

This Privacy Policy applies to the access and use of the Fly My Cloud Website currently located at [www.flymycloud.com](http://www.flymycloud.com) and the Fly My Cloud Client Area currently located at [www.flymycloud.com/client](http://www.flymycloud.com/client) (the “**Client Area**”) (collectively the “**Fly My Cloud**”), including, and the use by registered users of the Fly My Cloud Platform of Fly My Cloud products and services (the “**Cloud Services**”) provided by the Fly My Cloud entity listed the Terms of use of Fly My Cloud (website or services) (referred to as “**we**”, “**our**” or “**Fly My Cloud**” hereinafter). Terms not defined in this Privacy Policy shall have the same meaning as in the Terms of Use of the Fly My Cloud Platform.

This Privacy Policy sets out how we may collect, use, transfer, retain, secure and disclose your personal data and/or personal data about your customers or end users that you provide to us pursuant to your use of the Fly My Cloud Platform and/or our Cloud Services, as well as other terms relating to data location. It also describes your choices regarding use, access and correction of your personal data. By accessing the Fly My Cloud Platform or using the Cloud Services, you consent to the collection, use, transfer, retention and disclosure of such personal data in accordance with the terms of this Privacy Policy and agree to accept and be bound by the terms herein. Many of our Cloud Services offered through the Fly My Cloud Platform are intended for use by business organisations. You acknowledge and agree that if you use your organisation’s email address to register an account and purchase or use our Cloud Services, the owner of the domain associated with your organisation’s email address, and/or your organisation, may monitor or control your account with the Fly My Cloud Platform and access, process, and/or control your personal data, as well as the contents of your communications and files. You acknowledge and agree that your organisation’s use of our Cloud Services may be subject to your organisation’s own rules or policies, and you shall direct all privacy enquiries relating to such rules or policies to your organisation’s administrators. We are not responsible for the privacy or security practices of your organisation. Cloud Services may be used by our customers (i.e. registered users of Fly My Cloud) to develop or host their own services and products for the customer’s end users. Any information collected or handled by Fly My Cloud in such circumstance is processed on behalf of our customer who controls the collection and use of such information. We do not have a direct relationship with the end users of our customers. End users should direct all privacy enquiries, such as any requests to access, correct, amend or delete personal information, to the Fly My Cloud customer providing their services or products. We are not responsible for the privacy or security practices of our customers.

## **A. COLLECTION OF PERSONAL DATA**

1. If you are (i) an individual or (ii) a representative of a business organisation at the time you register to become a user of the Fly My Cloud Platform and/or purchase Cloud Services, you may be asked to complete registration forms

which require you to provide information such as your email address, mobile number, country, name, contact and billing addresses. You may also provide to us additional optional contact information in your account profile, such as email address for sub-accounts, and additional contact phone numbers.

2. We record and retain details of your activities (including any purchase or use of our product offerings and services) when you use the Fly My Cloud Platform and/or certain Cloud Services for legal and/or business purposes. If you make purchases or otherwise transact online through the Fly My Cloud Platform, we also collect information related to such transactions including, but not limited to, the types and specifications of the Cloud Services, pricing information, and any trade dispute/complaint records.
3. When you contact our customer support, sales or other departments, we keep records of the communications.
4. If you make online purchases for our Services through the Fly My Cloud Platform, you may be required to provide information related to your payment instrument (such as credit cards), including information about your payment instrument organisation, your payment instrument number, the security code, and the expiration date of your payment instrument, directly to our payment service provider.
5. Please note that it is mandatory for you to provide certain categories of data (as specified at the time of collection). In the event that you do not provide any or sufficient data marked as mandatory, we may not be able to complete the registration process or provide you with our Cloud Services.
6. We also record and retain records of users' buying and browsing activities on the Fly My Cloud Platform, including but not limited to Internet Protocol ("IP") addresses, browsing patterns and buying behavioural patterns. In addition, we automatically gather statistical information about our Fly My Cloud Platform and visitors to our Fly My Cloud Platform including, but not limited to, IP addresses, browser software, operating system, software and hardware attributes, pages viewed, number of sessions and unique visitors.
7. We may from time to time collect additional information from you (such as copies of identification documents) and obtain information about you from third parties in order to carry out risk control, fraud prevention and compliance procedures. For example, we may collect payment-related information from third parties and combine it with information we collect about you for the purpose of fraud prevention and risk control.

