

Confidentiality and Privacy Policy for SmooLah Game

This is the Privacy Policy ("Policy") of Singapore Management University ("SMU" or "University").

In this Policy, when we use "we", "us" or "our", we refer to the SMU which is collecting your personal data, or which is operating the website which you are accessing or using.

This Policy applies to all personal data that you may provide to us and the personal data we hold about you. By providing us with your personal data or by accessing, using or viewing the applicable website or any of its services, functions or contents (including transmitting, caching or storing of any such personal data), you shall be deemed to have agreed to each and all the terms, conditions, and notices in this Policy.

If you do not agree, please cease use of the relevant website(s) and/or service(s) and do not provide any personal data to us.

Further, you can access SMU terms of Use policy in the following link <https://www.smu.edu.sg/terms-use> or https://skbi.smu.edu.sg/sites/skbi.smu.edu.sg/files/documents/SmooLah_terms_of_use_web.pdf.

1. Confidentiality and Privacy of Research Data

You will be asked to provide your personal identifiable data in the surveys for the purpose of linking the surveys. Therefore, all data collected will be anonymized first by removing the identifiable details before analysis. Only the scientific research team of this study will have access to these anonymous data and will ensure its confidentiality and privacy even after the study is completed (storage duration according to professional standards and institution's research data management practice/policy, if available, otherwise a storage duration of minimum 3 years is required).

All data collected from the app will be stored using your Participant ID. Once incentive has been paid to you or more than 30 days after you have taken the survey, whichever is earlier, the research team will remove the Participant ID from the data. You will no longer be able to withdraw your data once the ID has been removed from the data. Additionally, the personal identifiable data is collected for the purpose of linking the surveys only. For those who fill in both the surveys, you would be eligible to participate in a lucky draw that will be conducted by the administrators at Citi-SMU FinLit program and your institution and not the research team. The hard copy forms will be kept under lock secured cabinet and data will be password protected. The hard copy forms will be kept for 3 years for any auditing purpose and destroyed thereafter. Any analysis and reports arising out of the study will be only be in aggregated form.

The privacy of the data is of utmost importance to SMU, and its confidentiality and sanctity will be protected in accordance with the law.

General Privacy Policy

1 Information we collect and how we collect it

1.1 When you use our website, any service we provide or in your interaction with us, the personal data we may collect includes:

(a) Data collected directly from you. This may be done through this website, over the phone, by email, or in person when you meet our staff or representatives. The data collected may include, but is not limited to:-

- i. your contact information, including your (first and last) name, (billing and/or delivery) address, birthdate and email address and, optionally, your telephone number. We need your email address and (optionally) telephone number so that we may contact you if we have questions or information for you regarding your order or the service that we are providing or will provide to you;
- ii. other information required to be able to process your order or to provide you with the service, such as information concerning the products you have ordered or the service we are providing to you, the billing and/or delivery address, banking and/or credit card details;
- iii. if you have created an online profile or account, the preferences and interests stored in such profile or account (please see below for further information concerning the profiles); and
- iv. if you have contacted customer service, the details of this contact and the contact history.

(b) Data collected by automated means. Various technologies may be used on our website and our mobile and web-based applications in order to make them more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. Examples of such technologies include:

Clickstream data. A visit to one of our websites results in data that is transmitted from your browser to our server being automatically collected and stored by us or by third parties on behalf of us. This data can include, in particular, the following:

- the visitor's IP address
- the date and time of the visit
- the referral URL (the site from which the visitor has come)
- the pages visited on our website

- information about the browser used (browser type and version, operating system, etc).

Cookies. A number of places on our website and our mobile and web-based applications make use of cookies. These are essentially small text files that are stored on your computer's hard drive or your user device by your web browser. We can use cookies to identify the owner of a user account and to store articles in a shopping basket during the purchasing process. In other words, cookies help to make our website or our (mobile and web-based) applications more user-friendly, more effective and more secure. The cookies usually used by us are so-called "session cookies", which are automatically deleted at the end of the visit to the relevant website. By default, web browsers enable the use of cookies but this function can also be disabled. However, this will result in some services not being available. It is also possible to manually delete cookies after their use via the web browser. More information may be available from your web browser provider.

Flash cookies. A particular form of cookie is the flash cookie. In contrast to normal cookies, these cookies are not created and saved by the web browser but are governed by the Adobe Flash plug-in. These can contain more information than normal cookies and cannot be deleted or disabled via the browser; this is only possible if you follow instructions available from the Adobe Flash Player website. You can also obtain more information about these cookies on that website.

Web beacons and tracking links. Web beacons (also known as pixel tags and clear GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our website or our (mobile) applications. In conjunction with cookies, these are primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites, as well as finding out if an email has been received and opened and to see if there has been any response.

