

Privacy Policy - EYEMATCH AI PTE. LTD

At EYEMATCH AI PTE. LTD (“**We**”) we respect the importance of privacy and confidentiality of the personal data of our Clients and others whom we interact with in the course of providing our services. We attract a lot of attention to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data provided, in compliance with the Singapore Personal Data Protection Act (PDPA) 2020 and other applicable laws and regulations. **We would like to point out that you always have the right to access, correct, or delete your photos at any time (whatever your country of residence is), and you can contact us if you have any questions or concerns about our privacy practices.**

§ 1. General provisions

1. This Policy (“**Policy**”) was developed by us to assist you in understanding how we collect, process and protect your Personal Data that is in our possession.
2. Personal Data shall be understood as any information that can uniquely identify an individual person on its own, or when combined with other information (“**Personal Data**”).
3. We apply technical and organizational measures to ensure the protection and security of the processing of Personal Data, appropriate to the risks and categories of data protected (for example we use encryption to secure your photos), and technically and organizationally secure the data against their access to unauthorized persons.
4. In connection with the processing of Personal Data of the Client, We are guided by the following principles:
 - a. **compliance with the law**;
 - b. **reliability and transparency** - which means that Personal Data are processed in a reliable and transparent way for the Client, in particular through the proper implementation of information obligations;
 - c. **data minimization** - which means that the Personal Data of the Client are processed in an adequate, appropriate and limited way to what is necessary for the purposes for which they are processed;
 - d. **limitation of the purpose of data processing** - meaning that Personal Data of the Client are collected for specific, explicit and legitimate purposes and not further processed in a way incompatible with those purposes, whereby further processing for archival purposes in the public interest, for purposes of scientific or historical research or for statistical purposes is not considered incompatible with the original purposes;

- e. **regularity** - which means that the Personal Data of the Client must be correct and, if necessary, updated, thus Personal Data that are incorrect in view of the purposes of their processing are immediately deleted or rectified;
- f. **storage restrictions** - which means that Personal Data of the Client must be stored in a form allowing the identification of the Client for no longer than is necessary for the purposes for which the data are processed, provided that the technical and organizational measures required under the applicable law regulations are implemented to protect the rights and freedoms of the Client and provided that Personal Data may be stored for longer if they are processed solely for archival purposes in the public interest, for purposes of scientific or historical research or for statistical purposes;
- g. **integrity and confidentiality** - which means that Personal Data of the Client must be processed in a manner ensuring their proper security, including protection against unauthorized or unlawful processing and accidental loss, destruction or damage;
- h. **accessibility** - which means that the Client's Personal Data must be protected from destruction, and we ensure that Personal Data is available to authorized persons when they need it or in a timely manner.

§ 2. What kind of Personal Data we collect and why

1. **We collect** your Personal Data from our intermediary who collected it directly from you when you decided to use our service (facial search recognition engine).
2. By using our service, you are accepting the practices outlined in this Policy.
3. The types of Personal Data we may collect about you include: contact information, personal details, e-mail address, your photos.
4. We also collect cookies, sent by the server and stored on your device. By making the appropriate choice on our website, you give your consent to Cookies which may be sometimes considered as Personal Data. You may withdraw this consent at any time by changing your choice, but this will not affect the lawfulness of the processing that took place before you withdraw your consent.
5. The following Cookies are used on the Website:
 - a. cookies necessary for the use of the Website (including session Cookies) - necessary for the use of the services, without which some website functions will not work properly;
 - b. analytical cookies, including those of our partners - used to conduct website performance tests, analyze Website traffic, improve user experience; list of partners: Google Inc. - for more information on the details of what and how Google processes Personal Data, see: <https://policies.google.com/privacy?hl=pl>;

