exit pages and URLs, number of clicks, domain names, landing pages, and pages viewed.

Device Information. We collect information about the device you use to access the Platform, including type of device, operating system, settings, and unique device identifiers, and IP

address. Whether we collect some or all of this information often depends on what type of device you're using and its settings. For example, different types of information are available depending on whether you're using a Mac or a PC, or an iPhone or Android phone. We collect the device type and any other information you choose to provide, such as username, geolocation, or email address. We also use mobile analytics software to allow us to better understand the functionality of our mobile software on your phone. This software records information such as how often you use the application, the events that occur within the application, aggregated usage, performance data, and where the application was downloaded from. We do not link the information we store within the analytics software to any personally identifiable information you submit within the mobile application.

How We Use Information

We use the information we collect to provide our services. In order for us to best provide our services (and to help make it feasible for us to do so), it is essential that we are able to collect and use the information as described in this Policy. So it is largely necessary for fulfilling the relationship we have with you, and, where that is not the case, we have a legitimate interest in using the information we collect, including personal information, for these purposes:

- to provide you with personalized content, services offered by Simitri as well as content and services (for example, Simitri Group International uses your previous search and browsing history (e.g. articles you click on), or Profile information, to determine relevant search results and provide you with recommended articles or reach out to you about articles you may be interested in; we also use your IP address and mobile device for these purposes);
- to customize and improve the features, performance, and support of the site;
- for internal operations, including troubleshooting, data analysis, testing, research, and service improvement (this includes use of your IP address and mobile device information to help diagnose problems with our service and to administer the Platform);
- to communicate with you;
- to analyse use of the Platform and improve the Platform;
- for other purposes that you separately authorize as you interact with Simitri.

When we collect any information that does not identify you as a specific natural person ("Non-Personal Information"), we are permitted to use and disclose this information for any purpose, notwithstanding anything to the contrary in this Policy, except where we are required to do otherwise by applicable law. Examples of Non-Personal Information include: physical location information; demographic information; or any personal information that has been anonymized, aggregated or de-identified. If we combine any Non-Personal Information with your personal information (such as combining your Country with your name), we will use and disclose such combined information as personal information in accordance with this policy. Similarly, if applicable law requires that we treat certain Non-Personal Information as personal information we will use and disclose this information as personal information in accordance with this policy.

How We Share Information

We only disclose your personal information to third parties as follows:

- We use affiliated and unaffiliated service providers all over the world (including web servers, cloud storage systems, CRM providers, email services, content support teams, and others) to help us deliver our service and run our business subject to strict confidentiality agreements. These companies are authorized to use your personal information only as necessary to provide these services to us;
- We will disclose data if we believe in good faith such disclosure is necessary (1) to comply with relevant laws or to respond to subpoenas or warrants or legal process served on us (though we reserve the right to take action on behalf of our users to defend their right to anonymity when we believe there is a legitimate basis to do so, because candid, lawful, anonymous free speech is fundamental to Simitri's mission of workplace transparency); (2) to enforce Simitri Privacy Policy; (3) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity; (4) as we otherwise deem necessary and is permitted by applicable laws to protect and defend the rights or property of us, the users of our services, or third parties; or (5) as permitted under applicable laws to meet national security and similar requirements;
- In reorganization or sale of our company or assets, your data may be transferred, subject to the acquirer and its affiliates accepting the commitments made in this Policy and compliance with applicable law;
- We will otherwise share personal information with your consent.

Cookie Policy and Ad Choices

This Cookie Policy describes how Simitri Group International Pte Ltd. ("we", "our", "us") uses Cookies and similar technologies. For more information on our general data privacy practices, please see the full Privacy Policy

Cookies

Cookies are small pieces of data that are stored on your computer, mobile phone, or other device when you first visit a page. We use cookies, web beacons, locally shared objects (sometimes called "flash cookies"), mobile identifiers and similar technologies ("Cookies") to help us recognize you on the Platform, enhance your user experience, understand usage of the Platform. Cookies may also be set by other websites or services that run content on the page you're visiting. The provision of your data via Cookies is voluntary except for those Cookies that we place on your device because we need them for the performance of our Platform and our services.