Web analytics. Web analytics is the term given to a method for collecting and assessing the behaviour of visitors to websites and (mobile) applications. This includes the analysis of traffic patterns in order, for example, to determine the frequency of visits to certain parts of a website or (mobile) application, or to find out what information and services our visitors are most interested in. For these purposes, we primarily make use of click-stream data and the other techniques listed above. Web analytics are carried out by Google Analytics and/or other selected parties. You can find out more information about the processing of web analytics data by Google Analytics in paragraph 7 below.

2 How we use the information collected

2.1 We use your personal data for the purposes of serving you. This includes, where applicable:-

providing you with the products and services that you have requested e.g. notifying you regarding the status of your order or delivery, assessment of your creditworthiness (for which we may use third parties);

ensuring that your transactions on our websites are safe and secure;

providing you with a convenient shopping experience;

contacting you for feedback after a sale of a product or service; and

resolving any problems or disputes you may encounter in relation to our products and services.

2.2 We may also use your personal data for purposes connected or relevant to the business of the SMU, such as:-

complying with legal and regulatory obligations and requirements;

enforcing obligations owed to the University;

researching and developing new products and services or improving existing products and services of the University;

accounting, risk management, compliance and record keeping purposes;

carrying out research, planning and statistical analysis; and

staff training.

2.3 Your personal data may also be anonymised for use by the SMU or affiliated researchers for other purposes.

2.4 If you have consented, your personal data may be used by the SMU for the purposes of marketing products and services offered on the website or other products or services offered by the University or those of its strategic partners or business affiliates e.g. informing you of latest activities, special offers, promotions or sending you newsletters.

2.5 In order for us to market products and services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your shopping behaviour in e-shops, your use of loyalty programmes, your ratings and reviews of products, your contact history with our customer service, your newsletter clicks/ opening results, your surfing behaviour (web tracking), the newsletter types you are subscribed to, your participation in promotions or events, your interactions with us and your use of (mobile) applications).

2.6 If you have contacted us with any complaints, feedback, comments, suggestions, we will use and disclose your personal data (including your contact history) to respond to you and provide you with the best service possible. If you are the complainant and you do not want us to disclose your identity to the party you are complaining about, you must let us know immediately. However, it may not always be possible to handle your complaint on the basis of anonymity.

2.7 When using your personal data to contact you for the above purposes, we may contact you via regular mail, fax, e-mail, SMS, telephone or any other electronic means.

2.8 If we need to use your personal data for any other purposes, we will notify you and obtain your consent beforehand. You will be given the opportunity to withhold or withdraw your consent for the use of your personal data for these other purposes.

3 Disclosure of information

3.1 We will not sell your personal data to third parties.

3.2 We will only disclose your personal data to third parties where you have provided us consent, and in the situations expressly set out in this Policy. If you have consented to receiving marketing information from us, our strategic partners and business associates, we will be disclosing your personal data to them.

3.3 Your personal data may be disclosed and shared within the University or affiliated researchers to allow us to provide the products and services which you have requested.

3.4 We may disclose or share your personal data with third parties researchers who provide necessary services to SMU, such as:-

service providers and data processors working on our behalf and providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, solvency check and address check, etc; and our consultants and professional advisers (such as accountants, lawyers, auditors).

3.5 We will also disclose your personal data to third parties in order to comply with legal obligations or industry requirements. This includes disclosures to legal, regulatory, governmental, tax and law enforcement authorities.

3.6 Our website may have the functionalities to allow you to share your personal data with other third parties such as other users of our website. You are responsible for your choice(s) and are deemed to have provided consent for any sharing of your personal data in the manner provided by the website.

3.7 You fully understand and consent that we may transfer your personal data to any location outside of Singapore for the purposes set out in this paragraph 3. When transferring your personal data outside of Singapore we will protect your personal data to a standard comparable to the protection accorded to your personal data under the Singapore Personal Data Protection Act 2012 by ensuring that the recipient is either in a jurisdiction which has comparable data protection laws, or is contractually bound to protect your personal data.

4 Third Parties

4.1 This Policy only applies to our website and information that we collect from you. Our websites may contain links to other websites which are not owned or maintained by us. When visiting these third party websites or disclosing your personal data to third parties (including buyers or sellers on our website), you should read their privacy policies, or ask relevant questions before you disclose your personal data. We are not responsible for the collection, use or disclosure of your personal data by such third parties.

5 Social Networks

5.1 Our website and mobile or web-based applications may provide you with social plugins from various social networks (such as Facebook and Twitter). If you choose to interact with a social network, your activity on our website or via our mobile or web-based applications will also be made available to social networks such as Facebook and Twitter.

5.2 If you are logged in on one of the social networks during the visit of one of our websites or mobile or web-based applications, the social network might add this information to your profile. If you are interacting with one of the social plugins, this information will be transferred to the social network. In case you do not wish such a data transfer, please log off on your social network before you enter one of our websites or mobile or web-based applications.

5.3 We cannot influence this data collection and data transfer via the social plugins. Please read the privacy policies of those social networks for detailed information about the collection and transfer of personal data, what rights you have and how you can achieve satisfactory privacy settings.

