

# Privacy Policy

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## Privacy Agreement

The Privacy Agreement applies to Sport & Fashion Management Pte. Ltd. (the “Company”, “Sportmaster”, “Our”, “We”) service to you. We will collect personal information from you as appropriate and necessary in accordance with laws and regulations. We will do our best to protect your information from disclosure, damage, or missing through reasonable and effective information security techniques and management processes and corresponding security protection measures. We hope to clarify how we are committed to protecting your personal information through the following Privacy Agreement.

Please read the Privacy Agreement in its entirety. If you have any questions about the Privacy Agreement, you can contact us via the email address provided herein.

By using or continuing to use our products and services, you agree to the content of the Privacy Agreement. If you do not agree to any of the Privacy Agreement, please stop using our services immediately.

## 1 Personal information Collection

### 1.1 Definition of personal information

Personal information refers to any information relating to an identified or identifiable natural person. In other words, personal information is any information that allows us to identify you directly or indirectly.

In the Privacy Agreement, we also use "data" to represent personal information.

### 1.2 Circumstances of personal information collection

We may collect your personal information under the following circumstances:

- When you register as our user;
- When you buy our product;
- When you sign up or join our event;
- When you use our services and products;

### 1.3 Scope of personal information collection

We may handle all types of personal information, including the data clearly provided by you and your device data and personal information generated from the use of our services, specifically:

- When you register or log in, we may collect your email address, password, nickname, and profile photo that you use in registration.
- When you download or use the app, we may read information about your mobile device, such as information of the hardware model, IMEI number or other unique device identifier, MAC address, IP address, operating system version, and location. We may also read information about the use of your appliances through the Internet of Things (IoT) app, such as the device model, operating status, frequency of usage, and the use of cameras built into the device. We may also receive and record information about your conversations, audios, videos, pictures, etc. in voice interaction with IoT devices.
- When you use bonded and controlled devices, we may collect the information of device model, IP address, location, and device status. We collect your current location information, not track your whereabouts, open the location service can directly obtain your location information to provide you with services, such as weather service, intelligent scene service, network function.

- When you use an Internet of Things (IoT) device, we may collect information that you communicate during the voice service interaction, including the recordings of your voice commands (such as your questions, requests, and instructions), and information that you receive from the service (such as responses, answers, and content).
- When you use an IoT device, you can view the real-time and historical video footage captured by the camera through the software. You can also save the video locally. In order to enable the said function, we may send all videos captured by the camera to your app in an encrypted manner. We will neither store your video footage on our server nor use it for any other purpose or share it with any third party.
- When you use a product or service, we may automatically receive and record information about your browser and computer or App client, such as your IP address, browser type, language used, and access date and time, hardware and software feature information and web page records you need; when you apply for after-sales service, we may also collect your phone number and address.
- To help us understand the operation of M-smart App, we may use the mobile analysis software SDK. We may record information of your frequency of usage data, corrupted data, overall usage data, performance data, etc. We will not associate information stored in the analysis software with any of your personal information.
- It is important to note that separate device information or service log information cannot identify a particular natural person. If we combine such non-personal information with other information to identify a particular natural person or use it in conjunction with personal information, such non-personal information will be treated as personal information during the period combined use, and we will de-identify such information unless we have your authorization or unless otherwise stipulated. As mentioned above, we may store your account information in the database so that you can get your personal data every time you visit our website and use our App or other services. Your data will be stored in our server as log files and used for analysis and research. After being processed in the server, your data will be transmitted to the database. We will back up data on a regular basis to prevent data loss due to server failure or human error, and will delete them immediately at your request.

## 2 Data Processing

### 2.1 Our role

We are the controller of your information.

### 2.2 Legal foundation

We process your data for the following one or more purposes:

- When we have your consent;
- When it requested for the purpose of marketing;
- When it requested for the purpose of performing the contract we enter into with you;
- When it is legally obligated;
- When it is within our legal rights or interests. For example, to implement our policies, manage day-to-day business, aggregate data for data analysis, maintain information security, or prevent frauds, or, if necessary, we transfer the data to other BUs of our company).