- c. cookies from our advertising partners - for correct display of advertisements on the website, for customisation and personalisation of advertising content, for measuring its effectiveness, for avoiding the same advertisements being displayed too many times; list of partners: Google Inc. - for more information on the details of what and how Google processes, please visit: <https://policies.google.com/privacy?hl=pl>.
6. The processing of the data referred to in paragraph 7 (a-c) does not violate the rights and freedoms of the Clients, as this information is not used for any additional purposes (other than mentioned above). By using this data we are able to manage the correct operation of the Service, adjust the way the content of the Website is displayed and improve the quality of the provision of Services on the Website.
7. **We process** your Personal Data in order to:
 - a. perform the contract you concluded with us through an intermediary;
 - b. answer your contact request;
 - c. respond to law enforcement requests and (as required by applicable law) court order, governmental regulations or to fulfill legal obligations and regulatory requirements.
8. We might also use other kinds of data, including Personal Data such as IP address, browsing history or cookies for our legitimate purpose, such as ensuring security of our service or improving its performance.
9. Your Personal Data may be used by certain **third parties** with whom we cooperate and who help us provide the Service. These entities are service providers such as:
 - a. a hosting provider that stores your data on its server;
 - b. a mailing service provider that stores your contact data (i.e. name or user account login and e-mail address) if you subscribe to a newsletter;
 - c. a payment service provider or payment intermediary that need access to your payment data as well as the type of the Service and billing period you are paying for;
 - d. a legal counsel or attorney that provides legal services to us if we need to share some of your data to ensure those services are accurate and well-based;
 - e. a service provider that provides technical support for our website, if that support includes areas where Personal Data is located, including support for website traffic analysis, ad delivery and personalization, etc. in particular Google Inc. that requires access to the data related to how you use our website to show you personalized ads;
 - f. other subcontractors/service providers, if the subject matter of their business requires access to Personal Data.

10. Your personal data may be transferred outside of your country of residence for the purposes described in this Privacy Notice. In particular, your personal data may be stored on external servers located in other jurisdictions or may be transferred internationally where it is necessary to share your personal data with our related corporations, business units, and third-party service providers.
11. Employees of EYEMATCH AI PTE. LTD may be located in other countries and may access personal data stored in your country for their daily business operations. If employees process data outside of your country of residence, they will do so only with authorized internal IT equipment that adheres strictly to all defined protection and security requirements. All employees undergo necessary training to comply with data protection obligations and to ensure secure data handling.
12. We are committed to protecting your personal data when it is transferred internationally. In such cases, we will take reasonable steps to ensure that your personal data continues to receive a level of protection that is comparable to the standards required by applicable data protection laws. For example, we may enter into contractual agreements or impose binding corporate rules with recipients of your personal data to safeguard it in a manner that is compliant with relevant laws.
13. We do not sell, share or transfer your Personal Data to anyone other than those indicated in this Privacy Policy.

§ 3. The Service

1. The Service (meaning facial recognition search engine) is territorially limited (it is not available everywhere). EYEMATCH AI PTE. LTD does not conclude any facial search recognition contracts in countries or regions (or for residents of those countries or regions) where the use of this type of service is not legally permitted, this includes for example EEA countries, the UK, Argentina or the state of Illinois in the USA. The Service is not intended for use by individuals under the age of 18. If you are under the age of 18, please do not provide any Personal Data to us.
2. EYEMATCH AI PTE. LTD collects publicly available information for the purpose of making it available to individuals who use its services, including the facial recognition search engine. Search results are provided based solely on public internet sources. We do not engage in targeted searches for any particular individual while creating index. What's important, we do not undertake any action that may lead to confirming the identities of the persons depicted in the indexed photos. The data we store does not allow us to identify any person.

§ 4. How we protect your Personal Data

1. As indicated above, we place a high value on the protection of the Personal Data provided to us and ensure that our Clients have never had to worry about the leakage of such data.
2. We use the newest technological solutions to ensure the highest possible quality of Personal Data protection. We apply internal regulations and procedures, which are continually reviewed and audited. What is more, we use software that encrypts Personal Data that provides even better security standards.
3. No matter what country of your residence is, you always have the right to access, correct, or delete your photos at any time. You can exercise these rights by using the contact form provided on our website.
4. The application for the exercise of the Client's right will be fulfilled without undue delay, but not later than one month after its receipt. This deadline may be extended due to the complexity of the request or the number of requests, of which the Client will be informed. As a consequence, until the moment of executing the request, the Client may receive from Collector information, which he has resigned from by withdrawing his consent or expressing his objection.

§ 5. Modifications of the Policy

This Privacy Policy is subject to modification by EYEMATCH AI PTE. LTD at any time. In such cases we will publish an updated version of the Privacy Policy on a given website and notify the Clients of such modifications and the effective date.

§ 6. Additional information for California Residents.

