

PRIVACY NOTICE

Thank you for your interest in our website, Lit.it platform and the products, services and features we make available to you as part of our website, mobile application and Lit.it platform (collectively the “Service”). Protecting user’s data and using it only in the way our visitors/users expect from us is our highest priority. Thus, the following Privacy Notice is designed to inform you about the processing of your personal data and your rights regarding this processing according to applicable data protection laws.

We, LitTech Pte. Ltd. with registered address at 10 Anson Road, #23-05, International Plaza, Singapore (079903), are the controller, meaning that we are the organisation that is legally responsible for deciding how and for what purposes your personal data is used and therefore, responsible for the data processing explained herein.

Our Service may link to other third-party websites and services to make more features available to you. Such third parties may also collect your personal data based on their own privacy notices. For more information about how they collect and use your information, please read their privacy notices respectively.

If you are a resident of the EEA or United Kingdom, please read this Privacy Notice.

If you are a resident of the United States, please read this Privacy Notice.

If you are a resident of a jurisdiction other than the EEA, the United Kingdom or the United States, please read this Privacy Notice. If available, for more information please refer to provisions of a jurisdiction of your residence, which is indicated below.

FOR USERS FROM THE EEA AND UK

Last updated: 17.05.2022

We may collect certain personal data about you. If so, we are subject to the UK General Data Protection Regulation (“**UK GDPR**”) in relation to goods and services we offer to individuals in the UK and are also subject to the EU General Data Protection Regulation (“**EU GDPR**”) if personal data of individuals from the European Economic Area (“**EEA**”) is processed.

We do not provide Service to subjects under 13 years old, subsequently we do not process their personal data. We do not intend nor knowingly collect and process personal data of minors. We rely on the personal data we’ve receive from data subjects (including data as to a user’s age and legal capacity). By using or accessing our Service, you or your parents acknowledge that you are at least 13 years old and have all rights to enter into an agreement with us as to the receipt of Service, as well as you or your parents give us the consent to collect and process your personal data for the purposes, we mention in this Privacy Notice. If you are aware that any personal data of anyone under 13 years of age or without obtaining a parental (or legal guardians) consent of user between 13 and 18 years old (or other age limitation, depending on the jurisdiction) has been shared with or through our Service, please let us know so that we can delete that data.

Should a minor whom we know to be under 13 year old make known to us his or her personal data, we will use that information only to respond directly to a specific request from the minor and will not use to recontact the minor beyond the scope of that request.

We reserve the right to implement any tools and techniques to reveal the human trafficking and exploitation of children and report them immediately to the appropriate state authorities and enforcement agencies, including the personal data associated with the activities which, at our own discretion, are suspicious and may raise concerns about their association with the violation of applicable laws.

This version of our Privacy Notice is primarily written for users above 18 years old, including parents and guardians of child users. If you are under 18 years old you are welcome to read this Privacy Notice if you find it useful, but we advise you discuss the content of this Privacy Notice with your parent or legal guardian. **Data We Collect**

When you use our Service or when you correspond with us by email, phone, through social media, post or otherwise we may collect the following personal information:

- full name, country of residence and email address;
- information to check and verify your identity, e.g., date of birth;
- gender data, if you choose to give this to us;
- whose profile you viewed;
- location data, if you choose to give this to us;
- matters you give us by phone, email, post or via social media;
- account details, such as username and login details, as well as your profile photo;
- technical information about your use of our Service;
- your marketing preferences;
- your responses to surveys, competitions and promotions;
- any other information you disclose to us voluntary.

If you do not provide personal data we ask for where it is indicated to be “required”, we might not be able to provide the Service to you.

Please note that we do not collect personal data that is, by its nature, particularly sensitive. This is genetic data, biometric data, data revealing racial or ethnic origin, information about political opinions, sex life, sexual orientation, religion or other beliefs, data concerning health, criminal background, trade union membership or other sensitive information.

We collect and use this personal data for the purposes described in the “**How and why your data is used**” section below.

Cookies

A cookie is a small text file which is placed onto your device (e.g., computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies some parts of our website and the Service may not be accessible or may not function properly. You can learn more about this and the cookies and other tracking technologies we use by reading our **Cookie Policy**.

How Your Data Is Collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register for an account, contact us, send us feedback or use our Service; and
- indirectly, such as your browsing activity while using our Service. Usually, the information collected indirectly via using the technologies explained in “**Cookies**” section above.

How And Why Your Data Is Used

We process your personal information under the following lawful bases and for the following reasons.

