

## Data Policy

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This policy describes the information we process to support NextGen Ventures Pte Ltd (“NextGen”) products and services. NextGen products and services are sold and provided through its various platforms and websites under the brand name Pages.SG (collectively “Our Solutions”). In this Policy, “we”, “us”, “our” or “Pages.SG” or “NextGen” refers to NextGen Ventures Pte Ltd, and “you”, “your”, “user” or “users” refers to you as the user, individual or business, of our websites, products or services. By using Our Solutions, you are consenting to our processing and collection of your information as set forth in this Data Policy, as may be amended from time to time.

### 1. What kinds of information do we collect?

To provide Our Solutions, we must process information about you or your business. The types of information we collect depend on how a user uses Our Solutions.

### 2. Things you and others do and provide.

- We collect the content (which includes images, graphics, photographs, videos) and other information you provide when you use Our Solutions, including when you sign up for an account, create, upload, post or share content or communicate with others. This can include information in or about the content you provide (like metadata), such as the location, transaction data, date and time a webpage is accessed. It can also include what you see or use through the features we provide, such as our analyses. Our Solutions automatically process content and communications you and others provide. We may collect this data using cookies. Please see our [Cookie Policy](#) for more information on cookies.
- In Our Solutions, there will be times when you will be given a choice to provide certain types of data, e.g. personal data. If you choose to provide such data, you do so with knowledge that the information could be used in our analyses. This and other information (such as racial or ethnic origin, philosophical beliefs or memberships) could be subject to special protections under the laws of your country.
- We collect information about how you use Our Solutions, such as the types of content you upload, post, view or engage with; the features you use; the actions you take; the people or accounts in Our Solutions you interact with; and the time, frequency and duration of your activities. For example, we log when you're using and have last used Our Solutions, and what you upload and post with regards to the content on Our Solutions. We also collect information about how you use Our Solutions in conjunction with your device' features like the camera or Bluetooth.
- If you use Our Solutions for purchases or financial transactions (such as when you make a purchase in a game or make a donation), we collect information about the purchase or transaction. This includes payment information, such as your credit or debit card number and other card information; other account and authentication information; and billing, shipping and contact details.
- We also receive and analyse content, communications and information that other people provide when they use Our Solutions. This can include information about you, such as when others share or comment on your business or activities.

### **3. Device Information.**

We collect information from and about the devices used to connect and or access Our Solutions. These devices can be computers, mobile phones, tablets and other web-connected devices. For example, we use information collected about your use of Our Solutions on your phone to better personalize the content (including advertisements) or features you see when you use Our Solutions on another device, such as your laptop or tablet, or to measure whether you took an action in response to an advertisement we showed you on your phone on a different device.

Information we obtain from these devices includes:

- **Device attributes.** These are information such as the operating system, hardware and software versions, battery level, signal strength, available storage space, browser type, app and file names and types, and plugins.
- **Device operations.** information about operations and behaviours performed on the device, such as whether a window is foregrounded or backgrounded, or mouse movements (which can help distinguish humans from bots).
- **Identifiers.** Unique identifiers, device IDs, your IP address, and other identifiers, such as from apps or accounts you use in Our Solutions.
- **Device signals.** Bluetooth signals, and information about nearby Wi-Fi access points, beacons, and cell towers.
- **Data from device settings.** Information you allow us to receive through device settings you turn on, such as access to your GPS location, camera or photos.
- **Network and connections.** Information such as the name of your mobile operator or ISP, language, time zone, mobile phone number, IP address, connection speed.

### **4. Information from partners.**

From time to time, advertisers, app developers, and publishers provide information about your activities outside of Our Solutions. These information includes information about your device, websites you visit, purchases you make, the ads you see, and how you use their services, whether or not you have an account with Our Solutions. We also receive information about your online and offline actions and purchases from third-party data providers who have the rights to provide us with your information. Partners receive your data when you visit or use their services or through third parties they work with. We require each of these partners to have lawful rights to collect, use and share your data before providing any data to us.

### **5. How do we use this information?**

We use the information we have (subject to the choices you make) as described below and to provide and support Our Solutions and related services. We strive to collect only personal data which is necessary and adequate but not excessive in relation to the purposes set out below:

- **Provide, personalize and improve Our Solutions.**

We use the information we have to deliver our products and services in Our Solutions, including to personalize features and content so as to improve the user experience. We also use your information for installations and registrations needed as part of Our Solutions

- **Information across Our Solutions and devices.**

We connect information about your activities on Our Solutions to provide a more tailored and consistent experience on Our Solutions you use, wherever you use them.

- **Location-related information.**

We use location-related information, such as your current location, and the businesses and people you are near, to provide, personalize and improve Our Solutions, including ads, to you and others. Location-related information can be based on things like precise device location (if you have allowed us to collect it), IP addresses, and information from your and others' use of Our Solutions.

- **Product and Service Research and Development.**

We use the information we have to develop, test and improve Our Solutions, including by conducting surveys and research, and testing and troubleshooting new products, new services and features.

- **Ads and other Sponsored Content.**

We use the information we have about you, including information about your interests and actions, to select and personalize ads, offers and other sponsored content that we show you, and provide information on donations and contributions for charitable or non-profit making purposes that you may wish to make.

- **Provide Statistics, Analytics, and other Business Services.**

We use the information we have (including your activity outside of Our Solutions, such as the websites visited and ads seen) to help advertisers and other partners measure the effectiveness of their ads and services, and understand the types of people who use their services and how people interact with their websites, apps, and services.

