

Privacy Policy

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1. INTRODUCTION

Carnex Digital Pte. Ltd (hereinafter the “**Company**”, “**we**”, “**our**”, or “**us**”) is incorporated in Singapore with Certificate confirming incorporation of Company No. ACRA180829122360.

The Company’s Business office is at 11 North Buona Vista Drive #08-09, The Metropolis Tower 2, Singapore 138589.

The protection of the security and privacy of your Personal Data is important to us and to the way we conduct our business in compliance with the laws on privacy, data protection, and data security.

This Privacy Policy, together with our Terms and Conditions applicable to you and any additional provisions that may be incorporated by reference into the terms apply to your use of our services, our site accessible from <https://carnexdigital.com/> (“Website”), and any of the services accessible through the Website and our products (collectively referred to as “Service”).

The purpose of this Privacy Policy is to outline what information the Company may collect, how it uses and safeguards that information, and with whom we may share it.

2. WHO WE ARE

Carnex Digital Pte. Ltd. is the data controller and is responsible for your Personal Data.

Our full details are as follows:

- Postal address: 11 North Buona Vista Drive #08-09, The Metropolis Tower 2, Singapore 138589
- Email address: legal@carnexdigital.com

3. PERSONAL DATA

3.1. Information We Collect

1. We will collect the following personally identifiable information (“**Personal Data**”):
 - full name (patronymic name if applicable)
 - phone number
 - email
 - IP address, geolocation
 - browser type/version
 - operating system
2. Through its Website (s), the Company will not collect any Personal Data unless you voluntarily choose to provide it (e.g., by filling out the form at website to receive a free quote for search marketing services, etc.). If you do not want your Personal Data to be collected, please do not submit it.
3. We will process your Personal Data legally and fairly and will not use it outside the purposes of which we have informed you, including selling it individually or in the aggregate for commercial use.
4. We retain Personal Data in an identifiable format for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes. We may retain Personal Data for longer periods than required by law if it is in our legitimate business interests and is not directly

prohibited by the applicable law. If your account is deleted, we may take steps to mask Personal Data and other Data, but we reserve our right to retain and access the data for as long as required to comply with applicable laws. We will continue to use and disclose such Personal Data in accordance with this Policy.

5. We also collect, use, and share aggregated data, such as statistical or demographic data, for any purpose (“**Aggregated Data**”). Aggregated Data could be derived from your Personal Data but is not considered Personal Data by the law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific software feature. However, if we combine or connect Aggregated Data with your Personal Data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this Privacy Policy.
6. We do not collect any special categories of Personal Data about you. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, or data about your health.

3.2. How We Acquire Your Data

1. Information may come from the following sources:
 - directly from you (from our communication and/or forms that you filled in)
 - cookies stored in your browser by our Website
 - IP-address
 - other sources, including third parties and publicly available sources
2. We may combine that with information we collect via our services.

3.3. Purposes

We collect Personal Data for the following purposes:

1. to provide the services that you have requested;
2. to respond to your requests, for example, to contact you about a question you submitted to us;
3. to provide the functionality of our products;
4. to inform you about changes in our services, our service offering, and other important service-related notices;
5. to protect our rights and interests, as well as the rights and interests of our users and any other person;
6. to carry out any actions for which we have received your consent;
7. to perform research and analysis about your use of, or interest in, our products, services, or content, or products, services, or content offered by others;
8. to comply with applicable legal or regulatory obligations, including complying with requests from law enforcement or other governmental authorities or in legal proceedings;
9. to fulfill our contractual obligations;
10. to communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Website, and for marketing and promotional purposes;
11. to tailor the Website or other service we provide to you relating to your needs and interests;
12. to create anonymous statistical data;
13. to prevent and investigate fraudulent or other criminal activity.

4. DISCLOSURE OF INFORMATION

4.1. To Whom We Disclose Information

- Your Personal Data may be disclosed to different recipients. The list below provides some of the types of recipients and reasons for sharing your Personal Data.