Your consent	We rely on your consent when we use your personal data for optimizing and enhancing the operation of our Service, developing new features and services (including when it is collected as a part to the aggregated data), and providing you with relevant advertising materials as long as it is allowed by your device or browser’s personalization and privacy settings. You have a right to withdraw consent to processing of your personal data. You may enjoy this right at any time you wish. Please remember, that the withdrawal of consent does not mean that the processing before the withdrawal is considered thus illegal. We will do our best to verify your withdrawal of consent within 72 hours since the receipt of your request.
Compliance with our legal obligations	<p>We rely on this ground to identify you and verify your identity or to help prevent and detect fraud against you or us, to protect the security of systems and data, or for disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business (e.g., to record and demonstrate evidence of your consents).</p> <p>All applicable laws depending on the relationship between you and us may affect the scope of personal data we collect, the ways we process your personal data, our ability to keep the confidentiality of your data and avoid their disclosure, duration of the planned retention, etc.</p>
For the performance of a contract with you or to take steps at your request before entering a contract	We may rely on this ground to provide the Service to you, or, if you are already a public figure and public content creator and over the age of 18, (in accordance with our contract with you) to include your name and image in materials to advertise and promote the Service.
To perform a task carried out in the public interest	We may rely on this ground of processing to report to the police or other competent enforcement agencies in case we discover fraud, threats to other users or any other violations of the applicable law or suspicious behaviour or actions committed on behalf of your use of our Service.

<p>For our legitimate interests or those of a third party</p>	<p>We may rely on this ground to create and manage your account with us, to make non-marketing related communications to you, about changes to our terms or policies or changes to the Service or other important notices; to enable or administer our business (quality control, consolidated reporting, customer service), transfer of ownership and so on.</p>
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Please note that when we received your explicit consent, we may run any automated decision-making devices or software including those based on all the data aggregated and may use personal information we collect for profiling. We use it since it delivers such benefits as increased efficiencies and resource savings in providing you with things like customized search results or other features tailored to how you use our Service.

Marketing Communications

Where you have opted in to receive marketing communications from us, we may use your personal data to send you updates by email about our Service, including exclusive offers, promotions or new features. In using your personal data for such marketing purposes, we rely on your consent. This means that we will use your details for marketing purposes only if you have consented to have such communications from us. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at request@lit.it or using the 'unsubscribe' link in emails received from us. If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

Your Rights

We undertake to guarantee the effective exercise of your rights as a data subject. Usually, you can exercise them free of charge. Nonetheless, we retain the right to do so in case we receive an excessive number of repeated requests. These rights are the following:

- The right to receive information about the data processing and a copy of the processed data;
- The right to demand the rectification of inaccurate data or the completion of incomplete data;
- The right to demand the erasure of personal data;
- The right to demand the restriction of the data processing;
- The right to receive the personal data concerning the data subject in a structured, commonly used and machine-readable format and to request the transmittance of these data to another controller;
- The right to object to the data processing;
- The right to withdraw a given consent at any time to stop a data processing that is based on your consent;
- The right to file a complaint with the competent supervisory authority.

To exercise your rights, please contact our Data Protection Officer (see "**Contact us**" section below). When you send us a request to exercise a right, you are asked to specify as far as possible the scope

of the request, the type of right exercised, the personal data processing concerned, and any other useful element, in order to facilitate the examination of your request. In addition, in case of reasonable doubt, you may be asked to prove your identity.

We will do our best to answer you as soon as possible or within a reasonable period taking into account the complexity of the request, but in case we are processing a large number of requests the answer may take us longer than you might expect.

Disclosure Of Your Data

Any information collected and processed by us is treated with the utmost confidentiality. We will make no public release of any personal information that is collected. We ensure we always include the controls and warranties embodied in this Privacy Notice to the contracts and agreements we enter into with our partners and contractors to whom we grant access to your personal data. Once they will have access to your data, they will provide the same equal protection as stated here.

We may be legally obliged to disclose your personal data to the competent state authority, enforcement agency or a court in case we receive a mandatory request for such disclosure from them, including to meet national security or law enforcement requirements and/or to comply with a judicial proceeding, court order, or legal process served on our Service. What is more, we may be proactive and address the competent authority in case we suspect a violation of law to be committed in association with your persona via our Service.

If we are involved in a merger, acquisition, or sale of all or a portion of our assets, you will be notified of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

We routinely share personal data with third parties helping us to run our business, e.g., website hosts (such as Amazon Web Services) and website analytics providers (such as Google Analytics). We use Google Analytics to better understand our audience and users, to improve our marketing campaigns, and to enhance our Service. To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>.

We may also need to share personal data with external auditors, professional advisors (such as lawyers and other advisors), law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; or other parties in connection with a significant corporate transaction or restructuring. Usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

Data Storage

We ensure that the personal data are not retained longer than necessary in relation to the purpose for which they are processed. In order to ensure compliance with this principle, we define the retention periods applicable to each processing operation. The following elements are considered when determining the retention period:

- legal obligations;
- recommendations of supervisory authorities;
- best practices;
- our operational needs.