## **B. PURPOSES FOR THE COLLECTION, RETENTION, USE, DISCLOSURE AND TRANSFER OF PERSONAL DATA**

If you provide any personal data to us, you consent (or shall have procured the relevant consent from your organisation, your end users, or relevant third parties) to our collection, retention, use and disclosure of that personal data for the following purposes:

1. processing your registration as a user, providing you with an user ID for our Fly My Cloud Platform and maintaining and managing your registration;
2. providing you with customer service and responding to your queries, feedback, claims or disputes;
3. providing the Cloud Services to you and/or your end users;
4. processing your purchases and/or subscriptions on the Client Area;
5. performing research or statistical analysis in order to improve the content and layout of our Fly My Cloud Platform, to improve our product offerings and services;
6. publishing any information voluntarily submitted by you (which may include, but is not limited to, a photograph or other personal data you provide) to our Fly My Cloud Platform to be published on our Fly My Cloud Platform through the publishing tools (such as our discussion forums);
7. to comply with applicable law, legal process or lawful government request, or in respect of any claims or potential claims brought against us or our parent companies, shareholders, subsidiaries and affiliates;
8. processing the personal data in accordance with your instructions;
9. performing risk control, legal compliance and sanctions screening;
10. performing screening and checks for unlawful, fraudulent, deceptive or malicious activities; and
11. purposes which are reasonably related to the aforesaid.

#### Additional Purposes

Subject to obtaining your specific consent and/or where permitted by applicable law, we may use your name, phone number, residential address, email address and fax number (which may incorporate personal data) to provide notices, surveys, product alerts, communications and other marketing and promotional materials to you relating to goods and services offered by us on our Fly My Cloud Platform.

#### **C. DISCLOSURE OF PERSONAL DATA**

1. You agree that we may disclose your personal data to third party service providers engaged by us at our sole discretion to assist with providing you with our services (including providing customer services to you, contacting you regarding promotions products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services) (the "Third Party Service Providers"). These Third Party Service Providers may be located in Singapore or outside of Singapore, and are

under a duty of confidentiality to us and are only permitted to use your personal data in connection with the purposes specified in Section B above, and not for their own purposes.

2. You acknowledge that the Client Area enables you to purchase or subscribe to products and services ("**Client Area Products**") from companies other than Fly My Cloud ("**Third Party Vendors**"), and should you purchase or subscribe to Client Area Products offered by a Third Party Vendor, you agree that we may provide such Third Party Vendor with your personal data for the purposes of processing your purchase and/or subscriptions on the Client Area. Other than such personal data disclosed by Fly My Cloud to the Third Party Vendor, in some cases you may be required to submit personal data to Third Party Vendors to use such Client Area Products. This Privacy Policy does not apply to such collection, use or disclosure of personal data by Third Party Vendors. The privacy policies of Third Party Vendors may differ from ours, and we have no control over the information that you submit to those Third Party Vendors. You should read the relevant privacy policies for those Third Party Vendors before providing your information to such Third Party Vendors.
3. You agree that we may disclose your personal data to other companies within the Fly My Cloud Limited for the purposes specified at Section B above.
4. Any personal data supplied by you will be retained by us for legal and/or business purposes and will be accessible by our employees for or in relation to any of the purposes stated in Section B above, and will be retained and/or processed by any Third Party Service Providers engaged by us and third parties referred to in C.1 and C.2 above for or in relation to any of the purposes stated in Section B above.
5. We may provide statistical information to third parties, but when we do so, we do not provide personally-identifying information without your permission.
6. Our website offers publicly accessible community forums. You acknowledge and agree that any information you provide in these areas may be accessed, read, collected, and used by others anywhere in the world. To request removal of your personal data from our community forums, contact us at [compliance@flymycloud.com](mailto:compliance@flymycloud.com).

#### **D. TRANSFER OF PERSONAL DATA**

As part of providing you with the Cloud Services, we may need to transfer your personal data from your jurisdiction to an overseas jurisdiction. Recipients of the data in these jurisdictions may be subject to data privacy laws less protective or not equivalent to those in your own jurisdiction. You acknowledge and agree that any such overseas transfer or processing of your personal data is necessary to process and administer your customer account and to provide the Cloud Services (including providing customer services to you, contacting you regarding promotions, products and services, performing risk control, fraud prevention and legal compliance procedures, and conducting payment processing services) and you consent to the

same. You further agree and consent to Fly My Cloud processing your personal data on your behalf pursuant to this Privacy Policy and/or the Fly My Cloud Membership Agreement and you appoint us to perform any such transfer of personal data to any such country and to store and process such personal data in order to provide our Cloud Services to you. You are solely responsible for ensuring compliance with any laws or regulatory obligations relating to personal data and/or privacy and your use of the same on or in connection with the Cloud Services, and you warrant that you have obtained all requisite consents from all relevant data subjects to permit the use of the same.