1. This section describes how we collect, use, and disclose personal information under the California Consumer Privacy Act ("CCPA") and, as amended by the California Privacy Rights Act of 2020 (together with the CCPA, "CPRA"). Under some U.S. state laws, including the California Consumer Privacy Act of 2018 (as amended by the California Consumer Privacy Rights Act) (CCPA), residents may have a right to:
 - a) access the categories and specific pieces of Personal Data we have collected, the categories of sources from which the Personal Data is collected, the business purpose(s) for collecting the Personal Data, and the categories of third parties with whom Company has shared Personal Data, and obtain the Personal Data in a portable and, to the extent technically feasible, readily usable format;
 - b) delete Personal Data under certain circumstances;

- c) correct Personal Data under certain circumstances;and
 - d) opt out of the “sale” of Personal Data or “sharing” of Personal Data for targeted advertising purposes. We do not sell your Personal Data in the conventional sense. However, like many companies, we may use advertising and analytics services that are intended to analyze your interactions with our website or app, based on information obtained from cookies or other trackers, including for delivering advertising to you (such as interest-based, targeted, or cross-context behavioral advertising). You can opt out of the use of cookies and other trackers.
2. You can exercise above mentioned rights by contacting us via the contact form available on the Website.
 3. We do not share personal information with third parties for cross-context behavioral advertising.
 4. We receive information that may be considered sensitive under some state laws, such as certain Account Information (e.g., financial information, log-in information). We process sensitive personal information to provide the Service, for product research and development, for authentication, integrity, security, and safety reasons, to communicate with Users, for legal reasons, and with your consent. Company does not use or disclose sensitive personal information (as defined under CCPA) for purposes of inferring characteristics about a consumer, or in any way that would require us to provide a right to limit under the CCPA. Under certain laws, residents may also be permitted to opt out of certain profiling relating to automated processing analyzing certain categories of an individual’s information that would produce a legal or similarly significant effect.
 5. The CPRA prohibits businesses from discriminating against California consumers for exercising any of their rights under the CPRA. This includes us not:
 - a. denying you goods or services;
 - b. charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
 - c. providing you a different level or quality of goods or services;
 - d. suggesting to you that you will receive a different price or rate for goods or services or a different level or quality of goods or services;
 - e. retaliating against you for exercising your privacy rights.
 6. These rights are not absolute, are subject to exceptions and limitations, and may not be afforded to residents of all states. In certain cases, we may decline requests to exercise these rights where permitted by law. We will need to verify your identity to process your access, deletion, and correction requests and reserve the right to confirm your state residency.

7. California Civil Code Section 1798.83, also known as “Shine The Light” law, permits California residents to annually request information regarding the disclosure of your Personal Information (if any) to third parties for the third parties’ direct marketing purposes in the preceding calendar year. We do not share Personal Information with third parties for the third parties’ direct marketing purposes.

§ 7. Additional information for Colorado Residents

1. If you are a resident of Colorado, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Colorado Privacy Act (“CPA”). These rights are listed below:
 - a. right to know and access; you have the right to know and see what Personal Data we have collected about you in a portable format. You may submit a verifiable consumer request up to two times in a twelve - month period for access to your Personal Data;
 - b. right to correct; you have the right to request that we correct inaccurate Personal Data;
 - c. right to delete; you have the right to request that we delete the Personal Data it has collected about you.
 - d. right to Opt Out; you have the right to opt out of targeted advertising, sale of your Personal Data (as defined under Colorado law), the collection and use of Personal Data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
2. To exercise above mentioned privacy rights under Colorado law, please contact us via contact form available on the Website. If you submitted a verifiable consumer request and we have denied your request, you have the right to appeal. If your appeal is denied, you may contact the Colorado Attorney General to submit a complaint.

§ 8. Additional information for Connecticut residents

1. If you are a Connecticut resident, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Connecticut Act Concerning Personal Data Privacy and Online Monitoring (“CTDPA”). These rights are listed below:
 - a. right to know and access; you have the right to know and see what Personal Data we have collected about you in a portable format. You may submit a verifiable consumer request once in a twelve - month period for access to your Personal Data;
 - b. right to correct; you have the right to request that we correct inaccurate Personal Data;

- c. right to delete; you have the right to request that we delete the Personal Data it has collected about you.
 - d. right to Opt Out; you have the right to opt out of targeted advertising, sale of your Personal Data (as defined under Connecticut law), the collection and use of Personal Data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
2. To exercise above mentioned privacy rights under Connecticut law, please contact us via contact form available on the Website. If you submitted a verifiable consumer request and we have denied your request, you have the right to appeal. If your appeal is denied, you may contact the Connecticut General Attorney to submit a complaint.

§ 9. Additional information for Illinois Residents.

1. We do not provide face search services (as described above) in Illinois or for Illinois Residents.
2. Illinois residents can use the opt-out form available on the Website.

§ 10. Additional information for Montana Residents.

