

PRIVACY POLICY

The current Privacy Policy depicts your privacy rights in terms of gathering, use, storing, sharing, and protecting your personal data. You agree to this Privacy Policy by signing up, accessing Website or using Rinne Services. If you do not agree, you should stop accessing this Website and/or use the Services provided by Rinne immediately and refrain from further access and use of them.

The following definitions will apply in this Privacy Policy:

You, Your refers to any user of this Website and Our Services.

We, Us and Our refers to Rinne or the Rinne's affiliated parties.

Rinne means Rinne Technologies Sdn. Bhd., a legal entity registered in Malaysia with registration number 1248860-H.

Rinne affiliated parties refer to Rinne affiliates, subsidiaries and its respective directors, employees, agents and shareholders.

The Website refers to the Rinne Website www.rinne.tech including all its content and the website running the Rinne Flact System including all its content (e.g. all websites like https://****.iflact.com/).

Services mean services of providing access to the software solutions, technologies and information which are powered and provided by Rinne to You and as well as consulting services related to such software solutions, technologies and information.

Data means data and/or information submitted by you through the Website or by other means to us, including your personal data.

Personal Data means any information, which, either alone or in combination with other information we process about you, identifies you as an individual.

Data Protection Laws mean all applicable laws, rules and regulations regarding the handling, collection and transfer of Personal Data, including where applicable, the Data Protection Acts of 1984 and 1998, Directive 95/46/EC of the European Parliament, any regulations implementing such Directive and General Data Protection Regulation (GDPR) (EU) 2016/679 and the PDPA in Malaysia (<https://www.malaysia.gov.my/portal/content/654>) - hereinafter called **Data Protection Law**.

ROLES AND RESPONSIBILITIES

Rinne Services are designed for business, so most of our clients are legal entities. In relation to the Personal Data of your company's officers, directors or contact persons and Personal Data of clients who are individuals we act as a data controller in the meaning given by the General Data Protection Regulation (the "GDPR") and are subject to controller's rights and obligations under applicable Data Protection Laws.

When you submit any Personal Data to us, you are also acting as a data controller and you shall warrant that you obtain prior consent from your clients or employees to collect, use and process their personal data by Rinne or ensure that you have another appropriate legal basis for the data processing.

We, for our part, warrant to you that we will process your Personal Data to provide you with high-quality services and only on documented instructions from you and will comply with our obligations as a data controller under the applicable legislation. We will assist you by appropriate technical and organizational measures, insofar as this is possible, for the fulfilment of your obligation to respond to requests for exercising the data subject's rights.

INFORMATION WE MAY COLLECT

In case you access Website or otherwise use Rinne Services, the following type of data might be gathered:

- your company name, address, registration number and other company details;
- first and last name, phone number and e-mail of yourself and your contact persons or officers;

- your device data (such as a type of device, operating system, IP-addresses and advertising ID's, your location, web and mobile network data), cookies and usage data on how you use our products and services. Such information by itself does not constitute Personal Data and is used to safeguard from scam and to improve our services;
- your publicly available profile information (LinkedIn, Facebook, Twitter, Google Accounts).

We do not collect any extra data but only that information that is necessary for providing Rinne Services to you. However, please be aware that the list of information types mentioned above is not exhaustive. Additional information about you might be gathered in some other way, for instance by your contacting our support team or taking part in surveys, etc.

HOW CAN WE USE YOUR DATA

You should be aware that the processing of your Personal Data is necessary for the performance of a contract with Rinne to which you are the party. The data we collect may be used to:

- Open and manage your account with us, to administer our Services;
- Keep communication with you;
- Improve the quality of Rinne Services;
- Provide target-oriented services based on your experience with the Website;
- Respond to your inquiries and fulfil your requests;
- Send to you administrative information, including information regarding the services and changes to our terms, conditions and policies;
- with your consent, to send you marketing e-mails about upcoming promotions, and other news, including information about products and services offered by us and our affiliated parties. You may opt-out of receiving such information at any time: such marketing emails tell you how to "opt-out." Please note, even if you opt-out of receiving marketing emails, we may still send you non-marketing emails;
- To comply with legal requirements, to respond to requests from public or government authorities.
- Settle disputes and resolve occurring problems;

Your Data is not used for any additional purposes not mentioned in this Privacy Policy or the contract with Rinne. We do not share your Personal Data with any third parties except as mentioned in this Privacy Policy below (section "How We Share Your Data With Third Parties").

SPECIAL CATEGORIES OF PERSONAL DATA

We do not intentionally collect any "special category" of personal data, such as your biometric data, religious beliefs, health information, racial or ethnic origin etc. Nevertheless, there might be cases when information or documents data subject submits to us or you willingly upload to the system contain sensitive information or we can obtain it in the course of providing our Services. Depending on such data purpose, we may delete it or to request you to provide explicit consent to process your sensitive Personal Data by e-mail. Such information may be processed only by your consent or if the law requires this.