Category of recipient	Examples or explanation	Share purpose
Our affiliates	Any legal entity affiliated with the Company	<ul style="list-style-type: none"> Providing the basic services under the Terms and Conditions; Organizing the work of customer support service; Any other purpose deemed necessary by the Company.
Financial institutions and other similar organizations	Any such organizations that the Company deals with in the course of its business	<ul style="list-style-type: none"> Providing the basic services under the Terms and Conditions; Complying with our legal obligations imposed by applicable laws (in certain cases provided by law).
Auditors, lawyers, and other examination organizations	Any entity conducting an audit or other legal/financial check	Complying with our legal obligations imposed by applicable laws (in certain cases provided by law).
Third-party service providers whose activities are required to perform the service	Web hosting, information technology providers	Providing the basic services under the Terms and Conditions.
Data aggregation, analytics, and market research services	Google Analytics, Google Ads	<ul style="list-style-type: none"> Creating and utilizing analytics on our services and audience; Conducting advertising and marketing activity; Conducting surveys and research; Personalizing our services for you.
Advertising partners	Any partners	<ul style="list-style-type: none"> Conducting advertising and marketing activity; Personalizing our services for you.
Relevant parties in the event of a change in control, merger, or acquisition		As our business develops, we may sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution, or similar event, Personal Data may be part of the transferred assets.
Authorities and parties where relevant for compliance with various laws	Any authority	Compliance with our legal obligations imposed by applicable laws.

- Please note that we will never sell the Client's Personal Data.
- In general, we require that any third-party service provider that we share any Personal Data with undertakes to respect any individual's right to privacy and comply with the Data Protection Principles. These third-party service providers may keep a record of any searches they performed

on our behalf, and they may use the search details to assist other companies in performing their searches. This Privacy Policy does not cover the practices of third parties.

4.2. Third-Party Sites

Please be notified that Carnex Digital Pte. Ltd cannot be held responsible for the privacy practices of other websites. We advise all visitors to be aware and read the privacy statements of every Website that collects personal identity information.

4.3. International Transfers

1. We operate all over the world, and therefore we may transfer your data to our counterparties (partners, affiliates, etc.) in different countries, including those which are located outside the country in which you are based. We take all necessary steps, including those imposed on us by applicable law, to ensure an adequate level of Personal Data protection in each case. **However**, we would like you to consider that the countries to which we transfer your data may not have the same data protection laws as your jurisdiction.
2. To facilitate our global operations, the Company may transfer, store, and process your operations with our partners and service providers based outside of the country in which you are based. Laws in those countries may differ from the laws applicable to your country of residence. Where we transfer, store, and process your Personal Data outside of the country where you are based, we will ensure that the appropriate safeguards are in place to ensure an adequate level of protection. Further details regarding the relevant safeguards can be obtained from us upon request.

5. CONSENT

1. BY SUBMITTING INFORMATION, INCLUDING PERSONAL DATA, YOU ARE EXPRESSLY AND VOLUNTARILY ACCEPTING THE TERMS AND CONDITIONS OF THIS PRIVACY POLICY. YOU HAVE THE RIGHT TO WITHDRAW YOUR CONSENT AND USE OF YOUR INFORMATION BY CHANGING YOUR ACCOUNT SETTINGS OR CLOSING YOUR ACCOUNT, BUT YOUR WITHDRAWAL OF CONSENT WILL NOT BE RETROACTIVE.
2. You should also be aware that we do not sell, rent, or disclose your Personal Data in exchange for money or other valuable consideration to any third parties, and we shall not incorporate such practice in our business unless providing you with a clear and explicit way to exercise your opt-out right and before introducing appropriate changes to this Policy.
3. You consent to transfer your Personal Data to third parties as described in Section 4.1. of this Privacy Policy, and as described in this Privacy Policy, including to carry out your instructions or to provide our services, for the purpose of notifying a Partner of a client's detachment unless otherwise compelled by law or as necessary to enforce our Terms and Conditions or to protect the rights or property of the Company or its users or the public. We may provide Aggregated Data about the usage of our Services to third parties for purposes that we deem, in our sole discretion, to be appropriate.