What types of Cookies do we use?

We use two types of Cookies on the Platform: "session cookies" and "persistent cookies." Session Cookies are temporary Cookies that remain on your device until you leave the Platform. A persistent Cookie remains on your device for much longer until you manually delete it (how long the Cookie remains will depend on the duration or "lifetime" of the specific Cookie and your browser settings).

What are Cookies used for?

Cookies transmit information about you and your use of the Platform, such as your browser type, search preferences, article titles that you have clicked on, and the date and time of your use. With the exception of an identifier Cookie that we associate with registered accounts to prevent fraud by members of the Platform, Cookies link to certain unique information such as the articles entered at time of registration or on your profile, but this is not linked to your name.

We use Cookies for things like:

We use Cookies to help us determine whether or not you've signed in to the Platform and to keep you signed in during visits as you access different pages.

Security

We use Cookies to enable and support security features, prevent fraud, and protect your data from unauthorized access.

Preferences and Features

We use Cookies to enable features, help us provide you with personalized content such as showing you your recent search activity.

Analytics and Performance

We use Cookies to analyse how our visitors use the Platform and to monitor site performance. These Cookies help us to identify and fix errors, understand and improve services, research and test out different features, and monitor how our visitors reach our sites.

Article Choices and Managing Cookies

Simitri works with several third parties to provide you with personalized, interest-based articles. If you are redirected to an external link to other web sites, please review privacy policies of those, which may be very different

We may target articles to you, and measure their performance, on and off the Platform using:

- Your use of the Platform (e.g., search history, article clicks);
- Cookies (both on and off the Platform)

How We Work with Third-Party Partners

We work with third parties, such as Google Analytics, to provide analytics services that use the Cookies set on your device to measure the performance and track traffic to Simitri generally. We have also implemented Google Analytics Demographics and Interest Reporting, which categorizes Cookie information so that we can better deliver articles that are relevant and useful to you on the Platform and various websites across the internet.

Opting Out of Cookies

Simitri Cookies. We use Cookies that are necessary for us to provide the services you use and you cannot opt out of these Cookies on the Platform. You are able to disable placement of some (but not all) Cookies by setting your browser to decline cookies, though this may worsen your user experience. Additionally, you can also control, manage and/or delete cookies via your browser settings. A useful resource for information about deleting and controlling cookies can be found at AboutCookies.org.

You may disable location services at any time in your device privacy settings or the Simitri Group International native app settings.

You can opt out of tracking by Google Analytics and Google Analytics Demographics and Interest Reporting services by visiting Google Ads Settings or by downloading the Google Analytics Opt-Out Browser Add-on.

Do Not Track Signals

We do not currently respond to 'do not track' signals and similar settings or mechanisms. When you use the Platform, we try to provide a customized experience.

Other Important Privacy Information

EEA Resident Rights

If you are a resident of the European Economic Area, you have the following data protection rights:

- If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details: contact@simitrigroup.com
- In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us at: contact@simitrigroup.com
- You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you. Registered users can manage their account settings and email marketing preferences as described in the "Choices Regarding Your Personal Information" section below. If you are an unregistered user, or to opt-out of other forms of marketing (such as postal marketing or telemarketing), you may contact us at: contact@simitrigroup.com
- Similarly, if we have collected and processed your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws. Notwithstanding the foregoing, we reserve the right to keep any information in our archives that we deem necessary to comply with our legal obligations, resolve disputes and enforce our agreements.

Choices Regarding Your Personal Information

In addition to your rights outlined above, if you are an individual consumer member of Simitri, you can manage your account settings in the "My Profile" page on the Platform where we provide you with the opportunity to 'opt-out' of having your personal information used for certain purposes

We will send you notifications and if, and to the extent, you have opted-in to communications, or other messages using the contact information (e.g., your email address, your mobile device

identifier) you provided to us when you registered or when you requested information from us. You may opt-out of continuing to receive optional messages by following the instructions included in each message. Also, you can control most of the emails you receive from us by editing your email preferences within "My Profile" settings on the site; provided you will need to separately opt-out of receiving our various blog post update emails by unsubscribing to each blog that you have originally subscribed to. You can control the mobile push notifications within the "Me" section of the mobile app.

