

Singclaw Website Privacy Policy

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This Privacy Policy applies to the access and use of the Singclaw Website currently located at www.singclaw.ai, as well as your download, installation and use of the Singclaw applications, products and services (collectively, the “Services” or the “Products”), including any in-app purchases, subscriptions or transactions, and the use by registered users of Singclaw products and services (the “Services”) provided by the Singclaw entity listed in Clause 2 of the Terms of Service (referred to as “we”, “our” or “Singclaw” hereinafter). For the purposes of applicable data protection laws, Singclaw acts as the data controller of your personal data, unless otherwise specified. Terms not defined in this Privacy Policy shall have the same meaning as in the Singclaw Product Terms of Service.

This Privacy Policy sets out how we collect, use, transfer, retain, secure and disclose your personal data in connection with your use of the Services and/or personal data about your customers or end users that you provide to us pursuant to your use of the Singclaw and/or our Services, as well as other terms relating to data location.

It also describes your choices regarding use, access and correction of your personal data.

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 Singclaw and/or purchase Services, you may be asked to complete registration forms which require you to provide information such as your email address, mobile number, country, preferred language, name, contact address, and screen nickname.

2. We record details of your activities (including any purchase or use of our product offerings and services) when you use the Singclaw and/or certain Services for legal and/or business purposes.

If you make purchases or otherwise transact online through the Singclaw, we also collect information related to such transactions including, but not limited to, the types and specifications of the Services, pricing information, and any trade dispute/complaint records.

3. When you contact our customer support, sales or other departments, we may record the communications for security and customer services purposes and collect additional information to verify your identity.

4. If you make online purchases for our Services through the Singclaw, you may be required to provide information related to your payment instrument (such as credit cards) directly to our payment service provider.

For in-app purchases or subscriptions made through third-party platforms (such as Apple App Store or Google Play), we do not collect your full payment card details but may receive limited transaction-related information such as purchase confirmations, subscription status and transaction identifiers.

5. Please note that certain categories of data are necessary for us to provide the Services, such as user name, address, phone number, and email address. These categories will be 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 Services.

6. We also keep records of users' buying and browsing activities on the Singclaw, including but not limited to Internet Protocol ("IP") addresses, browsing patterns and purchasing patterns. In addition, we automatically gather statistical information about our Singclaw and visitors to our Singclaw 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.

8. If you use our mobile or desktop applications, we may collect device-related information, including device model, operating system, application version, device identifiers, crash logs and usage data for analytics, security and product improvement purposes.

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

We collect, retain, use and disclose personal data for the following purposes:

1. processing your registration as a user, providing you with a user ID for our Singclaw and maintaining and managing your registration;
2. providing you with customer service and responding to your queries, feedback, claims or disputes;
3. providing the Services to you and/or your end users;
4. processing your purchases and/or subscriptions on the Singclaw;
5. personalizing our communication with you based on your order history, and performing research or statistical analysis in order to improve our product offerings and services;
6. publishing any information you voluntarily submit (which may include, but is not limited to, a photograph or other personal data you provide) to our Singclaw to be published on our Singclaw 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. performing risk control, legal compliance and sanctions screening;
9. performing screening and checks for unlawful, fraudulent, deceptive or malicious activities;
10. providing, managing and improving in-app purchases, subscriptions and paid features;
11. personalizing content, recommendations and user experience based on your usage behaviour;
12. detecting, preventing and investigating fraudulent or unauthorized transactions and misuse of the Services; and
13. providing, and operating AI Features, including generating responses, summaries, and reports.

Subject to obtaining your specific consent (or where otherwise permitted by applicable law in your jurisdiction), 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, related communications and other marketing and promotional materials to you relating to goods and services offered by us on our Singclaw.

C. DISCLOSURE OF PERSONAL DATA

1. We may disclose your personal data to third-party service providers engaged by us to assist with providing you with our services (including partners 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 engaged under terms compliant with applicable data protection laws and/or appropriate duties 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. These Third-Party Service Providers may further contract some components of the services they provide to us to other service providers. These other service providers may also be located in Singapore or outside of Singapore, and are under a duty of confidentiality to our Third Party Service Providers 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. We may provide aggregated or anonymized data to third parties, but when we do so, the information we share is in a de-identified format that does not personally identify you.
3. We have established and will establish relationships with other parties and websites to offer you the benefit of their products and services. We offer you access to these other parties and their websites either through the use of hyperlinks to these sites from our Singclaw or through offering “co-branded” sites in which both we and other parties share the same uniform resource locator, domain name or pages within a domain name on the Internet. In some cases you may be required to submit personal data to register or apply for products or services provided by such third parties or co-branded partners. This Privacy Policy does not apply to these third party sites or co-branded sites. The privacy policies of those other parties may differ from ours, and we have no control over the information that you submit to those third parties. You should read the relevant privacy policy for those third party sites and co-branded sites before responding to any offers, products or services advertised by those parties.

4. Our website offers publicly accessible community forums. 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 service@singclaw.com.

5. We may share your personal data with app distribution platforms (such as Apple App Store and Google Play) for purposes relating to application distribution, payment processing, compliance, and security.