AUTOMATED DECISION MAKING AND PROFILING

We do not use your Personal Data for the purposes of automated decision-making. However, we may do so in order to fulfil obligations imposed by law, in which case we will inform you of any such processing and provide you with an opportunity to object.

PROTECTION AND STORAGE OF YOUR DATA

We warrant and represent that we have implemented the technical and organizational security measures and technological development to ensure an appropriate level of security of personal data. Your Data is protected by the means of physical, technical, and administrative resources to lower the risks of loss, misuse, unauthorized

entry, disclosure, or alteration by a third party. To keep your data safe we apply firewall and data encryption protection and physical authorization control system, just to name a few. We monitor our systems 24x7 and our staff is always ready to respond to your notifications and queries within a short time.

HOW LONG WE RETAIN YOUR DATA

We may use your Data for as long as reasonably necessary for the limited purpose of providing of our Services or for the purpose to comply with technical and legal requirements related to the security, integrity and operation of Rinne Services. After the termination of the agreement between Rinne and you, you may request deletion of your Data. We are able to delete your Data or information within thirty days.

PASSWORD SECURITY

You shall maintain the confidentiality of your passwords. We recommend you to sign out of your account when you have finished work with it. If you feel that the security of your account has been compromised, please immediately notify us of the problem. In any case, you bear responsibility for any loss of passwords and misuse of your account by third parties.

HOW WE SHARE YOUR DATA WITH THIRD PARTIES

We may engage third-party service providers to work with us to administer and provide the Services. These third-party services providers have access to your Personal Data only for the purpose of providing services on our behalf (such as hosting of the services, data analysis, IT services and infrastructure, customer service, e-mail delivery, auditing, payment processing and other similar services) and are normally obligated not to disclose or use your Personal Data for any other purpose.

We may also transfer your Personal Data to our professional advisers (such as lawyers, accountants, auditors, it consultants, management consultants), who is under a professional obligation to maintain confidentiality and security of Personal Data.

Your personal information may be shared with third parties if so required by applicable laws, regulations, and instructions we must obey or in the response of court order or requirements of other government bodies. Information we collect from our users, including Personal Data, is considered a business asset. As a result, if we go out of business or enter bankruptcy or if we are acquired as a result of a transaction such as a merger, acquisition or asset sale, your Personal Data may be disclosed or transferred to the third-party acquirer in connection with the transaction.

CROSS BORDER DATA TRANSFERS

Rinne strives to store all Personal Data on the secured cloud servers. However, you should aware that Personal Data may be accessed by us or transferred to us or to our affiliates, business partners, merchants, or service providers elsewhere in the world. By providing us with your Personal Data, you consent to such transfers. We will protect the privacy and security of Personal Data according to our Privacy Policy and data protection laws, regardless of where it is processed or stored. We will use legal mechanisms to transfer Personal Data to other countries safely.

COOKIE POLICY

When you visit our Website or use Rinne Services, a small cookie file may be placed on your computer or mobile device. We will analyze data from the cookies and use it to improve the quality of our services, track your activities with Rinne Services, and keep your account safe. Any data that we collect and store using cookies is first obtained through notice and consent. We obtain your consent by providing you with transparent notice of the use of the cookies and, to the extent described herein, providing you with the opportunity to make a choice to disable these cookies, except the session cookies.

- **What the cookie is?**

A cookie is a small text file stored in a computer's web browser memory.

There are three main types of cookies:

Session cookies – they help you do not re-enter information and stay logged in each time you change web pages. Session cookies are deleted automatically after you leave the Website or when you close your browser.

Persistent cookies – they help us to recognize you each time you return to the Rinne Website and remember your preferences for viewing the site. Such cookies are stored on your computer until deleted by you or automatically after its expiration.

Third-party cookies - are the persistent cookies placed not by Rinne, which help to gather browsing activity across numerous websites and during several sessions. Such cookies are stored on your computer until deleted by you or automatically after its expiration.

- **How we use Cookies**

We use cookies for the following purposes:

Authentication. When you login in our Website, we use cookies to remember you so you do not have login each time you left the main page and navigate throughout the Rinne Website.

Fraud Prevention. With the help of cookies, we can obtain information about the security of your computer and web browser used to access the Website and to detect harmful or illegal use of our Services.

Settings. We can use cookies to remember your settings of the Rinne Services so you do not have to change it each time you log into Website.

Improving Our Services. We use cookies to understand how we can make our Website or Rinne Services better. Cookies help us to know how people reach the Website, detect and gather reporting on bugs; improve the functionality and speed of the Website.

Marketing. From time to time we can use cookies to show you more relevant ads, e.g. to not show the same ads multiple times or recognize actions across multiple devices or browsers, etc. We reserve the right to use Google Analytics to understand how users use the Website. You can opt-out of Google Analytics Advertising Features as described below.