### 2.3 Reasons for providing your personal information

Generally, your consent constitutes the legal foundation for us to handle your information. It is therefore necessary for you to agree with our user agreement and Privacy Agreement for our agreement to be formulated and performed and our legal rights and interests to be protected.

You have the right to choose whether to provide the relevant data. We may not be able to undertake part or all of the obligations according to the service terms or provide our services without some of your information. If you wish to learn more, please contact our data protection office using the contact details under the last section of this Privacy Agreement.

### 2.4 Purposes and methods

We will use information provided by you and collected by us in the process of services to offer you our services. We will not use your data for any other purposes that do not fit the purposes for data collection that are detailed below.

We will use your information for the following purposes in the following manners:

- To verify your identity to prevent unauthorized access;
- To offer our services or products according to the contract we enter into;
- To offer other services you request according to the requirements stated during data collection;
- To process transactions and communicate with you regarding the details of such transactions;
- To help track and fix any fault or error in the application;
- To conduct internal audit, data analysis or research to the end of improving our products and services through evaluating our efficiency;
- To share your information with our partners so that they can assist us in offering our products and services to you;
- To share your information with other branch institutions for internal management and background support;
- To maintain the integrity and security of the information system where we store and process your information;
- To scrutinize and investigate into data leaks, illegal activities and fraudulent behaviors;
- To comply with applicable laws and regulations or the demand for your information requested for litigation and other legal proceedings or imposed by governmental authorities.

### **3 Device authorizations**

We occasionally demand authorizations to access, including but not limited to, your storage, contacts, notifications, GPS locations, cameras, Bluetooth, NFC when providing services. You may deny the access to relevant personal information by turning off part or all of the authorizations in device settings. The authorization management process is different in different devices. Please refer to the relevant instructions for accessing the device settings and the system developer mode.

### **4 Sharing, transfer or disclosure of your information**

#### **4.1 Sharing of your information**

Your personal information will be kept strictly confidential and will not be shared with any other company, organization, or individual, except in the following circumstances:

- When we have obtained your clear consent to share your information with a third party.
- When we share your information with our staff members or the branch institutions of our company across the world only in order to: provide further services; carry out internal management; scrutinize for or handle data leaks, illegal activities, or frauds; to maintain the integrity of the company's IT system. We share only necessary information with our staff members within the minimal scope, which are subject to this Privacy Agreement. We sign non-disclosure agreements (NDAs) with the authorized staff members.
- When we share your personal information with a third-party service provider (or partner) for the benefit of offering or improving our services including but not limited to cloud services, video surveillance services, IT supports, custom services. We sign rigorous data handling agreements with all relevant third-party service providers (or partners) which requires them to take certain security measures in handling your information pursuant to the relevant laws and regulations and our requirements to safeguard your data security.
- When we disclose your information under the demands of the laws and regulations or government authorities.

#### **4.2 Transfer of your information**

We will not transfer your information to any other company, organization, or individual except under any of the following circumstances:

- Transfer under clear consent: when we have obtained your clear consent, we will transfer your information to a third party.
- In the case of merger, acquisition, or bankrupt clearance, we will demand the new company or organization now in possession of your personal information to continue be bound by this Privacy Agreement. We will demand the company or organization to obtain your new consent otherwise.

#### 4.3 Disclosure of your information

We will only disclose your information under the following circumstances:

- When we have obtained your clear consent;
- When the law, legal proceedings including litigation, or government authorities, demand so.

### 5 Limitation period for saving your information

We will continue to save your information so long as for purposes specified in this Privacy Agreement, and within any additional period as required or permitted by law, until you withdraw the consent.

Whereas, we may postpone the retention of your information for research or statistics, but we will desensitize your information from tracking you.