6. We may also disclose your personal data to analytics, cloud hosting, and infrastructure service providers including providers of artificial intelligence or machine learning services; for product performance monitoring, analytics, and improvement purposes.

D. TRANSFER OF PERSONAL DATA

Your personal data is primarily stored in our secure servers located in Singapore. As part of providing you with the Services, we may need to transfer your personal data from your jurisdiction to other jurisdictions where our service providers operate. Recipients of the data in these jurisdictions may be subject to data privacy laws different from those in your own jurisdiction. Such overseas transfer or processing of your personal data may be necessary to process and administer your customer account and to provide the Services effectively.

We will take appropriate safeguards to ensure that such cross-border transfers comply with applicable data protection laws.

E. SECURITY MEASURES

We use commercially reasonable endeavors 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 access to such data for their work.

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 Singclaw and our Services.

We retain your personal data as long as you have an account with us, as needed to provide services or products to you, to resolve disputes, to serve the purpose of research and statistical analysis or as required or permitted by applicable laws, such as tax and accounting laws.

F. PERIOD OF RETENTION AND PROCESSING OF PERSONAL DATA

We retain your personal data for the purposes described in this Privacy Policy where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements). In certain circumstances, we will need to keep your personal data for legal reasons after our relationship has ended. The specific retention periods depend on the nature of the personal data and why it is collected and processed, and the nature of the legal requirement.

When we have no ongoing legitimate business need or legal reason to process your personal data, we will either delete or anonymize it or, if this is not possible, then we will securely store your personal data and isolate it from any further processing until deletion is possible.

G. PROCESS AND METHOD OF DESTRUCTION OF PERSONAL DATA

Singclaw will delete your personal data as described in Section F of this Privacy Policy. When deleting personal data, we will take standard commercially reasonable measures to make the personal data practically irrecoverable or irreproducible. The specific manner of deletion will depend on the data being deleted, how the data was collected and stored, and your interactions with us. Electronic documents or files containing personal data will be deleted using a technical method that makes recovery or retrieval of such information practically impossible or renders the data no longer personally identifiable. Non-electronic documents or files containing personal data will be shredded, incinerated, or both.

H. 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 data. You may contact us at service@singclaw.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. For example, if you are an EEA or UK user,

you have the right to object to or request the restriction of processing of your personal data, and to request portability of your data by contacting us at service@singclaw.com.

In cases where we act as a processor, 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 Singclaw's client (the data controller).

You may receive e-newsletters 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.

We do not knowingly collect personal data of minors (persons under the age of 18). If a minor has provided us with personal data, 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 and delete the personal data we may hold relating to the relevant minor.

You may also request deletion of your account and associated personal data by contacting us.

I. COOKIES

We and our partners use "cookies" and/or similar technologies, such as web beacons and javascript, to store specific information about you and track your visits to our Singclaw. We may also use "cookies" to store specific information about your use of certain 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. A cookie can be sent to your device only if you access our Singclaw using a device. If you do not de-activate or erase the cookie, each time you use the same device to access our Singclaw, our web servers will be notified of your visit to our Singclaw and in turn we may have knowledge of your visit and the pattern of your usage.

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 Singclaw and process orders; v) track progress and participation in promotions; and vi) facilitate your use of any relevant 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. 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 Singclaw. If you choose, you can change those configurations. You may be able to change your browser preferences or settings to reject all cookies, or 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 Singclaw more often and certain features of our Singclaw may be unavailable.

By accessing and using our Singclaw and/or 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. For mobile or desktop applications, we may use similar technologies such as SDKs to collect usage data and analytics information.

J. CHANGES TO THIS PRIVACY POLICY

Any changes to this Privacy Policy will be communicated by us posting an amended Privacy Policy on our Singclaw. The new Privacy Policy will become immediately effective once posted on the Singclaw or at a date specified by Singclaw. 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. 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 Singclaw from time to time to review the Privacy Policy. Your continued use of the Singclaw and/or the Services signifies your acceptance of the changes to the Privacy Policy.

Where changes are material, we will provide reasonable prior notice (such as via the Services or website).

K. AI FEATURES AND DATA PROCESSING

1. Our Services may include features powered by generative artificial intelligence (“AI Features”), which process user inputs (such as text, prompts, or uploaded content) and generate outputs (such as responses, summaries, or reports).

2. When you use AI Features:

(a) we collect and process the content you submit (“Input”);

(b) we generate and may store the resulting output (“Output”);

(c) such Input and Output may be used to provide and maintain our Services.

3. No Training with User Data. We do not use your Input or Output data to train, develop, or improve our machine learning models or the underlying AI models provided by third-party providers.

4. We may use third-party service providers to support AI Features (such as cloud computing or AI model providers). These providers process data on our behalf and are contractually bound to protect your data and use it only for providing services to us.

5. We may review certain Inputs and Outputs, including through automated or human review, for the purposes of improving service quality, ensuring compliance with our terms, and preventing misuse.

6. We retain Input and Output data only for as long as necessary to fulfill the purposes described in this Privacy Policy, unless a longer retention period is required or permitted by law.