Marketing mailings

1. If you provide us with your email address and agree to this Privacy Policy, our partners and we may send you emails regarding the products we offer. You can choose to opt out of receiving emails from us at any time. If you wish to opt out with respect to more than one email address, you must provide a separate request for each email address. Every email sent from us will include appropriate unsubscribe instructions. To opt out of all email marketing messages from us, you can opt out of emails from us at any time by email us.

2. If you provide us with your telephone number and agree to this Privacy Policy, our partners and we may send you texts or call you regarding the products we offer. You can choose to opt out of receiving texts or calls from us at any time by emailing us.

6. YOUR LEGAL RIGHTS

In accordance with applicable law, you may have the right to:

1. **access Personal Data** about you;
2. **request correction** of your **Personal Data** where it is inaccurate, incomplete, or outdated;
3. **request deletion, anonymization, or blocking** of your **Personal Data**;
4. **request restriction of or object to** our processing of your **Personal Data**;
5. **withdraw your consent** to our processing of your **Personal Data**;
6. **request data portability** and receive an electronic copy of **the Personal Data** that you have provided to us;
7. **be informed** about third parties with which your **Personal Data** has been shared;
8. **request the review of decisions** taken exclusively based on automated processing if that could affect data subject rights.

SECURITY

6.1. Retention of Records

1. We may be requested to retain and use your Personal Data to meet our legal obligations for data security purposes and as we believe to be fit and necessary or appropriate for purposes that include, but are not limited to,
 - a. compliance with our requirements under applicable laws and regulations;
 - b. responding to requests from courts and/or other public and governmental authorities;
 - c. monitoring through compliance and anti-money laundering processes.
2. We will not keep your information for any longer than the time required. In many cases, information must be kept for considerable periods of time. Retention periods will be decided, considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing Personal Data, communication, and anything else that is relative to you for a maximum of seven (7) years after the termination of the Agreement between you and our Company. In any event, we will keep your information for a minimum duration as provided in the applicable Limitation of Actions Law.

6.2. Security Measures

1. The Company takes precautions to ensure the security of your Personal Data and strives to keep it accurate.
2. We act with care to protect the Personal Data from loss, destruction, falsification, manipulation, and unauthorized access or unauthorized disclosure. To do so, we have developed and will maintain security procedures to safeguard Personal Data against loss, theft, copying, and unauthorized disclosure, use, and/or modification.
3. Access to Personal Data is limited to the company employees and authorized service providers who require to receive it in order to perform their work.

4. While we will use all reasonable efforts to safeguard the Client's information, the Client acknowledges that the use of the Internet is not entirely secure, and therefore, we cannot provide any guarantee concerning the security or integrity of any Personal Data transferred from or to the Client with the use of the Internet.

7. GENERAL

7.1. Changes to the Privacy Policy

This Privacy Policy may be modified from time to time, thus, check back often. To help you be aware if changes have been made, we will adjust the "Last Revised" date or "Date of publication" at the beginning of this document. The new Policy may be displayed on-screen, and you may be required to read it to continue using the Service, Product, or Website. Continued use of our products and services by you will constitute your acceptance of any changes or revisions to this Policy.

7.2. Compliance with Applicable Legislation

We are committed to complying with applicable privacy and data protection laws and regulations designed to protect your Personal Data, including the Data Protection Bill, 2021, and other applicable current or future regional and state privacy and data protection laws and regulations worldwide as they become effective.

7.3. Prevailing Language

This document, as well as the Company's other legally-binding documents, is drawn up in English. Any other version is provided as a translation. In the event of a conflict between the translation and English versions, the English version will prevail.

7.4. Questions, Problems, or Complaints

1. You can contact us at legal@carnexdigital.com you have any questions, problems, or complaints regarding this Privacy Policy.