Different retention periods apply for different types of personal data. Deleting your account will automatically entail deletion of your data, unless its storage is justified by legal obligation or our

legitimate interest to do so. You may solely delete your account under its settings or request a deletion of your account at any time by sending us an email at request@lit.it.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

Data Transfer

It is sometimes necessary for us to share your personal data to countries outside the UK and EEA. In those cases, we will comply with applicable UK and EEA laws designed to ensure the privacy of your personal data.

Under data protection laws, we can only transfer your personal data to a country outside the UK/EEA on the basis of an adequacy regulation or (where such is not available) under legally-approved standard data protection clauses recognised or issued under the applicable data protection laws. In the event we cannot or choose not to continue to rely on either of those mechanisms at any time we will not transfer your personal data outside the UK/EEA unless we can do so on the basis of an alternative mechanism permitted by data protection authorities.

By using our Service, you consent to the transfer of information that we collect about you, including personal information, to any country in which we or our service providers are located. When transferring your personal data, we will do all reasonable measures to verify that an importing entity has all necessary organisational and technical measures to secure your personal data.

Data Protection

The security of your personal information is of great importance to us. We use various kinds of technical, physical, electronic, and administrative security mechanisms that are designed to protect your data from loss, damage, deletion, misuse, unauthorized access, disclosure, or alteration. We also have procedures in place to deal with any suspected data security breach. If there's reason to believe that the data has been unlawfully acquired or accessed e.g., by unauthorized persons, if applicable, you will be notified about such data breach expediently.

How To Complain

Please contact us if you have any query or concern about our use of your information (see below “**Contact us**”).

You also have the right to lodge a complaint with:

- the Information Commissioner in the UK, and
- a relevant data protection supervisory authority in the EEA state of your habitual residence, place of work or of an alleged infringement of data protection laws in the EEA.

The UK’s Information Commissioner may be contacted at <https://ico.org.uk/make-a-complaint> or by telephone: 0303 123 1113.

For a list of EEA data protection supervisory authorities and their contact details see [here](#).

Updates To This Privacy Notice

We may change this Privacy Notice from time to time. If we make significant changes, we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

Contact Us

You can contact us by post or email if you have any questions about this Privacy Notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Name: LitTech Pte. Ltd.

Postal address: 10 Anson Road, #23-05, International Plaza, Singapore (079903)

Email: request@lit.it

Data Protection Officer: Taras Lytovchenko e-mail dpo@lit.it

FOR USERS FROM THE US

Last updated: 17.05.2022

We may collect certain personal data about you. If so, we are subject to the US data protection laws and regulations in relation to goods and services we offer to individuals in the US.

We do not provide Service to subjects under 13 years old, subsequently we do not process their personal data. We do not intend nor knowingly collect and process personal data of minors. We rely on the personal data we've receive from data subjects (including data as to a user's age and legal capacity). By using or accessing our Service, you acknowledge that you are at least 13 years old and have all rights to enter into an agreement with us as to the receipt of Service, as well as you give us the consent to collect and process your personal data for the purposes, we mention in this Privacy Notice. If you are aware that any personal data of anyone under 13 years of age has been shared with or through our Service, please let us know so that we can delete that data.

Should a minor whom we know to be under 13 make known to us his or her personal data, we will use that information only to respond more than once directly to a specific request from the minor and will not use to recontact the minor beyond the scope of that request.

We reserve the right to implement any tools and techniques to reveal the human trafficking and exploitation of children and report them immediately to the appropriate state authorities and enforcement agencies, including the personal data associated with the activities which, at our own discretion, are suspicious and may raise concerns about their association with the violation of applicable laws.

This version of our Privacy Notice is primarily written for users above 18 years old, including parents and guardians of child users. If you are under 18 years old you are welcome to read this Privacy Notice if you find it useful, but we advise you discuss the content of this Privacy Notice with your parent or legal guardian. **Data We Collect**

When you use our Service or when you correspond with us by email, phone, through social media, post or otherwise we may collect the following personal information:

- full name, country of residence and email address;
- information to check and verify your identity, e.g., date of birth;
- location data, if you choose to give this to us;
- gender data, if you choose to give this to us;
- whose profile you viewed;
- matters you give us by phone, email, post or via social media;
- account details, such as username and login details, as well as your profile photo;

- technical information about your use of our Service;
- your marketing preferences;
- your responses to surveys, competitions and promotions; - any other information you disclose to us voluntarily.

If you do not provide personal data we ask for where it is indicated to be 'required', we might not be able to provide the Service to you.

We collect and use this personal data for the purposes described in the "**How and why your data is used**" section below.

