

Privacy Policy

Last Updated in September 2019

This Privacy Policy describes how TripAlly Technologies Pte. Ltd. (33 Ubi Avenue, 3 #08-13 Vertex, Singapore 408868) ("**TripAlly**," "**we**," "**us**," "**our**") collects, uses, and shares information about you when you visit and interact on our website (mobile and desktop) and mobile app (collectively, "**Site**") or other means connected to the Sites (such as contacting our customer service team via chat or email).

1. Information We Collect

We collect information about you that you provide to us when using the Site, such as your name, address, phone number, credit card details, e-mail address, location, and your TripAlly account password for service requests. In addition, we may also collect date of birth, nationality and passport details including passport number, country of issue and expiry date.

By visiting our Site, we may also automatically collect certain usage information, such as your IP address, geographic data, country, search preferences related to specific searches, browser, and information about your device's operating system, application version, language settings, and pages that have been shown to you. If you are using a mobile device to access our mobile app or mobile optimized Site, we might also collect information that identifies your mobile device, such as the device ID, location of the device (with your consent), and device-specific settings and characteristics.

If you contact our customer service team or otherwise contact us, by email or other means (such as social media), we will collect information from you in relation to such contact. Where you submit reviews regarding our services or Sites, we will collect information from you included in your reviews, including your first name and country of residence.

In order to provide you with our services, we are required to obtain your device ID and provide this information to one of our vendors who will deliver the services you have requested.

You may decide to participate in our marketing programs or other promotions involving our third-party partners, and doing this will also mean providing us with personal data which we may share with selected third parties who participate in our programs. In addition to that, you can provide us with feedback or ask for help with using the Sites or our various communications platforms.

Telecommunication partners may share information about you with us too – this may happen if you have questions about your pending service request or if disputes arise regarding your service request.

Where required by law, we rely on the following legal bases to process personal information:

- Necessity to Perform Contract with You - we need to process your information in order to provide our international mobile data roaming services to you, answer questions and requests from you, and provide customer support;
- Our Legitimate Interests - we process your information for security and safety; to detect and prevent fraud; to protect and defend the rights or property of others, or our own rights and interests; to customize and provide our a prepaid services to you; and to respond to lawful requests, court orders, and legal process;
- Compliance with Legal Obligations - we need to process your information to comply with relevant laws and regulatory requirements;
- Consent for Direct Marketing Communications and Non-Essential Cookies - we rely on your consent to send direct marketing and to use/ allow non-essential cookies. You can unsubscribe from direct marketing at any time by following the instructions set out in this Privacy Policy; and
- Protect Vital Interest - we may need to process your information in case of emergency involving an individual's life or health.

2. How We Use the Information We Collect

We may use information collected through the Site to:

- Provide you with the requested services, such as creating a user account, processing and confirming your service requested, and communicating with you about services requested;
- Send you email marketing communications about products and services that may be relevant to you;
- Conduct surveys or provide you with information about our services on our Site or on other websites you may visit;
- Maintain and improve the Site, tailor the user experience, and for internal training;
- Protect the security of you and the Site; or
- Exercising a right or obligation conferred or imposed by law, including responding to request and legal demands.

When you make a service request on one of our business partners' websites or apps, we may also receive certain information such as your name and service information, including the service requested, in order to process your request and identify which channel your request has originated from.

During calls with our customer support team, live listening may be done or calls may be recorded for quality and reference purposes which includes the usage of the recordings for the handling of claims, training and fraud detection purposes. If you would prefer that your call was not recorded, you can opt out by stating this, or by hanging up. Call recordings are kept for a limited amount of time and automatically deleted thereafter, unless TripAlly has a legitimate interest to keep such recording for a longer period, including for fraud investigation and legal purposes.

Please note that the confirmation emails and text messages sent after your request are not marketing messages. These messages are part of your service request process. Respectively, they contain information for you to activate your mobile data package, and tools to optionally rate that package after your usage. You will continue to receive them, even if you have opted out of our marketing messages.

