

Privacy Policy

mogu



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MOGU TECHNOLOGIES PTE. LTD.'S PRIVACY POLICY

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About this Privacy Policy

- 1 This is the Privacy Policy for Mogu Technologies Pte. Ltd. ("**Mogu Technologies**"), a company incorporated under the laws of the Republic of Singapore and located at 138 Cecil Street #08-03 Cecil Court Singapore 069538. In this Privacy Policy, "we", "us" or "our" refers to Mogu Technologies.
- 2 We will only use your personal data where you have given us your consent and in the manner set out in this Privacy Policy.
- 3 This Privacy Policy describes how we may collect, use, disclose and process your personal data when you:
 - 3.1 provide us with your personal data, regardless of the medium through which such personal data is provided; and/or
 - 3.2 access or use our website and mobile applications ("**Applications**") and services.
- 4 By providing us with personal data, you agree to the terms of this Privacy Policy and you consent to our collection, use, disclosure and processing of personal data on these terms. DO NOT provide any personal data to us if you do not accept this Privacy Policy.
- 5 This Privacy Policy supplements but does not supersede or replace any other consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data.
- 6 Our Applications may contain links to other websites that are not owned or maintained by us. These links are provided only for your convenience. This Privacy Policy only applies to our Applications. When visiting these third party websites, you should read their privacy policies.

Amendments to this Privacy Policy

- 7 We may amend this Privacy Policy from time to time without notice to you. The current version is available at www.mogutech.io. The updated Privacy Policy will supersede earlier versions and will apply to all personal data provided to us previously.

What personal data we collect

- 8 **What is personal data.** "Personal data" is data that can be used to identify a natural person. Examples of personal data include name, address, contact details, identification numbers, financial information, IP address, transactional information based on your activities on our website and applications, telephone numbers, email address, images, and any other information of a personal nature.
- 9 **Voluntary provision of personal data.** We collect personal data that you voluntarily provide to us. What personal data we collect depends on the purposes for which the personal data is collected and what you have chosen to provide.

You can choose not to provide us with personal data. If you had provided consent, you have the right to withdraw your consent by contacting us in accordance with paragraph 35. However, if you do so, it may not be possible for us to fulfil the purposes for which we require the personal data, including processing your transactions or providing you with the products and services that you require.



- 10 **Providing personal data belonging to others.** In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Privacy Policy.
- 11 **Accuracy and completeness of personal data.** You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.
- 12 **Minors.** If you are a minor under 16 years of age, please obtain consent from your parent or guardian before you submit any personal data to us. If you are a parent or guardian of a minor and you have reason to believe your child or ward has provided us with their personal data without your prior consent, please contact us to request for erasure of their personal data.

How we collect personal data

- 13 **Personal data you provide.** We collect personal data that is relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:
- 13.1 you provide us with your personal data for whatever reasons;
 - 13.2 you authorise us to obtain your personal data from a third party;
 - 13.3 you register your interest for the purpose of being whitelisted as a potential acquirer of the tokens we offer for sale;
 - 13.4 you register for a user account on our Applications;
 - 13.5 you download or use our Applications and services;
 - 13.6 you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, fax and letters;
 - 13.7 you request to be included in an email or our mailing list;
 - 13.8 your images are captured via CCTV cameras while you are within our premises;
 - 13.9 your images are captured via photographs or videos taken by us or our representatives when you attend events organised by us;
 - 13.10 you participate in competitions, contests or games organised by us;
 - 13.11 you attend events or functions organised by us;
 - 13.12 we seek information about you and receive your personal data in connection with your relationship with us, for example, if you are an investor or shareholder of Mogu Technologies; and/or
 - 13.13 you submit an application for employment, internship or secondment, or when you provide documents or information including your resume in connection with any application.