- **Promote Safety, Integrity and Security.**

We use the information we have to verify accounts and activity, combat harmful conduct, detect and prevent spam and other bad experiences, maintain the integrity of Our Solutions, and promote safety and security. For example, we use data we have to investigate suspicious activity or violations of our terms or policies.

- **Communicate with You.**

We use the information we have to send you marketing communications, communicate with you about Our Solutions, and let you know about our policies and terms. We also use your information to respond to you when you contact us.

- **Research and Innovate for Social Good.**

We use the information we have (including from research partners we collaborate with) to conduct and support research and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.

## 6. How is this information shared?

When you consent to providing us with your personal data, we will also ask you for your consent to share your personal data with the third parties set out below in the following ways:

- **People and accounts you share and communicate with.** When you upload, post and communicate using Our Solutions, you choose the audience for what you share. For example, when you post a feedback about a merchant, you choose to share it with them for their use to improve their products or services. Public information can be seen, accessed or downloaded through third-party services such as search engines, APIs, and offline media such as TV, and by apps, websites and other services that integrate with Our Solutions.
- **Apps, websites, and third-party integrations on or using our Products.** When you choose to use third-party apps, websites, or other services that use, or are integrated with Our Solutions, they can receive information about what you upload, post or share.
- **New owner.** If the ownership or control of all or part of Our Solutions or assets changes, we may transfer your information to the new owner.
- **Our Professional Advisers.** We may share your personal data with our professional advisers, including lawyers, bankers, auditors and insurers based in Singapore and other jurisdictions globally, who provide consultancy, banking, legal, insurance and accounting services to us.
- **Sharing with Third-Party Partners.** We work with third-party partners who help us provide and improve Our Solutions or to grow their businesses. We do not sell any of your information to anyone, and we never will. We also impose strict restrictions on how our partners can use and disclose the data we provide. Here are the types of third parties we share information with:
  - **Partners who use our analytics services.** We provide aggregated statistics and insights that help people and businesses understand how people are engaging with Our Products.
  - **Advertisers.** We provide advertisers with reports about the kinds of people seeing their ads and how their ads are performing, but we don't share information that personally identifies you (information such as your name or email address that by itself can be used to contact you or identifies who you are) unless you give us permission.
  - **Measurement Partners.** We share about you and your activities with companies that aggregate it to provide analytics and measurement reports.
  - **Partners Offering Goods and Services in Our Solutions.** When you subscribe to, or buy something from Our Solutions, the content creator or seller can receive your public information and other information you share

with them, as well as the information needed to complete the transaction, including shipping and contact details.

- **Vendors and Service Providers.** We provide information and content to vendors and service providers who support our business, such as by providing technical infrastructure services, analysis on how Our Solutions are used, providing customer service, facilitating payments or conducting surveys.
- **Researchers and Academics.** We also provide information and content to research partners and academics to conduct research that advances scholarship and innovation that support our business or mission, and enhances discovery and innovation on topics of general social welfare, technological advancement, public interest, health and well-being.
- **Law Enforcement or Legal Requests.** We share information with law enforcement or in response to legal requests in the circumstances outlined below (see section 8 below).

When we transfer personal data overseas, we will ensure that the organisations we transfer such data to can provide a standard of protection to such data comparable to the protections accorded under the Personal Data Protection Act 2012 of Singapore.

## 7. Managing your data

Under certain circumstances you have the following rights under data protection laws in relation to your personal data. Note that information that others have shared about you is not part of your account.

- **Request access to your personal data.** You have the right to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it. However, note that when your account is deleted, any data related to your account will not be recoverable.
- **Request correction of your personal data.** You have the right to request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data.** You have the right to request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Generally, in the event where you have decided to not be a part of or use Our Solutions, we will store data related directly to your account until it is no longer reasonably necessary for us to do so. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Object to processing of your personal data.** You have the right to object to processing of your personal data where we are relying on a legitimate interest (or

those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms

- **Request restriction of processing your personal data.** You have the right to request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
  - if you want us to establish the personal data's accuracy;
  - where our use of the personal data is unlawful but you do not want us to erase it;
  - where you need us to hold the personal data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
  - you have objected to our use of your personal data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request transfer of your personal data.** You have the right to request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Right to withdraw consent.** You have the right to withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

## 8. How do we respond to legal requests or prevent harm?

We access, preserve and share your information with regulators, law enforcement or others:

- In response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that the law requires us to do so. This may include responding to legal requests from jurisdictions outside of Singapore when we have a good-faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.
- When we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorized use of Our Solutions, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property, products or services), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm.
- Information we receive about you (including financial transaction data related to purchases made with Our Solutions) can be accessed and preserved for an

extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for terms violations for at least a year to prevent repeat abuse or other term violations.

#### **9. How do we operate and transfer data as part of our services?**

We share information globally, both internally and externally with our partners and with those you connect with around the world in accordance with this policy.

#### **10. Children**

We do not use Our Solutions to knowingly solicit data from or market to children under the age of 18. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should contact our data protection officer, whose contact details are listed in section 13. We will delete such information from our files within a reasonable time.

#### **11. Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve Our Solutions. Please be aware that, although we endeavor to provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches and your personal responsibility is required to safeguard your passwords.

#### **12. How will we notify you of changes to this policy?**

We reserve the right to make changes to this policy at any time. If the alterations constitute a material change to this policy, we will notify you via internet mail according to the preference expressed on your account. What constitutes a "material change" will be determined at our sole discretion, with our discretion to be exercised reasonably and in good faith.

#### **13. Contact**

If you have any questions about how your data is being managed, or if you wish to manage your data in accordance with section 7 above, please contact our data protection officer at [francis@nextgenv.com](mailto:francis@nextgenv.com).

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