Cookies

A cookie is a small text file which is placed onto your device (e.g. computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies some parts of our website and the Service may not be accessible or may not function properly. You can learn more about this and the cookies and other tracking technologies we use by reading our **Cookie Policy**.

How Your Data Is Collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register for an account, contact us, send us feedback or use our Service; and
- indirectly, such as your browsing activity while using our Service. Usually, the information collected indirectly via using the technologies explained in "**Cookies**" section above.

How And Why Your Data Is Used

We use your personal data for the following purposes:

- to create and manage your account with us;
- to provide the Service to you;
- to conduct checks to identify you and verify your identity or to help prevent and detect fraud against you or us;
- to enforce legal rights or defend or undertake legal proceedings;
- to customise our website, application and their content to your particular preferences based on a record of your selected preferences or on your use of our website or the application;
- to retain and evaluate information on your recent visits to our website or application and how you move around different sections thereof for analytics purposes to understand how people use our website or application so that we can make it more intuitive or to check our website or application is working as intended;
- to send you newsletters about company news, offerings, and promotions;

- to make non-marketing related communications to you, about changes to our terms or policies or changes to the Service or other important notices;
- to protect the security of systems and data;
- for statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, Service or other efficiency measures;
- for updating and enhancing user records;
- for disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, e.g., to record and demonstrate evidence of your consents;
- to market our Service to existing and former users;
- external audits and quality checks, e.g., for the audit of our accounts and the security of our Service;
- we may need to share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary.

We use your personal information based on consent you provide to us. You may withdraw your consent by contacting us (see “**Contact us**” below). Please remember that once you withdraw your consent, you might not be able to experience the whole functionality of our Service. However, in some cases we are required to process your personal data as authorised or required by legal obligations applicable to us. In these situations, we will keep processing your personal data as long as it is required.

Marketing Communications

Where you have opted in to receive marketing communications from us, we may use your personal data to send you updates by email about our Service, including exclusive offers, promotions or new features. In using your personal data for such marketing purposes, we rely on your consent. This means that we will use your details for marketing purposes only if you have consented to have such communications from us. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at request@lit.it or using the ‘unsubscribe’ link in emails received from us. If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

Your Rights

By using our Service, we provide you with the following basic rights:

- access to and update the personal information you have provided us with through any means (e.g., via your account, email, phone);
- delete the personal information you have provided us with through any means (e.g., via your account, email, phone).

Please remember that you may also change or limit advertising identifiers in your device through mobile privacy settings without our intervention in such actions.

Disclosure Of Your Data

Any information collected and processed by us is treated with the utmost confidentiality. We will make no public release of any personal information that is collected. We ensure we always include the controls and warranties embodied in this Privacy Policy to the contracts and agreements we enter into with our partners and contractors to whom we grant access to your personal data. Once they will have access to your data, they will provide the same equal protection as stated here.

We may be legally obliged to disclose your personal data to the competent state authority, enforcement agency or a court in case we receive a mandatory request for such disclosure from them, including to meet national security or law enforcement requirements and/or to comply with a judicial proceeding, court order, or legal process served on our Service. What is more, we may be proactive and address the competent authority in case we suspect a violation of law to be committed in association with your persona via our Service.

If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

We routinely share personal data with third parties helping us to run our business, e.g., website hosts (such as Amazon Web Services) and website analytics providers (such as Google Analytics). We use Google Analytics to better understand our audience and users, to improve our marketing campaigns, and to enhance our Service. To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>.

We may also need to share personal data with external auditors, professional advisors (such as lawyers and other advisors), law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; or other parties in connection with a significant corporate transaction or restructuring. Usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

Data Storage

We ensure that the personal data are not retained longer than necessary in relation to the purpose for which they are processed. In order to ensure compliance with this principle, we define the retention periods applicable to each processing operation. The following elements are considered when determining the retention period:

- Legal obligations;
- Recommendations of supervisory authorities;
- Best practices;
- Our operational needs.

Different retention periods apply for different types of personal data. Deleting your account will automatically entail deletion of your data unless its storage is justified by legal obligation or our legitimate interest to do so. You may solely delete your account under its settings or request a deletion of your account at any time by sending us an email at request@lit.it.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

Data Transfer

By using our Service, you consent to the transfer of information that we collect about you, including personal information, to any country in which we or our service providers are located. When

transferring your personal data, we will do all reasonable measures to verify that an importing entity has all necessary organisational and technical measures to secure your personal data.

Data Protection

The security of your personal information is of great importance to us. We use various kinds of technical, physical, electronic, and administrative security mechanisms that are designed to protect your data from loss, damage, deletion, misuse, unauthorized access, disclosure, or alteration. We also have procedures in place to deal with any suspected data security breach. If there's reason to believe that the data has been unlawfully acquired or accessed e.g., by unauthorized persons, if applicable, you will be notified about such data breach expediently.