At the same time, in accordance with the law of the country in which you live, we may retain your personal information to assist in any government and judicial investigations for the purpose of submitting or maintaining legal requests or civil, criminal or administrative procedures. If the above reasons fail to apply to the data we preserve, we shall delete and destroy your data in a secure manner in accordance with the relevant requirements.

### 6 Protection of information of people under legal age

Our products and services shall be primarily for adults, yet, we shall be aware of the importance of taking extra precautions to guarantee the privacy and security of people under legal age who use the products and accept the services. We consider anyone who is under the age of 16 (or the age as required by the local law) a person under legal age.

We will only use or disclose the personal information of people under legal age collected with the consent of the guardian on the condition that the law permits, the guardian expressly consents or the protection of the people under legal age is necessary. At any time, the guardian who asks to access to, modify or delete personal information of the person under guardianship shall contact us as described in Section 13.

If we are found to collect personal information of people under legal age without firstly obtaining the consent of a verifiable guardian, we shall try to remove the relevant content as soon as possible.

### 7 Measures for information protection

We adhere to recognized key data protection principles (fairness, purpose limitation, data quality, data retention, compliance with individual rights, and security), and take reasonable measures to guarantee the security of your personal information. We have applied a range of techniques to guarantee the security of your personal information to minimize the risk of misuse, unauthorized access, unauthorized disclosure and inaccessibility. Security measures we have adopted include but are not limited to: data desensitization, data encryption, and authorization control of firewalls and data access.

We will continue to save your information so long as for purposes specified in this Privacy Agreement, and within any additional period as required or permitted by law, until you withdraw the consent.

Whereas, we may postpone the retention of your information for research or statistics, but we will desensitize your information from tracking you.

At the same time, in accordance with the law of the country in which you live, we may retain your personal information to assist in any government and judicial investigations for the purpose of submitting or maintaining legal requests or civil, criminal or administrative procedures. If the above reasons fail to apply to the data we preserve, we shall delete and destroy your data in a secure manner in accordance with the relevant requirements.

In addition, we shall regularly check and update the security mechanisms used to protect data in order to provide effective protection against data misuse. If you believe that the security of your data has been compromised, or you would like to know more information about the measures we adopt to

protect data, please contact the Data Protection Office through the contact method provided in the last section.

## **8 Storage of personal information**

As our business span across the globe, based on the consideration of data storage security, we will store synchronously all the information we collect from you in our servers in Germany and the United States and/or any other country designated by us which shall be updated and reflected in this Agreement from time to time..

## **9 Cross-border transmissions of personal information**

We are a multinational company and the responsibility range of our teams responsible for data processing may cover the world or a variety of countries/regions. Therefore, these teams may be located anywhere in the world where we conduct business, including outside the EU, in countries that do not pursue the same standards for personal information protection as your country. We may also transmit data outside the EU, including Russia. By using or joining our services and/or providing us with your information, you agree that we will collect, transmit, store and process your information outside the country/region you live in accordance with this Privacy Policy. We will make every effort to ensure that they comply with applicable legal requirements to the extent permitted by existing technology, for example, by executing standard contract terms. All of your data that we collect is used for user and product analysis after necessary confidential processing to provide you with better services. But in this case, we will take steps to protect your information appropriately.

## **10 User portraits and automated decision**

To provide you with more convenient and personalized information display, search, and push services when you use our services, we may extract your preferences based on your purchase information and service log information, and produce an indirect portraits based on feature labels for display, information push, and possible commercial advertising.

We may analyze processed data that fail to identify you to improve our products and services.

We will not use your data to conduct any fully automated decision.