1. If you are a Connecticut resident, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Montana Consumer Data Privacy Act (“MTCDPA”). These rights are listed below:
 - a. right to know and access; you have the right to know and see what Personal Data we have collected about you in a portable format. You may submit a verifiable consumer request once in a twelve - month period for access to your Personal Data;
 - b. right to correct; you have the right to request that we correct inaccurate Personal Data;
 - c. right to delete; you have the right to request that we delete the Personal Data it has collected about you.
 - d. right to Opt Out; you have the right to opt out of targeted advertising, sale of your Personal Data (as defined under Montana law), the collection and use of Personal Data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
2. To exercise above mentioned privacy rights under Montana law, please contact us via contact form available on the Website. If you submitted a verifiable consumer request and we have denied your request, you have the right to appeal. If your appeal is denied, you may contact the Montana Attorney General to submit a complaint.

§ 11. Additional information for Oregon Residents.

1. If you are an Oregon resident, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Oregon Consumer Privacy Act (“OCPA”). These rights are listed below:
 - a. right to know and access; you have the right to know and see what Personal Data we have collected about you in a portable format. You may submit a verifiable consumer request once in a twelve - month period for access to your Personal Data;
 - b. right to correct; you have the right to request that we correct inaccurate Personal Data;
 - c. right to delete; you have the right to request that we delete the Personal Data it has collected about you.
 - d. right to Opt Out; you have the right to opt out of targeted advertising, sale of your Personal Data (as defined under Oregon law), the collection and use of Personal Data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.
2. To exercise above mentioned privacy rights under Oregon law, please contact us via contact form available on the Website. If you submitted a verifiable consumer request and we have denied your request, you have the right to appeal. If your appeal is denied, you may contact the Oregon Attorney General to submit a complaint.

§ 12. Additional information for Utah Residents.

1. If you are a Utah resident, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Utah Consumer Privacy Act (“UCPA”). These rights are listed below:
 - a. right to know and access; you have the right to know and see what Personal Data we have collected about you in a portable format. You may submit a verifiable consumer request twice in a twelve - month period for access to your Personal Data;
 - b. right to correct; you have the right to request that we correct inaccurate Personal Data;
 - c. right to delete; you have the right to request that we delete the Personal Data it has collected about you.
 - d. right to Opt Out; you have the right to opt out of targeted advertising, sale of your Personal Data (as defined under Utah law), the collection and use of Personal Data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer.

2. To exercise above mentioned privacy rights under Oregon law, please contact us via contact form available on the Website.

§ 13. Additional information for Virginia Residents.

1. If you are a Virginia resident, this section applies to you. This section, combined with the general Privacy Policy above, describes how we collect, use, and disclose your Personal Data under the Virginia Consumer Data Protection Act (“CDPA”). These rights are listed below:
 - a. right to confirmation of processing and access to Personal Data in portable format; You have the right to confirm whether we are processing your Personal Data and access such Personal Data in a portable format. You may submit a verifiable consumer request up to two times in a twelve - month period for access to your personal data. When you submit an access request, you can request that we deliver the information to you by mail or electronically;
 - b. right to request deletion; If you want us to delete the personal data collected from you, you can send a consumer request requesting that we delete some or all of the information we have collected from you, subject to certain exceptions;
 - c. right to correct; You have the right to request us to correct inaccurate personal information maintained about you.
 - d. right to Opt Out; You have the right to opt out of targeted advertising, sale of your personal data (as defined under Utah law), the collection and use of personal data, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer;
 - e. right to non-discrimination. The CDPA prohibits businesses from discriminating against Virginia consumers for exercising any of their rights under the CDPA. This includes us not:
 - i. denying you goods or services;
 - ii. charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
 - iii. providing you a different level or quality of goods or services;
 - iv. suggesting to you that you will receive a different price or rate for goods or services or a different level or quality of goods or services; and
 - v. retaliating against you for exercising your privacy rights.
2. To exercise above mentioned privacy rights under Virginia law, please contact us via contact form available on the Website. If you submitted a verifiable consumer request and we have

denied your request, you have the right to appeal. If your appeal is denied, you may contact the Virginia Attorney General to submit a complaint.

§ 14. Additional information for Nevada Residents.

1. If you are a Nevada resident, this section applies to you. This section, combined with the general Privacy Policy above, describes your right granted by the Nevada Statute Chapter 603A - Security and Privacy of an individual's data. Nevada residents can use the opt-out form available on the Website to have their data removed from our system.
2. TWe have no intention of selling Personal Data now or in the future.

§ 15. Additional information for Clients from other countries

When specific regulations/legislation apply in a Client's country or region and there is a conflict between these regulations and the provisions of the Policy, the regulations that offer a higher level of protection for Personal Data will apply to the Client who is a resident of that country/region.