We make every effort to protect entrusted data against unauthorized access. We limit access to your personal data to those who have a genuine business need to access it. The procedures applied, such as a comprehensive access authorization system and technical security measures, are regularly reviewed and adapted to technical progress. If there's reason to believe that the data has been unlawfully acquired or accessed e.g., by unauthorized persons, you will be notified about such data breach expediently where we are legally required to do so. Together with other best worldwide practices, we also follow all requirements established by the Stop Hacks and Improve Electronic Data Security (SHIELD) Act, and thus comply with this law.

Updates To This Privacy Notice

We may change this Privacy Notice from time to time. When we make significant changes, we will take steps to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

Contact Us

You can contact us by post or email if you have any questions about this Privacy Notice or the information we hold about you, to exercise a right under data protection law or to make a complaint.

Our contact details are shown below:

Name: LitTech Pte. Ltd.

Postal address: 10 Anson Road, #23-05, International Plaza, Singapore (079903) **Email:** request@lit.it

Notice For California Residents

If you are a California resident, provisions of the Privacy Notice for users from the US will apply to you subject to several additional things you need to know about processing of your personal data pursuant to California Consumer Privacy Act ("CCPA"), which went into effect on January 1, 2020.

Your Rights

Under CCPA, you have the following rights regarding your personal information:

Right to know what personal information we collect about you and the purposes of that collection, as well as know how your personal information is used: you have the right to know what personal information about you we collect, the sources from which it is collected, and the purposes for which we collect it.

Right to know with whom we share your personal information: you have the right to know whether we share your personal data with any third parties. We may share your personal information with third parties who help us to run our business.

Right to know whether any of your personal information is sold: we do not sell or rent out your personal information.

Right to access, request, and receive personal information: you have the right to request which personal data was collected about you and receive a copy of such information. We will disclose and deliver the required information to you in the manner described in the CCPA after receiving a verifiable request from you.

Right to “Opt-Out of Sale” of your personal data: we do not sell your personal data to third parties and do not offer an “opt-out” mechanism.

Right to request deletion of your personal data: you have the right to request deletion of your data from our systems to the extent provided by the CCPA.

We will not discriminate you for exercising any of your CCPA rights. Please contact us if you have any further questions regarding your rights under the CCPA. This should be a verifiable consumer request related to your personal information. The verifiable consumer request must provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. All requests must be labelled “California Resident Request” on the email subject line.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor’s identity or authority to make the request. We will reply within 45 days of request receipt. If we need more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically.

When we sell your information and your right to opt out

Our sharing of information with certain third-parties may be considered a “sale” under the CCPA. In case of selling your information, under the CCPA you have a right to tell us to stop sharing certain information with such third parties. If you wish to opt out of sharing your information, please visit “**Do Not Sell My Personal Information**” or <http://optout.aboutads.info/> and follow the opt out instructions for each of your browsers and devices. Note that any choice you make here will only affect this browser and device.

If we sell the personal information of a child that we know to be under the age of 16 but at least 13 years old, we will get affirmative authorization (“opt-in”) for the sale. Please note that we do not sell information of minors under 13 years old.

FOR USERS FROM JURISDICTIONS OTHER THAN US, UK AND EEA

Last updated: 17.05.2022

We collect, use and are responsible for certain personal data about you. Given the nature of our Service, we do not expect to collect the personal data of anyone under 13 years of age. In certain cases, this age may be higher because of legal requirements established in your jurisdiction. Please read the Privacy Notice for specific jurisdiction applicable to you to have more information on relevant age restrictions. In any case if you are aware that we process personal data of minors without having their parent’s or legal guardian’s consent, when applicable, let us know so that we can delete that data.

By using or accessing our Service you give us the consent to collect and process your personal data for the purposes, we mention in this Privacy Notice.

Data We Collect

When you use our Service or when you correspond with us by email, phone, through social media, post or otherwise we may collect the following personal information:

- full name, country of residence and email address;
- information to check and verify your identity, e.g., date of birth;
- location data, if you choose to give this to us;
- gender data, if you choose to give this to us;
- whose profile you viewed;
- matters you give us by phone, email, post or via social media;
- account details, such as username and login details, as well as your profile photo;
- technical information about your use of our Service;
- your marketing preferences;
- your responses to surveys, competitions and promotions;
- any other information you disclose to us voluntary.

If you do not provide personal data we ask for where it is indicated to be 'required', we might not be able to provide the Service to you.

We collect and use this personal data for the purposes described in the "**How and why your data is used**" section below.