We will send you service-related announcements when we believe it is necessary to do so. Generally, you cannot opt-out of these announcements, which are not primarily promotional in nature. If you do not wish to receive these announcements, you have the option to deactivate your account. In some cases, you can stop or limit the information we collect by automated means. To learn more about how you may be able to stop or limit our receipt of that information please review the section entitled Cookie Policy

Close Your Account

If you'd like to close your Simitri account, you can do so within your Account Settings on the Platform. For specific instructions, please contact us at : Contact@simitrigroup.com When you close your account, you will no longer have full access to articles, and any content you have submitted will be pulled from the display on the Platform, but we reserve the right to keep any information in a closed account in our archives that we deem necessary to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements. If, after you close your account, you wish to know which personal information we keep you can proceed in accordance with your rights set out above.

How Long We Keep Your Personal Information

We keep your personal information only so long as we need it to provide the Platform to you and fulfil the purposes described in this Policy. This is also the case for anyone that we share your personal information with and who carries out services on our behalf. Retention periods can vary significantly based on the type of information and how it is used. Our retention periods are based on criteria that include legally mandated retention periods, pending or potential litigation, our intellectual property or ownership rights, contract requirements, operational directives or needs, and historical archiving. When we no longer need to use your personal information and there is no need for us to keep it to comply with our legal or regulatory obligations, resolve disputes and enforce our agreements, we'll either remove it from our systems or depersonalize it so that we can't identify you.

Security Safeguards

Security. We employ physical, electronic, and managerial measures to safeguard the information we collect online. However, no company can fully eliminate security risks, so we cannot make guarantees about any part of our services. You are responsible for keeping your username and password secret. Once you have registered with us, we will never ask you for your password.

Please create a unique password for your Simitri account and do not use it for any other web services or applications. Do not share your password with anyone else.

Privacy of Minors

To access or use the Platform you must be at least 16 years of age or, if older, the age of majority in your jurisdiction, otherwise you may not use the Platform. If you become aware that a child has provided us with personal information without parental consent, please contact us:

Contact@simitrigroup.com. If we become aware that a child has provided us with personal information without parental consent, we remove such information and terminate the child's account.

Data Controller

The information about you that we collect, process and/or use through the Platform is controlled by Simitri Group International Pte Ltd, 541 Orchard Road, #14-01 Liat Tower, Singapore 238881. Simitri Group International and the services it provides are hosted and provided outside of the European Economic Area (EEA), including in the United States, for the purposes described in this policy. The privacy protections and the rights of authorities to access your information in these countries may not be the same as in your home country. We take additional measures when information is transferred from the EEA. This includes having standard clauses approved by the European Commission in our contracts with parties that receive information outside the EEA. We also rely on European Commission adequacy decisions about certain countries, as applicable, for data transfers to countries outside the EEA.

You may reach our data protection officer: contact@simitrigroup.com

Updates to Our Privacy Policy

We may revise this Policy from time to time by posting an updated version on the Platform. This version of the Policy will be effective for you as described at the beginning of the Policy. Further revisions of this Policy will become effective as follows: The revised Policy will be effective immediately for unregistered users and users registering accounts or otherwise acknowledging the Policy on or after the revision date. For other users who registered accounts before the revision date, it will also become effective immediately. However they can object to the new Policy within thirty (30) days after the revision date. If we make a change that we believe materially reduces your rights or increases your responsibilities, we will notify you by email (sent to the email address specified in your account) or by means of a notice on this website prior to the change becoming effective. We may provide notice of changes in other circumstances as well. We encourage you to periodically review this page for the latest information on our privacy practices. Your continued use of the Platform is subject to the most current effective version of this Policy.

Contact Us

If you have any questions or suggestions regarding this Policy, please contact us at:
contact@simitrigroup.com

Simitri Group International Pte Ltd
541 Orchard Road
#14-01 Liat Tower
Singapore 238881