- 14 **Personal data provided by others.** Depending on your relationship with us, we may also collect your personal data from third party sources, for example:
- 14.1 from our business partners such as third parties providing advertising, marketing and promotional services to us;
 - 14.2 from your referees, educational institutions or previous employers (if you have applied to us for a job);
 - 14.3 from your family members or friends who provide your personal data to us on your behalf; and/or
 - 14.4 from public agencies or other public sources.
- 15 **Automated Data Collection Technologies.** Our Applications may contain certain technologies that collect data in the manner described in this Privacy Policy (see below). You should not use our Applications if you do not agree to having your data collected through such means. Alternatively, you should disable these technologies where it is possible to do so.
- 15.1 **Cookies (or browser cookies).** Cookies are small text files which are set by a website or application operator so that your browser or device may be recognised. We may make use of cookies on our Applications to store and track information such as the number of users and their frequency of use, profiles of users and their online preferences. Cookies do not capture information which would personally identify you, but the information collected may be used to assist us in analysing the usage of our Applications and to improve your online experience with us. You can disable the cookies by changing the setting on your browser. However, this may affect the functionality of the Applications.
 - 15.2 **Third Party Use of Cookies and other Tracking Technologies.** Some content or applications on the Applications, including advertisements, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Applications. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.
 - 15.3 **Flash cookies.** Certain features of our Applications may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Applications. 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, disabled, turn off, rejected or opted out via the browser; this is only possible using tools such as the Adobe Flash Player website. You can also obtain more information about these cookies on their website.
 - 15.4 **Web Tracking Beacons and tracking links.** Web beacons (also known as pixel tags and clean 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, our (mobile) applications or our emails to you. 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 e-mail has been received and opened and to see if there has been any response. Web beacons cannot be declined when delivered via a regular web page and mobile application. However, web beacons can be refused when delivered via email. If you do not wish to receive web beacons via email, you will need to disable HTML images or refuse HTML (select Text only) emails via your email software.

- 15.5 **Google 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. The web analytics services on our Applications are provided by Google Analytics. If you do not allow Google Analytics to collect and assess information about your behaviour at our Applications, you can install the Google Analytics opt-out browser add-on.

Google's ability to use and share information collected by Google Analytics about your visits to our Applications is subject to the Google Analytics Terms of Use and Google's Privacy Policy.

Purposes for collection, use or disclosure of your personal data

- 16 **General purposes.** Generally, we collect, use, disclose and process your personal data for purposes connected or relevant to our business. Such purposes would include:

- 16.1 managing your relationship with us;
- 16.2 processing your transactions with us, or to provide products and/or services to you;
- 16.3 facilitating your use of our Applications, and operating, managing, maintaining and improving our Applications;
- 16.4 administrative purposes, including finance, IT and HR purposes, quality assurance and staff training;
- 16.5 managing the safety and security of our premises and event premises (including but not limited to carrying out CCTV surveillance and conducting security clearances);
- 16.6 complying with laws and regulations, internal policies and procedures, including audit, accounting, risk management and record keeping;
- 16.7 complying with international sanctions and applicable regulation for securities and to counter money-laundering or financing of terrorism;
- 16.8 carrying out research and statistical analysis, including development of new products and services or evaluation and improvement of our existing products and services;
- 16.9 resolving any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
- 16.10 assisting you with your enquiries, and to respond to feedback, complaints, disputes and requests;
- 16.11 enforcing legal obligations owed to us, or responding to complaints, litigation or investigations concerning us;
- 16.12 facilitating business asset transactions,



- 16.13 to process your job application and assess your suitability for the position applied for;
- 16.14 such purposes that may be informed to you when your personal data is collected; and/or
- 16.15 any other reasonable purposes related to the aforesaid.
- 17 **Marketing purposes.** If you have provided us with your consent, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates for marketing and communication purposes (e.g. informing you of our latest activities, special offers and promotions). 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 participation in promotions or events and your interactions with us).
- 18 **Additional purposes.** We will only collect, use, disclose and process your personal data for the above purposes and purposes for which you have consented. In certain situations, we may use your personal data for legitimate purposes, which are not incompatible with the original purposes for which you have provided the personal data. If we wish to use your personal data for a purpose unrelated to what you have provided your personal data to us for, we will notify you and seek your consent.
- 19 **Legitimate purposes.** We may collect, use, disclose and process your personal data for legitimate purposes related to our business, for example:
- 19.1 Job seeker/employee: If you are a job seeker, in addition to the specific position which you have applied for, we may disclose your personal data to our related companies for the purposes of offering additional employment opportunities.
- 19.2 Investor/shareholder: If you are an investor or shareholder of Mogu Technologies, we may use your personal data to (a) send you information about Mogu Technologies; (b) manage investor / shareholder relations; and/or (c) comply with regulatory requirements.
- 19.3 Managing our business: We may disclose your personal data to third parties who provide services to us, including our service providers and data processors (providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing, human resources, and professional services) and our consultants and professional advisors (such as accountants, lawyers, auditors).
- 20 **Use permitted under applicable laws.** We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law.
- 21 **Contacting you.** When we contact or send you information for the purposes set out above, we may do so by post, e-mail, SMS, telephone or such other means provided by you. We will only contact you for marketing purposes if we have received your specific consent. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with paragraph 35.