- **Other tracking technologies we use**

There are other technologies used by us to track your activity on the Website.

Web beacons (web pixels) are small graphics helping to understand browsing activity, track conversion and optimize ads. These graphics file is downloading when you visit the Website.

Local Storage Objects (flash cookies) are files that can be stored on your browser and can be used to detect preferences, to record the history of usage, or remember settings of the Website. You can block or control flash cookies at any time by modifying the settings of your browser.

Google Analytics. Google Analytics is third-party technology, which allows collecting and analyzing information about how you use the Rinne Services and Website and creating relevant reports. For Google Analytics Advertising Features, you can opt-out through Google Ads Settings. Google also provides a Google Analytics opt-out plug-in for the web.

- **How you can disable Cookies**

You can to delete and disable cookies using the setting of your browser. You can find out more about how to manage cookies from the following links:

For Chrome browser: <https://support.google.com/chrome/answer/95647?hl=en>

For Explorer browser: <https://support.microsoft.com/en-us/products/windows?os=windows-10>

For Safari browser: <https://support.apple.com/kb/PH21411>

For Firefox browser: <https://support.mozilla.org/products/firefox/cookies>

For Opera browser: <http://www.opera.com/help/tutorials/security/cookies/>

In addition, you can use third-party tools, like browser plug-ins or applications allowing you to monitor, block or limit third-party cookies, web pixels and some JavaScript-based technologies.

Please note that if you disable cookies or other similar technologies, you may not be able to take advantage of certain Website features or our Services.

ACCESSING OR CHANGING YOUR DATA

If you are a natural person, you have the following rights in regard to your Personal Data:

- to know what your Personal Data we process and in what way;
 - to ask us to erase or delete all or some of your Personal Data. Note that not all Personal Data may be deleted due to security or legal reasons. Also, you must complete the authentication procedure you before we can fulfil your request.
 - to ask us to change, update or fix your Personal Data if it is inaccurate.
 - to ask us to stop using all or some of your Personal Data (e.g., if you believe that we have no legal right to keep using it).
 - to ask us to provide a copy of your Personal Data we keep unless this adversely affects the rights and freedoms of other users.
 - to object the usage of Personal Data for direct marketing purposes or automated decision-making;
 - to appeal to the Data Protection Authority or the court, in case if you do not agree with our answer to your request or claim,
- and other rights established in Data Protection Laws.

If you are not happy with how we are processing your personal data, please let us know by sending an email to **support@rinne.tech**.

When making a request to us you should specify your name, surname, contact details, relevant information, which would indicate why you believe that your Personal Data must be deleted, changed or data processing be limited. After examining your request, we will report the results within a reasonable time and, if the decision is positive, state the actions were taken to satisfy your request.

LEGAL BASIS

Processing of Personal Data is permitted only under the several legal bases provided by Data Protection Laws.

By providing you with our Services, we process your Personal Data based on:

- a) Contract: We can process Personal Data to fulfil our contractual obligations (e.g. if you and we enter into terms and conditions when you creating an account on our Website).
- b) Legitimate interest: We can rely on this legal basis when we carry out procedures which are the part of our Services or which are transparent, expectable and are the stable business practice.
- c) Consent: We can request from you consent for data processing when we process the sensitive Personal Data, send you marketing e-mails or if so required by law.

This list is not exhaustive and we may use other ground provided by Data Protection Laws if none of the above-mentioned basis can be applied.

AGE RESTRICTIONS

We do not intentionally collect, use or disclose Personal Data of persons under 18 or younger than equivalent minimum age in your jurisdiction. Rinne Services are not designed to attract minors. If you are under the age of 18 (or the relevant minimum age in your jurisdiction), you must not submit any Personal Data to us or subscribe for our Services. If we become aware that we have obtained the Personal Data of a minor, we will delete it as soon as possible.

THIRD-PARTY SITES

Our Website may contain links to third-party websites and features. This Privacy Policy does not cover the privacy practices of such third parties. These third parties have their own privacy policies and we do not accept any responsibility or liability for their websites, features or policies. Please read their privacy policies before you submit any data to them.

DATA BREACHES

We ensure you that we have all the necessary technologies and methods to prevent, detect and investigate a Personal Data breach. In case of any data breach, we will endeavor our best efforts to send you a notification within 72 hours of becoming aware of the breach.

CHANGES TO THIS PRIVACY POLICY

We can make amendments to this Privacy Policy at any time by the means of publishing a revised edition on the Website. We will notify you of any substantial changes. The revised version will be in effect immediately and be noted by updated date to the end of this Privacy Policy. You should revisit the Website to stay aware of any changes. You are entitled to terminate the agreement with Rinne if you do not agree on any changes. By continuing using Rinne Services, you accept the changes.

Please feel free to contact us to ask any questions or notify us of a data breach.

OUR CONTACTS:

info@rinne.tech

inquiries@rinne.tech

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