## **11 Personal information rights and their exercising**

### **11.1 The personal information rights you have**

- Access: demand to provide a copy of the personal information we hold about you;
- Correct: demand to correct the information containing errors or the expired information;
- Logout and Cancel: demand to cancel your account or delete your personal information;
- Carry: demand to provide your data and, if possible, to transfer the data directly to another data controller;
- Restrict: demand to limit the processing for any dispute on the accuracy or legality of our processing of personal information; yet, the right on processing may cause you to be unable to accept our services normally;
- Refuse: oppose to use your personal information for user portraits and automatic decision-making, and oppose to send commercial information for direct marketing by using your personal information;
- Lodge a complaint: lodge a complaint on the processing of your data with the competent authority of your residence or the member of the European Union that processes your data;
- Agree to withdraw: withdraw the consent at any time when we rely on your consent to process the data.

### **11.2 Methods of exercising personal information rights**

We will protect your right to access and correct your personal information. If you wish to exercise any of the rights described in Article 11.1, you may send e-mail to our Data Protection Office for processing.

As we receive a large amount of commercial promotion e-mails every day, we shall not respond if we believe that your e-mails are not related to personal information.

### 11.3 Results of request

After the request is made by the subject of personal information, the following results may occur:

#### (1) Request denied

In some cases, requests from personal information subjects shall be rejected, including but not limited to:

- The subject of personal information is not granted relevant rights by laws of where you live;
- The identity of the person making the request fails to be verified;
- The request made by the subject of personal information fails to be verified and is beyond scope, especially when the request is repeated;
- The disclosure of information is prone to harm the interests of the relevant parties if the information involved is related to the damage or compensation received in the dispute;
- The information shall be retained for statistics and research, and the results of statistics and research shall not reveal personal identities;
- Other legally prescribed circumstances.

If the access request of the subject of personal information is rejected, we shall formally explain the reason to the requester.

#### (2) Request accepted

If there is no circumstance as specified in (1), we shall process the request. If you really want the request to be accepted, please provide us with as much detailed information as possible when requesting, such as the request type and specific content, information about the holder (such as the name of the product and service you use), and time for generating or processing information (if the time could be as exact as possible, the request may be accepted).

### 11.4 Withdraw consent

You may change the scope of your authorization to continue to collect personal information or withdraw your authorization by deleting the configuration information, removing binding the associated device, and canceling the account number.

Please understand that the service of business function shall require some basic personal information (registration e-mail) to be completed, so if you withdraw your consent or authorization, we will stop providing the service corresponding to the withdrawal of consent or authorization. Yet, your decision to withdraw your consent or authorization shall not affect the processing of personal information previously based on your authorization.

## 12 Change of Privacy Agreement

We shall reserve the right to modify the Privacy Agreement. Without your express consent, we shall not reduce your rights in accordance with the Privacy Agreement. Any change to the Privacy Agreement shall be posted on this page. For major changes, we shall provide more obvious notice (for certain services, we shall send an e-mail notification to state the specific changes to the Privacy Agreement.)

Major changes referred to herein include but are not limited to:

- Major change of our service model, such as the purpose of processing personal information, and the type of personal information under processing, the way of using personal information;
- Major change of our ownership structure, organizational structure, etc., such as owner change caused by business adjustments, bankruptcy mergers, etc.;
- Main subject change of public disclosure of personal information;
- Major change of your right to participate in the processing of personal information and the corresponding exercising methods;
- Change of the department responsible for processing the security of personal information, or change of contact information and complaint receiving channels;

- A high risk shown in the assessment report of personal information security impact.  
At the same time, we shall archive the former version of this Privacy Agreement for your reference.

### **13 Contact Us**

If you have any questions about this Privacy Agreement or you wish to exercise any right, or you have any requests to discuss with us, please send an email to our Data Protection Office specially established at the following address: DPO@sfm.sg. Upon receiving your request, we shall make every effort to respond within one month of the request from the subject of personal information for the access. Your patience and understanding are highly appreciated. Given the complexity and quantity of requirements, the period may be extended for another 45 days as necessary. In case of deferred response, we shall inform the subject of the personal information and the reasons for the delay. If the limitation period set in this paragraph conflicts with the local laws, the local laws shall prevail.

If you disagree with us about our processing of your personal information, you may submit a mediation request or other requests to data protection regulator where you are located.