## **E. SECURITY MEASURES**

1. We use commercially reasonable endeavours to protect the personal data that you provide to us. We also employ several security techniques, including but not limited to the use of industry-standard Secure Socket Layer (SSL) encryption for transmission of personal data in registration information and payment information and the adoption of identity, credential and access management measures for transmission of such personal data to prevent security breaches and unauthorized access of personal data. We limit access to your personal data and other data to people who need to access to such data for their work.
2. Nevertheless, no data transmission over the internet or any wireless network can be guaranteed to be perfectly secure. As a result, while we try to protect your personal data, we cannot guarantee the security of any personal data you transmit to us and you do so at your own risk. We cannot and do not guarantee security in connection with your use of the Fly My Cloud Platform and our Cloud Services.
3. We may retain your information for as long as your account is active or as needed in accordance with the purpose for which it was collected, to provide you services, to comply with our audit, finance and legal obligations, to resolve disputes, and enforce our agreements with you.

## **F. RIGHT TO ACCESS/CORRECT PERSONAL DATA; CONTACTING US**

You have the right to request access to your personal data held by us (or on our behalf) and to request correction or deletion of such personal data. Additionally, upon request, we will provide you with information about whether we hold your personal information. You may contact us at [compliance@flymycloud.com](mailto:compliance@flymycloud.com) to request access, correction or deletion of your personal data. We will respond to your request within a reasonable timeframe. You may also have supplemental rights under applicable law in relation to your personal data.

Fly My Cloud acknowledges that you have the right to access your personal information. We have no direct relationship with the individuals whose personal data we process. An individual who seeks access, or who seeks to correct, amend, or delete inaccurate data should direct their query to Fly My Cloud 's Client (the data controller). If requested to remove data, we will respond within a reasonable timeframe.

You may receive e-newsletter from us. If you would like to discontinue receiving this information, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you (or at your member profile).

If a minor (a person under the age of 18) has provided us with personal data without parental or guardian consent, the parent or guardian may contact us on the minor's behalf to request that we cease any further collection, use and/or disclosure of the personal data relating to the relevant minor.

If you have any questions regarding this Privacy Policy or if you wish to exercise any of these or other rights you may have under applicable law in relation to your personal data, you may send your request in writing to the following contact and address.

For individuals in relation to processing conducted by or on behalf of Fly My Cloud Limited, please contact:

E-mail address: [compliance@flymycloud.com](mailto:compliance@flymycloud.com)

If Fly My Cloud Limited is not the relevant "data controller" for the purposes of EEA data protection law, you will be directed to the relevant entity.

## **G. COOKIES**

1. We and our partners use "cookies" and/or similar technologies to store specific information about you and track your visits to our Fly My Cloud Platform. We may also use "cookies" to store specific information about your use of certain Cloud Services as part of its features and to facilitate or enhance your user experience of the relevant service. A "cookie" is a small amount of data that is sent to your browser and stored on your device's hard drive. A cookie can be sent to your device's hard drive only if you access our Fly My Cloud Platform using a device. If you do not de-activate or erase the cookie, each time you use the same device to access our Fly My Cloud Platform, our web servers will be notified of your visit to our Fly My Cloud Platform and in turn we may have knowledge of your visit and the pattern of your usage.
2. Generally, we use cookies to identify you and enable us to i) access your registration information so you do not have to re-enter it; ii) gather statistical information about usage by users; iii) research visiting patterns and help target advertisements based on user interests; iv) assist our partners to track user visits to the Fly My Cloud Platform and process orders; v) track progress and

participation in promotions; and iv) facilitate your use of any relevant Cloud Services which may involve the use of cookies. We partner with third parties to manage our advertising on other sites. Our third party partners may use cookies and/or similar technologies in order to provide you advertising based upon your browsing activities and interests, monitor how you use our services or improve your experience using our services.

3. You can determine if and how a cookie will be accepted by configuring the browser which is installed in the computer you are using to access the Fly My Cloud Platform. If you choose, you can change those configurations. You may be able to change your browser preferences or settings to reject all cookies, or are notified and can choose to consent each time a cookie is sent. If you reject all cookies by choosing the cookie-disabling function in your browser, you may be required to re-enter information on our Fly My Cloud Platform more often and certain features of our Fly My Cloud Platform may be unavailable.
4. By accessing and using our Fly My Cloud Platform and/or Cloud Services, and by accepting the cookies, you consent to the storage of cookies on your devices. You also consent to the access of such cookies by us and by our partners mentioned above.

## **H. CHANGES TO THIS PRIVACY POLICY**

Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on our Fly My Cloud Platform. Once posted on our Fly My Cloud Platform the new Privacy Policy will become immediately effective. We may also in our discretion provide notice to you of any changes to the Privacy Policy. If we make any material changes we will notify you by email (sent to the e-mail address specified in your account) or by means of a notice on this website prior to the change becoming effective. You agree that any information and/or personal data we hold about you (as described in this Privacy Policy and whether or not collected prior to or after the amended and restated Policy comes into effect) will be governed by the latest version of our Privacy Policy. We strongly encourage you to visit the Fly My Cloud Platform from time to time to review the Privacy Policy. Your continued use of the Fly My Cloud Platform and/or the Cloud Services signifies your acceptance of the changes to the Privacy Policy.