Communications on the Site

We offer you various means to communicate about service and existing package, directing the communications through the Site. You can contact us with questions about your request or about your service package via the Site, and via other channels that we may make available.

We may access communications and may use automated systems to review, scan, and analyze communications for security purposes; fraud prevention; compliance with legal and regulatory requirements; investigations of potential misconduct; product development and improvement; research; customer engagement, including to provide you with information and offers that we believe may be of interest to you; and customer or technical support. We reserve the right to block the delivery of or review communications that we, in our sole discretion, believe may contain malicious content, spam, or may pose a risk to you, us, or others. Note, all communications sent or received using the Site's communication tools will be received and stored by us. Business partners through whose platform you made the data usage and telecommunication partners may choose to communicate with you directly via email or other channels that we do not control.

3. Mobile Devices

As part of providing our service to you, we, or our business partners, may send you push notifications with information about your service requested, activation confirmation, package expiration warnings, potential packages, or other messages as part of any TripAlly programs in

which you participate. You may grant us access to your location information or contact details in order to provide services requested by you. When you upload a picture from your mobile device, your picture may also be tagged with your location information. Please read the instructions of your mobile device to understand how to change the settings and enable the sharing of such information or the receipt of push notifications (including Software Development Kit ("SDK") and push token data). Different device operating systems may have different default settings, so please familiarize yourself with such settings governing push notifications.

4. Sharing Your Information

In connection with your visit to our Site and use of our services, we may share your information as follows:

- *Mobile Operator Network* such as the specific operator network that you would like to select and/or third party partners, insurance, and, where available, activity providers, who fulfil your data usage. These operators may contact you as necessary to obtain additional information about you, facilitate your data usage including communicating with you upon your arrival about your connection with selected network, or respond to a review you may submit, all in accordance with their own independent privacy policies.
- *Third Party Service Providers* who provide services to us (for example web hosting), or who otherwise process personal information for purposes such as credit card and payment processing, business analytics, customer service, marketing, or distribution of surveys, to facilitate the delivery of online services and advertising tailored to your interests, and/or fraud prevention. Our third party service providers will only process information as needed to perform their functions. They are not permitted to share or use the information for any other purpose.
- *Business Partners* with whom we may jointly offer products or services, or whose products or services may be offered on our Sites. You can tell when a third-party business partner is involved in a product or service you have requested because their name will appear, either alone or with ours. If you choose to access these optional services, we will on occasion share your personal information with those partners.
- *Our Affiliated Group Companies* - our affiliated (group) companies' employees who have access to this information with our permission and who need to know or have access to this information to perform the service requested by you (including customer services) and internal (audit/compliance) investigations.
- *Where Required or Permitted by Law* - such as to protect ourselves against liability, to respond to subpoenas, judicial processes, legitimate requests, warrants or equivalent by law enforcement officials or authorities, to investigate fraud or other wrongdoing or as otherwise required or necessary in order to comply with applicable law, protect our legitimate interests or to the purchasers in connection with any sale, assignment, or other transfer of all or a part of our business or company. We may also, in compliance with applicable law,

disclose your information to enforce or apply the terms and conditions applicable to our services or to protect the rights, property, or safety of TripAlly, our users, or others.

- *Business Reorganization* - such as part of any sale, assignment or other transfer of our business, or transition of service to another provider. We will ask for your consent if required by applicable law.

We provide appropriate protections for such sharing as required by applicable law to prohibit third parties from using your information for their own purposes, and to address the security and confidentiality of your information. Except as disclosed in this Privacy Policy or as required or permitted by applicable law, we will not disclose your information to third parties without your consent.

5. Country-Specific Privacy Rights

California Privacy Rights

If you are a California resident, you have the right to request information from us about how we may share certain categories of your information with third parties, for the third parties' direct marketing purposes. To exercise this right, please contact us at privacyCA@tripally.com with "**California Privacy Rights**" in the subject line to receive such information.