Cookies

A cookie is a small text file which is placed onto your device (e.g., computer, smartphone or other electronic device) when you use our website. We use cookies on our website. These help us recognise you and your device and store some information about your preferences or past actions.

You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies some parts of our website and the Service may not be accessible or may not function properly. You can learn more about this and the cookies and other tracking technologies we use by reading our **Cookie Policy**.

How Your Data Is Collected

We collect personal data from you:

- directly, when you enter or send us information, such as when you register for an account, contact us, send us feedback or use our Service; and
- indirectly, such as your browsing activity while using our Service. Usually, the information collected indirectly via using the technologies explained in "**Cookies**" section below.

How And Why Your Data Is Used

We use your personal data for the following purposes:

- to create and manage your account with us;
- to provide the Service to you;
- to conduct checks to identify you and verify your identity or to help prevent and detect fraud against you or us;
- to enforce legal rights or defend or undertake legal proceedings;
- to customise our website, application and their content to your particular preferences based on a record of your selected preferences or on your use of our website or the application;
- to retain and evaluate information on your recent visits to our website or application and how you move around different sections thereof for analytics purposes to understand how people use our website or application so that we can make it more intuitive or to check our website or application is working as intended;
- to send you newsletters about company news, offerings, and promotions;
- to make non-marketing related communications to you, about changes to our terms or policies or changes to the Service or other important notices;
- to protect the security of systems and data;
- for statistical analysis to help us manage our business, e.g., in relation to our financial performance, customer base, Service or other efficiency measures;
- for updating and enhancing user records;
- for disclosures and other activities necessary to comply with legal and regulatory obligations that apply to our business, e.g., to record and demonstrate evidence of your consents;
- to market our Service to existing and former users;
- external audits and quality checks, e.g., for the audit of our accounts and the security of our Service;
- we may need to share your personal data with members of our group and third parties in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency. In such cases information will be anonymised where possible and only shared where necessary.

We use your personal information based on consent you provide to us. You may withdraw your consent by contacting us (see '**Contact us**' below). Please remember that once you withdraw your consent, you might not be able to experience the whole functionality of our Service. However, in some cases we are required to process your personal data as authorised or required by legal obligations applicable to us. In these situations, we will keep processing your personal data as long as it is required.

Marketing Communications

Where you have opted in to receive marketing communications from us, we may use your personal data to send you updates by email about our Service, including exclusive offers, promotions or new features. In using your personal data for such marketing purposes, we rely on your consent. This means that we will use your details for marketing purposes only if you have consented to have such

communications from us. You are not under any obligation to provide us with your personal data for marketing purposes, and you can withdraw your consent to your personal data being processed in this way at any time by contacting us at request@lit.it or using the 'unsubscribe' link in emails received from us. If you do choose to withdraw your consent, this will not mean that our processing of your personal data before you withdrew your consent was unlawful.

Your Rights

By using our Service, we provide you with the following basic rights:

- access to and update the personal information you have provided us with through any means (e.g., via your account, email, phone);
- delete the personal information you have provided us with through any means (e.g., via your account, email, phone).

Please remember that you may also change or limit advertising identifiers in your device through mobile privacy settings without our intervention to such actions.

Disclosure Of Your Data

Any information collected and processed by us is treated with the utmost confidentiality. We will make no public release of any personal information that is collected. We ensure we always include the controls and warranties embodied in this Privacy Policy to the contracts and agreements we enter into with our partners and contractors to whom we grant access to your personal data. Once they will have access to your data, they will provide the same equal protection as stated here.

We may be legally obliged to disclose your personal data to the competent state authority, enforcement agency or a court in case we receive a mandatory request for such disclosure from them, including to meet national security or law enforcement requirements and/or to comply with a judicial proceeding, court order, or legal process served on our Service. What is more, we may be proactive and address the competent authority in case we suspect a violation of law to be committed in association with your persona via our Service.

If we are involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

We routinely share personal data with third parties helping us to run our business, e.g., website hosts (such as Amazon Web Services) and website analytics providers (such as Google Analytics). We use Google Analytics to better understand our audience and users, to improve our marketing campaigns, and to enhance our Service. To opt out of being tracked by Google Analytics across all websites, you can visit <http://tools.google.com/dlpage/gaoptout>.

We may also need to share personal data with external auditors, professional advisors (such as lawyers and other advisors), law enforcement agencies, courts, tribunals and regulatory bodies to comply with our legal and regulatory obligations; or other parties in connection with a significant corporate transaction or restructuring. Usually, information will be anonymised but this may not always be possible, however, the recipient of the information will be bound by confidentiality obligations.

Data Storage

We ensure that the personal data are not retained longer than necessary in relation to the purpose for which they are processed. In order to ensure compliance with this principle, we define the retention periods applicable to each processing operation. The following elements are considered when determining the retention period:

- legal obligations;
- recommendations of supervisory authorities;
- best practices;
- our operational needs.