Disclosure of personal data

- 22 We may also disclose your personal data for the above purposes or as required or permitted by law, for example, to:



- 22.1 third party vendors and service providers who are engaged to provide business, support, operational and/ or administrative functions such as auditing, legal, marketing, payment, fulfilment and delivery of orders;
 - 22.2 third parties that we conduct joint marketing and cross promotions with; and/or
 - 22.3 regulatory authorities, statutory bodies or public agencies, including to support their investigations.
- 23 When disclosing personal data to third parties, we will (where appropriate and permissible) enter into contracts with these third parties to protect your personal data in a manner that is consistent with all applicable laws and/or ensure that they only process your personal data in accordance with our instructions.

Transfer of personal data to other countries

- 24 **Transfers.** You fully understand and unambiguously consent that we may transfer your personal data to any country (including to third parties where necessary) for the purposes set out in this Privacy Policy or any other purpose which you have consented to.
- 25 **Safeguards.** We are committed to safeguarding your personal data when it is transferred across jurisdictions. We ensure that your personal data receives an adequate level of protection regardless of the jurisdiction to which it is transferred. We will enter into contracts with recipients to protect your personal data in a manner that is consistent with all applicable laws. You may obtain details of these safeguards by contacting us in accordance with paragraph 35.

Security and Retention of personal data

- 26 **Unauthorised access.** While precautions will be taken to ensure that the personal data you provide is protected against unauthorised or unintended access, we cannot be held responsible for unauthorised or unintended access that is beyond our control.
- 27 **Vulnerabilities.** We do not guarantee that our systems or applications are invulnerable to security breaches, nor do we make any warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.
- 28 **Period of retention.** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. How long we keep your personal data depends on the nature of the data, for example:
- 28.1 we will keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings; and
 - 28.2 personal data collected for use for a limited purpose will generally not be retained for more than one (1) year after completion of the purpose.

Some information may be retained for longer, for example where we are required to do so by law, or need to retain it for the purposes of litigation.

- 29 **Anonymised data.** In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.



Your Rights

- 30 You enjoy certain rights at law in relation to our collection, use, disclosure and processing of your personal data. Such rights include:
- 30.1 **Access:** you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.
 - 30.2 **Correction:** you may request that any incomplete or inaccurate personal data we hold about you is corrected.
 - 30.3 **Withdrawal of consent:** you may withdraw consent for our use of your personal data.
- 31 **Residents of EU.** If you are resident in the European Union, you may also enjoy certain additional rights. These rights are:
- 31.1 **Erasure:** you may ask us to delete or remove personal data that we hold about you in certain circumstances.
 - 31.2 **Restriction:** you may ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.
 - 31.3 **Portability:** you may request the transfer of certain of your personal data to another party under certain conditions.
 - 31.4 **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party) you may object to processing on this ground.
- 32 **Exercising your rights.** If you wish to exercise your rights, you may contact us in accordance with paragraph 35. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law, we may also charge you a fee to process your request.
- 33 **Limitations.** We may be permitted under applicable laws to refuse a request, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.
- 34 **Complaints.** If you are of the opinion that we have not complied with this Privacy Policy or we have infringed applicable data protection laws, you have a right to lodge a complaint with any data protection regulator or authority having jurisdiction over us.

Contacting Us

- 35 **Contact Data Protection Officer.** If you have any feedback or issues in relation to your personal data, or about this Privacy Policy, or wish to make a complaint to us, you may contact our Data Protection Officer at :

Email: dataprotection@mogutech.io

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.



Disclaimer

36 **Disclaimer.** 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.

Governing Law

37 **Governing Law.** This Privacy 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 Privacy Policy.