South Korea Privacy Rights

If you are a South Korean resident, you may request information from us about how we may share certain categories of your information with third parties. TripAlly may provide third parties with your information as set forth below:

Third Party Recipients	Information Collected, Purposes, and Retention
<i>Mobile Network Operators</i>	Process request details (e.g., name, email address, phone number, and credit card number (for TripAllyReception Program participants) in connection with finalizing your request. Please see the section "Data Retention" below for details on how long we may retain your information.

We also entrust the processing of your information as provided below, accompanying such entrustment with contractual safeguards to protect

your information:

Name of Trustee	Entrusted Functions
Data Warehousing Trustee	Hosting databases used to maintain customers' information.
Payment Processing Trustee	Processing customers' credit/debit card information.
Direct Marketing Trustee	Managing TripAlly's direct (e.g., email) marketing program.
Customer Care Trustee	Responding to customers' inquires about TripAlly's Site and services.
Loyalty Program Trustee	Managing TripAlly's customer loyalty program.
Analytics and Interest Based Advertising Trustees	Assessing how customers interact with the Site and third party websites, in order to improve the Site and services and tailor marketing to customers.
Mileage Program Trustee	Managing customers' mileage program participation.

For further information including the name of the third party recipients and trustees that we may share your information with, please contact the TripAlly Data Governance Officer at privacy@tripally.com with "South Korean Privacy Matter" in the subject line to request such further information. You may also contact your local authorities (local numbers provided):

- Privacy Invasion Reporting Center (privacy.kisa.or.kr / dial 118)
- High-Tech Crime Investigation Division, Supreme Prosecutors' Office (www.spo.go.kr / dial 82-2-3480-2337)
- Korean National Police Agency Cyber Bureau (<http://cyberbureau.police.go.kr> / dial 182)

However, please note that as set out in our Terms of Use, TripAlly Technologies Pte. Ltd. in Singapore provides the services to you, and there is currently no entity in South Korea providing a prepaid service to South Korean residents.

We will retain your information for the period necessary to fulfil the purposes outlined in this Privacy Policy and internal company policies. When TripAlly no longer needs to use your information, we will remove your information from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it, unless we need to keep your information to carry out corporate tasks and achieve our business objectives or to comply with applicable legal or regulatory obligations.

China Privacy Notice

If you are a Chinese resident, please note the following regarding the cross-border transfer/sharing of your information.

- Disclosure / Transfer of Information

We will maintain the confidentiality of your information, but may provide or transfer your information to third parties as detailed above under “Sharing Your Information” which may include transferring your information to persons to whom we are required to make disclosures to under applicable law within or outside China.

- Transfer of Information Overseas

We will generally maintain your information on servers in Singapore, or any other data centers or outside the PRC. However, we may transfer your information to third parties mentioned above who may be located outside the China.

Brazil Privacy Notice

Under Brazilian law, we must collect, process and store CPF numbers (tax IDs) of Brazilian nationals or residents if you pay in BRL on our Site. The value of your transaction with us and your CPF number will be shared with our external payment processor for disclosure to the Brazilian Central Bank. We will otherwise retain your CPF number for the duration mentioned in this Privacy Policy and collect and process your information respecting the rules of the Personal Data Protection Law (Brazilian Federal Law No. 13,709/2018). By proceeding with the requested services and accepting our Privacy Policy you express your consent to the treatment of your personal data for the determined purposes.