Different retention periods apply for different types of personal data. Deleting your account will automatically entail deletion of your data, unless its storage is justified by legal obligation or our legitimate interest to do so. You may solely delete your account under its settings or request a deletion of your account at any time by sending us an email at request@lit.it.

Following the end of the relevant retention period, we will delete or anonymise your personal data.

Data Transfer

By using our Service, you consent to the transfer of information that we collect about you, including personal information, to any country in which we or our service providers are located. When transferring your personal data, we will do all reasonable measures to verify that an importing entity has all necessary organisational and technical measures to secure your personal data.

Data Protection

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully, such as data encryption. We limit access to your personal data to those who have a genuine business need to access it.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

It is your responsibility to protect the confidentiality of your passwords, account information, and any other access features associated with your access or use of the website or the Service, as well as to adhere to any applicable Terms of Use or other contract between us and you for the Service.

Notifiable Data Breaches

In case of data breaches that are likely to result in serious harm to affected individuals, we might be required to notify you and appropriate data protection authority about such breaches and recommend steps you can take to limit the impacts of a breach. If we believe there has been a data breach that impacts your personal information and creates a likely risk of serious harm, we will notify you and the applicable data protection authorities as soon as practicable and we will further provide you with all necessary information you need to know about such a data breach (e.g., nature of breach, the steps we are taking and what you can do on your own to mitigate negative influence on your privacy).

Updates To This Privacy Notice

We may change this Privacy Notice from time to time. When we make significant changes, we will take steps, at our sole discretion, to inform you, for example by including a prominent link to a description of those changes on our website for a reasonable period or by other means, such as email.

Contact Us

You can contact us by post or email if you have any questions about this Privacy Notice or the information we hold about you, to exercise a right under data protection law or to make a complaint. Our contact details are shown below:

Name: LitTech Pte. Ltd.

Postal address: 10 Anson Road, #23-05, International Plaza, Singapore (079903) **Email:**
request@lit.it

ADDITIONALLY FOR USERS FROM SINGAPORE

If you are a user from Singapore, provisions of the Privacy Notice for users from jurisdictions other than the US, UK and EEA will apply to you subject to additional things you need to know about processing of your personal data pursuant to the relevant laws, rules and regulations established in Singapore. You have the additional right to request us for copies of your personal data to be transmitted to a new service provider to facilitate switching. This right might only be fulfilled if such a service provider is formed or recognised under the laws of Singapore or a prescribed foreign country or territory (e.g., an applicable country), or be resident or having an office or a place of business in Singapore or an applicable country.

Data Protection Officer

If you have any questions towards our processing of your personal data, you may contact our Data Protection Officer, Taras Lytovchenko, via e-mail dpo@lit.it.

ADDITIONALLY FOR USERS FROM PHILIPPINES

If you are a user from Philippines, provisions of the Privacy Notice for users from jurisdictions other than the US, UK and EEA will apply to you subject to several additional things you need to know about processing of your personal data pursuant to the relevant laws, rules and regulations and issuances by the Philippines National Privacy Commission (“NPC”) on data privacy.

Legal Basis

Under Philippine’s data protection law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent;
- to comply with our legal and regulatory obligations;
- for the performance of a contract with you or to take steps at your request before entering into a contract;
- the processing is necessary in order to respond to national emergency, to comply with the requirements of public order and safety, or to fulfil functions of public authority which necessarily includes the processing of personal data for the fulfilment of its mandate;
- the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party or parties to whom the data is disclosed.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

By using or accessing our Service you give us the consent to collect and process your personal data for the purposes, we mention in this Privacy Notice.

We do not collect any type of sensitive data.

Your Rights

If you are a user from Philippines, you have the following additional rights in relation to the processing of your personal data:

Right to be informed: you have the right to know when his or her personal data shall be, are being, or have been processed.

Right to object to processing: when processing of your personal data required a notice and consent and you objected to your information being collected and used, you will be able to disengage with the activity.

Right to erasure or blocking: you are allowed to suspend, withdraw or order the blocking, removal, destruction of your personal information from our personal information filing system.

Right to data portability: You can request a copy of personal information we held about you, and then you may ask for the transfer of such copy from us to another entity.

Right to complain to the relevant data protection authority: You have the right to lodge privacy complaint if you believe that the processing of your personal information has been mishandled. For more information, please refer to the 'How to complain' section below.

How To Complain

If you are not happy with how we are processing your personal data, you have the right to complain to the NPC. You may file a complaint via the following email address: complaints@privacy.gov.ph.

Remember that along with filing complaint form, you also have the right to damages which entitles you to be indemnified for any damages sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of your personal information.

