

PRIVACY POLICY

Skilleto has developed this Privacy Policy to explain how we may collect, retain, process, share and transfer your Personal Data when you visit our Sites or use our Services. This Privacy Policy applies to your Personal Data when you visit our Sites or use Services, and does not apply to online websites or services that we do not own or control, including websites or services of other Skilleto Users.

We may revise this Privacy Statement from time to time to reflect changes to our business, the Sites or Services, or applicable laws. The revised Privacy Statement will be effective as of the published effective date.

If the revised version includes a substantial change, we will provide you with 30 days prior notice by posting notice of the change on the “Policy Update” page of our website. We may also notify Users of the change using email or other means.

1. OVERVIEW

1.1. This Privacy Policy is designed to help you obtain information about our privacy practices and to help you understand your privacy choices when you use our Sites and Services. Please contact us if you have any questions about our privacy practices that are not addressed in this Privacy Policy.

2. PERSONAL DATA WE COLLECT

2.1. We may collect information about you when you visit our Sites or use our Services, including the following:

2.1.1. Registration information

When you register to use our Services by establishing an Account, we will collect Personal Data as necessary to offer and fulfill the Services you request. Depending on the Services you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account. We may require you to provide us with additional Personal Data as you use our Services.

2.1.2. Transaction and experience information

When you use our Services or access our Sites, for example, to receive money or to process payments, we collect information about the

transaction, as well as other information associated with the transaction such as amount sent or requested, amount paid for products or services, [learner/training provider] information, including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.

2.1.3. Participant information

When you use our Services or access our Sites, we collect Personal Data you provide us about the other participants associated with the transaction.

2.1.4. Information from third-party sources

We obtain information from third-party sources such as merchants, data providers, and credit bureaus, where permitted by law.

2.1.5. Other information we collect

We may collect additional information from or about you when you communicate with us, contact our customer support teams or respond to a survey.

3. RETENTION OF PERSONAL DATA

3.1. We retain Personal Data to fulfil our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and not prohibited by law.

3.2. If your Account is closed, we may take steps to mask Personal Data and other information, but we reserve our ability to retain and access the data for so long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Privacy Statement.

4. PROCESSING OF PERSONAL DATA

4.1. We may process your information for the following reasons:-

- 4.1.1. To operate the Sites and provide the Services, including but not limited to:
 - 4.1.1.1. Authenticate your access to an Account;
 - 4.1.1.2. Communicate with you about your Account, the Sites, the Services, or Skilleto;
 - 4.1.1.3. Create an account connection between your Account and a third-party account or platform; and
 - 4.1.1.4. Perform creditworthiness and other financial standing checks, evaluate applications, and compare information for accuracy and verification purposes.
 - 4.1.1.5. Keep your Account and financial information up to date.
- 4.1.2. To manage our business needs, such as monitoring, analysing, and improving the Services and the Sites' performance and functionality. For example, we analyse User behaviour and perform research about the way you use our Services.
- 4.1.3. To manage risk and protect the Sites, the Services and you from fraud by verifying your identity. Skilleto's risk and fraud tools use Personal Data, Device Information, Technical Usage Data and Geolocation from our Sites and websites that offer the Services to help detect and prevent fraud and abuse of the Services.
- 4.1.4. To comply with our obligations and to enforce the terms of our Sites and Services, including to comply with all applicable laws and regulations.
- 4.1.5. To respond to your requests, for example to contact you about a question you submitted to our customer service team.

5. SHARING OF PERSONAL DATA

- 5.1. We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Privacy Policy.

- 5.2. We may share your Personal Data or other information for the following reasons:
- 5.3. With our parent, subsidiaries and Affiliates,: We may share your Personal Data with our parent, subsidiaries and Affiliates, to, among other things, provide the Services you have requested or authorized; to manage risk; to help detect and prevent potentially illegal and fraudulent acts and other violations of our policies and agreements; and to help us manage the availability and connectivity of Skilleto products, Services, and communications.
- 5.4. With other companies that provide services to us: We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you with Services, verify your identity, assist in processing transactions, send you advertisements for our products and Services, or provide customer support.
- 5.5. With the other parties to transactions when you use the Services, such as other Users, Training Providers, and their service providers: We may share information about you and your account with the other parties involved in processing your transactions. This includes other Users you are sending or receiving funds from, Training Providers, and their service providers when you use the Services to pay for goods or services. The information includes but not limited to:-
- 5.5.1. Personal Data and Account information necessary to facilitate the transaction;
 - 5.5.2. Information to help other participant(s) resolve disputes and detect and prevent fraud; and
 - 5.5.3. Aggregated data and performance analytics to help merchants better understand Users and to help Training Providers enhance Users' experiences.
- 5.6. With other third parties for our business purposes or as permitted or required by law: We may share information about you with other parties for Skilleto's business purposes or as permitted or required by law, including but not limited to:-
- 5.6.1. If we need to do so to comply with a law, legal process or regulations;