6. Cookies

Our Site uses and allows third parties to place cookies (session and persistent), pixels/tags, SDKs, application program interfaces ("**APIs**"), and other technologies (collectively, "**Cookies**") on our Site that collect and store certain information about you. Some of these Cookies are necessary to provide, secure, and maintain the Site to you, such as to keep you logged in while your visit our Site, while other Cookies are used to provide you with a better user experience, such as:

- To personalize the Site by remembering information about your activities on the Site (e.g., the language you selected or your log-in

details);

- Perform website analytics, such as impression reporting, demographic reporting and interest reporting to improve our Site and services; and
- To provide you advertising tailored to your interest (see below for details)

Interest Based Advertising

We may also allow certain third parties to place Cookies on our Site in order to collect information about your online activities on our Site (e.g., pages visited on the Site and searches you performed) and over time and across different websites you may visit. This information is used to provide advertising tailored to your interests from us (via email, on our Site, and on other websites) and by third parties on other websites you may visit, also known as interest based advertising, and to analyze the effectiveness of such interest based advertising. We may also share one-way hashed information with third party partners (e.g., Facebook) who may combine hashed information with other identifiers in order to serve custom TripAlly advertisements on other websites or mobile apps based on your prior visits to the Site. TripAlly neither supports nor endorses the goals, causes, or statements of any websites or mobile apps that display our advertisements.

Your Choices

Please review your Internet browser settings, typically under the sections "Help" or "Internet Options," to exercise choices you have for certain Cookies. If you disable or delete certain Cookies in your Internet browser settings, you might not be able to access or use important functions or features of this Site, and you may be required to re-enter your log-in details.

To learn more about certain Cookies used for interest based advertising (including through cross-device tracking) and to exercise certain opt-out choices you may have regarding Cookies, please visit the Digital Advertising Alliance, Network Advertising Initiative, Digital Advertising Alliance-Canada, European Interactive Digital Advertising Alliance or, for our mobile app, by updating your device settings or downloading the AppChoices app.

Please also visit the following third parties' websites to exercise certain opt-out choices over Cookies:

- Google Analytics - <https://tools.google.com/dlpage/gaoptout?hl=en>

- Appsflyer (mobile app analytics) - By emailing appsflyer at: privacy@appsflyer.com
- Baidu - http://www.baidu.com/duty/safe_control.html
- Apple - <https://support.apple.com/en-us/HT202074>
- Facebook - <https://www.facebook.com/ads/settings>
- Google Ads - <https://support.google.com/ads/answer/2662922?hl=en-GB>
- Criteo - <https://www.criteo.com/privacy/>

By exercising such choice regarding interest based advertising, you may still receive advertisements, but the network from which you opted out will no longer deliver ads tailored to your interests. You should also know that logging out of your user account will not actually mean that you opt out of personalized advertisements.

You may need to make such choices on each browser and device you may use to exercise choice regarding certain Cookies. Lastly, at this time the Site is not configured to honor browsers' "Do Not Track" signals.

7. Opting Out of Marketing Communications from Us

You can opt out of receiving marketing communications from us at any time by using the "Unsubscribe" link in each newsletter or communication, or through your TripAlly account (if you've created one) - the email subscriptions settings is under "Profile".

8. International Transfers

In connection with the purposes described above, your information may be stored in locations outside of your home country, which may have different standards of data protection than your home country. We provide appropriate protections for cross-border transfers as required by law for international data transfers, including information transferred to third parties. With respect to such transfers from the European Economic Area ("EEA") to the United States and other non-EEA jurisdictions, we may rely on the EU Model Clauses and/or the need to process your information in order to provide the requested services (performance of a contract) to transfer your information. As permitted by applicable law, you may request details about the suitable safeguards we have in place by contacting us as detailed below. For Chinese residents, please see the details provided above under "*China Privacy Notice*."

9. Information from Other Partners

On occasion, affiliated entities, business partners, or other third party providers may share information with us. One example is if you access or sign in to our Site through social media, such as Facebook Connect, we may collect information from you such as your username, and other information made available to us via such services. In general, your ability to provide such information is through the service provider themselves and you can change those settings in your account settings of the relevant service provider. In general, we may work with our partners to improve and personalize your use of our website in accordance with this policy.