6 Geolocation Services

6.1 Our website and mobile or web-based applications may offer location-enabled services, such as Google Maps and Bing Maps. If you use those mobile or web-based applications, they may receive information about your actual location (such as GPS signals sent by a mobile device) or information that can be used to approximate a location. You are always asked if the geolocation service can be activated and you can also object to this geolocation service within the respective mobile or web-based application.

7 Web analytics by Google Analytics

7.1 Our website and mobile or web-based applications may contain web analytic services provided by Google Analytics. This means that when you visit our website or use any mobile or web-based applications, a cookie will be stored on your computer or mobile device, except when your browser settings do not allow for such cookies.

7.2 This further means that when you visit our website or use any mobile or web-based applications, the personal data described above in paragraph 1.1 - including the "clickstream data", the data from "web beacons and tracking links" and information stored in Google Analytics' cookies - will be sent to Google Analytics for analysis for and on behalf of us. Please note that if you have created an online profile at our website or mobile or web-based application and if you are logged on in this profile, a unique number identifying this profile will also be sent to Google Analytics in order to be able to match the web analytics data to this profile.

7.3 Google Analytics acts as our agent, which means that we solely determine the purposes for which the data is being used. You can find out more about the relationships between Google Analytics and us in the Google Analytics' privacy policy.

7.4 If you do not wish information about your behaviour at our website or any mobile or web-based applications being collected and assessed by Google Analytics, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) to not send your site visit information to Google Analytics. The browser add-on is available for most modern browsers. The Google Analytics opt-out browser add-on does not prevent information from being sent to the website itself or in other ways to web analytics services.

8 Retargeting Technologies

8.1 Our website and mobile or web-based applications may use retargeting technologies within the internet. This enables us to show our visitors, who were already interested in our shop and our products, advertisement from us on partner websites.

8.2 We also work with other companies who use tracking technologies to serve advertisements on our behalf across the Internet. These companies may collect non-personally identifiable information about your visits to our websites or mobile or web-based applications and your interaction with our communications, including advertising.

8.3 Retargeting technologies analyse your cookies and display advertisement based on your past surfing behaviour. For further information on cookies, please refer to paragraph 1 of this Policy.

8.4 We do not store any personal data about you with this technology.

9 Minors or less than 18 years of age

9.1 SMU cannot distinguish the age of persons who access and use its websites. If a minor (according to applicable laws) has provided SMU with Customer Data without parental or guardian consent, the parent or guardian should contact SMU to remove the relevant Customer Data and unsubscribe the minor. The email contact for any correspondence is through Citi-SMU financial literacy program for young adults is cs_flya@smu.edu.sg or you can reach out to Principal Investigator Aurobindo Ghosh at aurobindo@smu.edu.sg or +6568280863.

10 Security

10.1 We endeavor to take precautions to ensure that the information you have provided is protected against unauthorised or unintended use, access or disclosure. However, we cannot be held responsible for unauthorised or unintended use, access or disclosure that is beyond our control.

11 Disclaimer

11.1 To the maximum extent permitted by law, we shall not be liable in any event for any special, exemplary, punitive, indirect, incidental or consequential damages of any kind or for any loss of reputation or goodwill, whether based in contract, tort (including negligence), equity, strict liability, statute or otherwise, suffered as a result of unauthorised or unintended use, access or disclosure of your personal data.

12 Changes to this Policy

12.1 We may amend this Policy from time to time. The amended Policy will be published on our website.

13 Your Rights

13.1 If you have any questions about the processing of your personal data or about our Policy, if you do not accept the amended Policy, if you wish to withdraw any consent you have given us at any time, or if you wish to update or have access to your personal data, you are welcome to contact us via support@immxp.com.

13.2 All requests for correction or for access to your personal data must be in writing or email. We will endeavor to respond to your request within 30 days, and if that is not possible, we will inform you of the time by which we will respond to you.

13.3 We may be prevented by law from complying with any request that you may make. We may also decline any request that you may make if the law permits us to do so.

13.4 In many circumstances, we need to use your personal data in order for us to provide you with products or services which you require or have requested. If you do not provide us with the required personal data, or if you do not accept the amended Policy or withdraw your consent to our use and/or disclosure of your personal data for these purposes, it may not be possible for us to continue to serve you or provide you with the products and services that you require or have requested.

13.5 We may charge you a fee for responding to your request for access to the personal data which we hold about you, or for information 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 respond to your request after payment is received.

14 Complaints

14.1 You may send complaints regarding our handling of personal data the following way:-

send an email to cs_fly@smu.edu.sg

provide the name, contact number and address of the person submitting the feedback

provide the relevant details required such as the relevant time period, our employees or who involved, or copies of relevant documents.

14.2 All complaints will be evaluated by SMU in a timely manner. After SMU has completed its evaluation, a duly appointed representative will respond to the person who submitted the complaint or feedback, with the results of the evaluation.

15 Governing Law

15.1 This Policy is governed by the laws of Singapore. You agree to submit to the exclusive jurisdiction of the Courts of Singapore in any dispute relating to this Policy.