- 5.6.2. Law enforcement, regulators, government officials, or other third parties (in Singapore or elsewhere) in relation to a subpoena, court order, or other legal process or requirement under Singapore law or regulation, or the laws and regulations of other jurisdictions that are applicable to Skilleto or one of its subsidiaries or Affiliates; or when we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss; or to report suspected illegal activity or to investigate violations of a user agreement;
 - 5.6.3. To protect our property, Services and legal rights;
 - 5.6.4. To facilitate a purchase or sale of all or part of STE-T&S business;
 - 5.6.5. To help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants;
 - 5.6.6. To credit reporting and collection agencies;
 - 5.6.7. To companies that we plan to merge with or be acquired by; and
 - 5.6.8. To support our audit, compliance, and corporate governance functions.
- 5.7. With public agencies or an organization in the course of acting on behalf of a public agency in relation to the collection, use or disclosure of the personal data which shall include SkillsFuture Singapore and the Lifelong Learning Institute.
- 5.8. With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorize an account connection with a third-party account or platform.
- 5.9. In addition, Skilleto may provide aggregated statistical data to third parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Services. This data will not personally identify you or provide information about your use of the Sites or Services. We do not share your Personal Data with third parties for their marketing purposes without your consent.

6. THIRD PARTY DATA

6.1. You shall not in any event provide information to us about someone else unless you have obtained the prior consent of the other person for us and you to receive and use his or her information. It is your responsibility to ensure that you have obtained prior consent of the other person for us and you to receive and use such information.

7. COOKIES

7.1. When you visit our Sites, use our Services, or visit a third-party website for which we provide online Services, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Services you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Services. Certain aspects and features of our Services and Sites are only available through the use of Cookies, so if you choose to disable or decline Cookies, your use of the Sites and Services may be limited or not possible.

8. PROTECTION OF YOUR PERSONAL DATA

8.1. We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Data against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centres, and information access authorization controls.

8.2. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current. We are not responsible for protecting any Personal Data that we share with a third-party based on an account connection that you have authorized.

9. TRANSFERS OF YOUR PERSONAL DATA TO OTHER COUNTRIES

9.1. Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers.

9.2. We and our third-party service providers store and process your Personal Data in the Republic of Singapore and elsewhere in the world. We will protect your information as described in this Privacy Statement if your Personal Data is transferred to other countries. By using our Sites and Services, you consent to your Personal Data being transferred to other countries, including countries that have different data protection rules than your country. We do not represent that our Sites and Services are appropriate or available in any particular jurisdiction.

10. DEFINITIONS

"Account" or **"Skilleto Account"** means a Personal or Business Skilleto Account.

"Affiliate" means any entity which, directly or indirectly, controls or is controlled by, or is under common control with STE-T&S, where control is (i) the direct or indirect ownership of more than fifty percent of the voting rights in such entity, or (ii) a right to appoint the majority of the directors of the entity.

"Device Information" means data that can be automatically collected from any device used to access the Sites or Services. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the internet connection being used to access the Site or Services; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

"Geolocation Information" means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Services may ask you for permission to share your current location. Some of the Sites and Services require this information to provide a specific product or online Service. If you do not agree to our collection of the geolocation information, our Sites or Services may not function properly when you try to use them.

"Personal Data" has the meaning given to it under the Data Protection Laws.

"Sites" means the websites, mobile apps, official social media platforms, or other online properties through which Skilleto offers the Services and which has posted or linked to this Privacy Policy.

"Skilleto Services" means all our products and services and any other features, technologies and/or functionalities offered by us on our website or through the Software-as-a-Service Training Management System.

"Skilleto," "we," "us" or "our" means ST Engineering Training & Simulation Systems Pte. Ltd.(STE-T&S)

"Substantial Change" means a change to the terms of this Agreement that reduces your rights or increases your responsibilities.

"Technical Usage Data" means information we collect from your phone, computer or other device that you use to access the Sites or Services. Technical Usage Data tells us how you use the Sites and Services, such as what you have searched for and viewed on the Sites and the way you use our Services, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies.

"User" means any person or entity using the Skilleto Services including you.