10. Protecting Your Information

We maintain reasonable physical, electronic, and organizational security measures to protect your information against accidental or unlawful destruction or accidental loss, alteration, or unauthorized disclosure or access. We use Secure Socket Layer technology to encrypt credit card information during transit. Through your personal account, you also have the ability to save credit card details for faster future request and payments. Your card details are encrypted and you can always log in to your personal account to delete, edit, or add certain credit card details. For security reasons, the number cannot be edited (but the card details can be deleted). When viewing card details, only the last 4 digits of the number will be visible. Please note that we will store the last 4 digits of your credit card securely upon any requested services made (this is required to manage any refund requests for that service requested).

Data Retention

We will retain your information for the period necessary to fulfill the purposes outlined in this Privacy Policy and internal company policies. When TripAlly no longer needs to use your information, we will – unless we need to keep your information to comply with applicable legal or regulatory obligations or the information is required to carry out corporate tasks and achieve our business objectives – remove it from our systems and records and/or take steps to properly anonymize it so that you can no longer be identified from it.

11. How You Can Access or Change Your Information

You can easily correct your account name, the requesting service holder name (subject to the cancellation policy attached to the request) and contact number at any time by signing in to your account on the website. Alternatively, please contact us via our customer support page or contact us at privacy@tripally.com to exercise any of the following rights:

- *Access:* You are entitled at any time to obtain information about your personal information that we store, in accordance with applicable law and without any fee. However, in exceptional cases we ask you to pay reasonable fees before we provide the information if permitted by applicable law.
- *Rectification:* You may request that we rectify any of your personal information that is incomplete or incorrect.
- *Deletion:* You may request that we delete your account.
- *Restrictions of Processing:* You may ask us to cease processing of your personal information for example if you have objected to the processing and the existence of legitimate grounds is still under consideration.
- *Objection:* You may object, at any time, to your personal information being processed for direct marketing purposes.
- *Right to Revoke Consent:* You have the right to withdraw your consent at any time, without affecting the lawfulness of our processing based on such consent before it was withdrawn.

Data Portability: If applicable, you may request us to send you your personal information, which we store, in a commonly used and machine-readable format which shall be decided at our sole discretion.

To protect your privacy and security, we will verify your identity before responding to such request, and your request will be answered within a reasonable timeframe. We may not be able to allow you to access certain personal information in some cases e.g. if your personal information is connected with personal information of other persons, or for legal reasons. In such cases, we will provide you with an explanation why you cannot obtain this information. We may also deny your request for deletion or rectification of your personal information due to statutory provisions, especially those affecting our accounting processes, processing of claims, for fraud detection or prevention purposes, and mandatory data retention, which may prohibit deletion or anonymization.

12. Updates to Privacy Policy

On occasion, TripAlly may revise this Privacy Policy to reflect changes in the law, our information collection and use practices, the features of our Site, or advances in technology. If we make revisions that change the way we collect or use your information, those changes will be posted in this Privacy Policy and the effective date will be noted at the beginning of this Privacy Policy. Therefore, you should review this Privacy Policy periodically so that you are up to date on our most current policies and practices. TripAlly will also prominently post such material changes prior to implementing the change, and ask for your consent if required by law.

13. Links to Third Party Websites

We may provide links to other websites that are not owned or operated by us ("**Third Party Websites**"). When you use a link online to visit a Third Party Website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked Third Party Website before providing any information on that website.

14. Additional Considerations

A Special Note About Minors

Our Site is not directed to minors under the age of 18.

Language

This Privacy Policy has originally been drawn up in the English language. Translations in other languages may be available for your convenience. In case of conflict between the English language version and a translated version, the English language version shall prevail.

Terms of Use

Please review the TripAlly terms of use for more details on using our Site. This Privacy Policy forms an integral part of our Terms of Use.

15. Contacting Us

If you have any questions about this Privacy Policy or our privacy practices, please contact our TripAlly Data Governance Officer by email at privacy@tripally.com (Singapore, charges apply) or by sending a registered letter to the address at:

TripAlly Technologies Pte. Ltd.

c/o Data Governance Officer

33 Ubi Avenue 3

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