

HelloHolo Pte. Ltd.  
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ACRA Reg No: 202001447K



## **PRIVACY POLICY**

HelloHolo Pte Ltd, Axension Studios LLP and its affiliates or partners (collectively referred to as “we”, “us”, or “our”) is dedicated to protecting privacy rights of our users (“users” or “you”). If you have any questions or concerns about our notice, or our practices with regards to your personal information, please contact us with the information provided in the Contact Information Section of this Policy.

When you visit our mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy notice that you do not agree with, please discontinue use of our Apps and our services.

This privacy notice applies to all information collected through our mobile application, (“Apps”), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy notice as the “Services”).

**Please read this privacy notice carefully as it will help you make informed decisions about sharing your personal information with us.**

### **What information do we collect?**

We automatically collect certain information when you visit, use or navigate the Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Apps and other technical information. This information is primarily needed to maintain the security and operation of our Apps, and for our internal analytics and reporting purposes.

*Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's camera, photo/video library, and other features. If you wish to change our access or permissions, you may do so in your device's settings.

*Mobile Device Data.* We may automatically collect device information (such as your mobile device ID, model and manufacturer), operating system, version information and IP address.

### **How do we use your information?**

We use personal information collected via our Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests, in order to enter into or perform a contract with you, with your consent, and/or for compliance with our legal obligations. We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

*To protect our Services.* We may use your information as part of our efforts to keep our Apps safe and secure (for example, for fraud monitoring and prevention).

*To deliver Services to the user.* We may use your information to provide you with the requested service.

*For other Business Purposes.* We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Apps, products, marketing and your experience. We may use and store this information in aggregated and anonymized form so that it is not associated with individual end users and does not include personal information. We will not use identifiable personal information without your consent.

### **Will your information be shared with anyone?**

We may process or share data based on the following legal basis:

**Consent:** We may process your data if you have given us specific consent to use your personal information in a specific purpose.

**Legitimate Interests:** We may process your data when it is reasonably necessary to achieve our legitimate business interests.

**Performance of a Contract:** Where we have entered into a contract with you, we may process your personal information to fulfil the terms of our contract.

**Legal Obligations:** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).

Vital Interests: We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved. More specifically, we may need to process your data or share your personal information in the following situations:

Vendors, Consultants and Other Third-Party Service Providers. We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data analysis, email delivery, hosting services, customer service and marketing efforts. We may allow selected third parties to use tracking technology on the Apps, which will enable them to collect data about how you interact with the Apps over time. This information may be used to, among other things, analyse and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

Third-Party Advertisers. We may use third-party advertising companies to serve ads when you visit the Apps. These companies may use information about your visits to our Website(s) and other websites that are contained in web cookies and other tracking technologies in order to provide advertisements about goods and services of interest to you.

### **How long do we keep your information?**

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy notice, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 1 year.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible

### **How do we keep your information safe?**

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Apps is at your own risk. You should only access the services within a secure environment.

## **Do we collect information from children?**

We do not knowingly collect personally identifiable information from children under 13 years of age. By using the Apps, you represent that you are at least 13 or that you are the parent or guardian of the child and consent to such dependent use of the application. In the case that we discover that personal information from users less than 13 years of age has been collected, we will deactivate the account and take reasonable measures to promptly delete such data from our records. If you become aware of any data we have collected from children under age 13, please contact us at [dpo@helloholo.sg](mailto:dpo@helloholo.sg).

## **Data Protection Officer**

You may contact our Data Protection Officer if you have any enquiries or feedback on our policies and procedures, or if you wish to make any request, in the following manner:

Name of DPO : **Tan Ka Kit Amanda**  
Contact No. : **+65 84289468**  
Email Address : [dpo@axensionstudios.com](mailto:dpo@axensionstudios.com) or [dpo@helloholo.sg](mailto:dpo@helloholo.sg)

## **Effect of Policy and Changes to Policy**

This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 23 December 2020  
Last updated : 23 December 2020