Data Protection Officer

If you have any questions towards our processing of your personal data, you may contact our Data Protection Officer, Taras Lytovchenko, via e-mail dpo@lit.it.

ADDITIONALLY FOR USERS FROM INDONESIA

If you are a user from Indonesia, provisions of the Privacy Notice for users from jurisdictions other than the US, UK and EEA will apply to you subject to several additional things you need to know about processing of your personal data pursuant to the relevant laws, rules and regulations established in Indonesia.

Your Age

For your consent to processing of your personal data to be valid, you must be at least 21 years of age or legally married or not under guardianship or have another capacity to give such a consent. If you are below 21 years old and you do not have capacity to give consent for data processing because of other reasons, you must obtain approval from your parent or legal guardian for your use of this Service and our processing of your data

When you use our Service, you acknowledge that you have all rights for such use, as well as you provide us with the consent to process your data.

Your Rights

If you are a user from Indonesia, you have the additional right to request us to erase any irrelevant personal data in relation to the processing of your personal data. The "irrelevant data" means personal data:

- that were obtained and processed without consent;
- where the consent for the use of which has been withdrawn;
- that were obtained and processed unlawfully;
- that are no longer in line with the purpose of its collection; - the use of which has exceeded the applicable period of use; and/or
- that were displayed by us, and this inflicts losses to you.

This right is subdivided into two separate rights: the right to erasure (from the electronic system) and the right of delisting that is the removal of personal data from search engine. You may exercise each of them, if necessary. Please note that the delisting must be done only based on court order which will be issued based on your application.

Data Retention

We are likely to keep your personal data for a minimum of 5 years in accordance with our legal obligations unless another will be stipulated by applicable data protection law. Personal data may be retained beyond the five-year period if we keep using it following the initial purpose.

Please note that we will destroy your personal data only after the lapse of the regulatory data retention period established by the relevant Indonesian authority or upon your request unless otherwise governed under laws and regulations.

ADDITIONALLY FOR USERS FROM THAILAND

If you are a user from Thailand, provisions of the Privacy Notice for users from jurisdictions other than the US, UK and EEA will apply to you subject to several additional things you need to know about processing of your personal data pursuant to the relevant laws, rules and regulations on data privacy.

Your Age

For your consent to processing of your personal data to be valid, you must be at least 20 years of age or have another capacity to give such a consent. If you are below 20 years old and you do not have capacity to give consent for data processing because of other reasons, you must obtain approval from your parent or legal guardian for your use of this Service and our processing of your data along with providing us your consent.

When you use our Service, you acknowledge that you have all rights for such use, as well as you provide us with the consent to process your data.

Data Protection Officer

If you have any questions towards our processing of your personal data, you may contact our Data Protection Officer, Taras Lytovchenko, via e-mail dpo@lit.it.

ADDITIONALLY FOR USERS FROM AUSTRALIA

If you are a user from Australia, provisions of the Privacy Notice for users from jurisdictions other than the US, UK and EEA will apply to you subject to several additional things you need to know about processing of your personal data pursuant to the relevant laws, rules and regulations and issuances by the Office of the Australian Information Commissioner (OAIC) on data privacy.

Your Rights

If you are a user from Australia, you have the following additional rights in relation to the processing of your personal data:

Right to rectification to errors: You are allowed to require us to correct your held personal data as information held, used and disclosed by us should be complete, accurate and up to date.

Right to object to processing: When processing of your personal data required a notice and consent and you objected to your information being collected and used, you will be able to disengage with the activity.

Right to restrict processing: In situations when it is allowed, you have a control over your personal information, and thus the right to restrict processing once you consider it necessary.

Right to data portability: You can request a copy of personal information we held about you, and then you may ask for the transfer of such copy from us to another entity.

Right to withdraw consent: If you want us to stop the processing your personal information, you can ask for the withdrawal of your consent. Please remember once you withdraw your consent, you might not be able to experience the whole functionality of our Service.

Right to complain to the relevant data protection authority: You have the right to lodge privacy complaint if you believe that the processing of your personal information has been mishandled. For more information, please refer to the 'How to complain' section below.

How To Complain

Please contact us if you have any query or concern about our use of your information (see above "Contact us" section). We hope we will be able to resolve any issues you may have. When you make the complaint, make sure you identify yourself, give a brief description of the matter and why you think we mishandled your personal information, date, contact information and please let us know what you'd like us to do to resolve the matter.

You also have the right to lodge a complaint with the OAIC. However, though we aim to resolve complaints as quickly as possible, please remember that the law also allows 30 days for us to deal with the complaint, before you may make a complaint to the OAIC.

The OAIC can be contacted at:

GPO Box 5218

Address: Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au