

Privacy Policy of Kreate Pte. Ltd.

Policy last updated: 2023 April 24

Kreate respects your privacy and is fully committed to protecting and using your personal information correctly and in compliance with data privacy laws.

This Privacy Policy applies to our website, <https://kreate.community/>, and our Kreate mobile applications (collectively, the “**Kreate Platform**”). This Privacy Policy explains what information we collect and use about each of our Account holders and non-account holders (such as Platform visitors) through the Platform, how we use that information, and what choices to have concerning the information we collect about you. The platform and our services are available through the Platform are collectively called the “**Services**”.

Please take a few moments to read this Privacy Policy **before you access or use the Services**. By using or accessing the Kreate Platform, you acknowledge that you have read and fully understood this Privacy Policy and our Terms of Service and that they both apply to your use of the Services. Please only use the Platform or Services if you read and fully understand this Privacy Policy. This Privacy Policy is not intended to override the terms of any contract you have with us nor any rights you might have under applicable data privacy laws. The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, accessible at <https://kreate.community/> unless otherwise defined in this Privacy Policy. If you have read this policy but want further clarification, please contact us at hello@kreate.community.

1. What information do we collect?

To provide you with the Services, we may collect personal information about an identified or identifiable natural person (“**Information**”).

We collect Information to provide, operate, and improve our Platform and Services, to administer your use of the Platform or Services (including your Account, as defined below), and to enable you to enjoy and easily navigate our Platform and Services. Additionally, we collect your information, amongst other reasons stated below, to provide you with ongoing customer assistance and technical support and to enhance our data security and fraud prevention

capabilities. We will not use or share your information with service providers and others (or otherwise allow them access) except as described in this Privacy Policy.

1.1 Information you provide us:

When you register for our services and create a Kreate account via the Kreate Platform (an “**Account**”), when you register for special services, sign up for an e-mail newsletter and purchase products or services, we collect certain information that you include in your communications with us, such as your name, age/ date of birth, postal address, telephone number, e-mail address, details regarding connected third-party accounts (such as the e-mail or username for a connected PayPal or Google account), credit card information (if you use certain features and services).

Create your account using your login credential from a third-party site or service. We can collect your name, email address, and other data that your privacy settings permit us to access on that third-party site or service. We do not receive or store passwords for those third-party sites and services.

1.2 Information collected through your use of the Platform or Services.

When you are visiting or using our Platform or Services, including when you browse the Platform on a User Account, edit your Account and upload information and content, and download and use the Platform feature or service, we know it. We will usually gather, collect, and record such uses, sessions, and related information, either independently or with the help of third-party services as detailed herein, including through the use of “cookies” and other tracking technologies. As further detailed below.

Our servers automatically collect and record certain information about how a person uses our Services (we refer to this information as “Log Data”) for both Account holders and non-account holders (such as Site visitors) (both will be referred to as “User”). Log Data may include information such as a User’s Internet Protocol (IP) address, mobile device identifier, browser type and version, operating system, the pages or features of our Services to which a User browsed and the time spent on those pages or features, search terms, the links on our Services

on which a User clicked, the friends of Account holders who also use the Services, purchases made by the User, which content is engaged with most frequently, and which areas of our Platform are the most popular and other statistics. We also collect certain information your mobile device sends when you use our Services, including user settings, the operating system, and information about your use. We use this information to administer the Services and analyse (and may engage third parties to analyse) this information to develop further, improve and enhance the Services by expanding their features and functionality and tailoring them to our Users' needs and preferences to make recommendations.

1.3 Information we collect from other sources.

Create your Account using your login credentials from a third-party site or service. We'll be able to access and collect your name and email address, and other data that your privacy settings on that third-party site or service permit us to access, but we never receive or store passwords for those third-party sites and services. We cannot delete or change any information stored on third-party sites and services.

In addition, We may receive information about you from third-party sources, such as (i) security providers and fraud detection and prevention providers to help us screen out Users associated with the fraud.

2. How do we use such information?

2.1. We use your information for the following purposes: to provide and operate the Services; to enhance our data security and fraud prevention capabilities; To create aggregated statistical data and other aggregated and inferred information, which we may use to provide and improve our respective Services; to customise advertising and content available on the Kreate Platform, to send you service-related notices and promotional information about products and services that may be of interest to you and to conduct research for internal purposes; to help us in updating, expanding and analysing our records to identify new Users; to facilitate, sponsor, and offer specific contests, events, and promotions, monitor performance, contact winners, and grant prizes and benefits; and to comply with any applicable laws and regulations.

2.2. We will only use your Information for the purposes set out in Section 2, where you give us your permission, and we are satisfied that:

a. our use of your Information is necessary to perform a contract or take steps to enter into a contract with you (e.g. to provide you with Services, to provide you with our customer assistance and technical support), or

b. our use of your Information is necessary to comply with a relevant legal or regulatory obligation that we have, or

c. our use of your Information is necessary to support legitimate interests that we have as a business (for example, to maintain and improve our Services by identifying user trends and the effectiveness of our promotional campaigns and identifying technical issues), provided it is proportionately conducted at all times, and that respects your privacy rights.

3. How do we share your information?

We may share your information with service providers and others (or otherwise allow them access to it) in the following manners and instances:

3.1. *Third-Party Service Providers:* We may share information and aggregated information that we collect with third-party service providers whose services and solutions complement, facilitate and enhance our own. These include but are not limited to hosting and server co-location services, communications and content delivery networks (CDNs), data and cyber security services, billing and payment processing services, fraud detection and prevention services, industry analysis, web analytics, e-mail distribution and monitoring services, session recording and remote access services, performance measurement, data optimisation and marketing services, content providers, and our legal and financial advisors (collectively, “**Third Party Services**”).

3.1.1. We may share information with Third Party Services for business purposes, such as identifiers, commercial information and other categories listed in Section 1.

3.2. *Information Disclosed for Our Protection and the Protection of Others.* Where permitted by local data protection laws, we will disclose Information when required by law or under the good-faith belief that such disclosure is necessary to conform to applicable law, comply with subpoenas, court orders or legal processes served on Kreate, to establish or exercise our legal rights or defend against legal claims, and to protect the property or interests of Kreate, its agents and employees, personal safety, or the public. Under these circumstances, Kreate may be prohibited by law, court order or other legal processes from providing notice of the disclosure. Kreate reserves the right not to provide information in its sole discretion under those conditions.

3.3. APIs. We offer APIs for third parties to access various features of our Services and content on our Sites. Some APIs will be used by third parties to access and use your Information with the third parties' services; however, your information will not be accessed and used by a third-party API user without your consent. We also offer APIs to some of our third-party service providers to assist with providing services to us, such as, but not limited to, payment processing services. Those third-party API users will access and use your Information only to provide services to us for you, as noted above under "*Third-Party Service Providers*".

3.4. Information We Disclose with Your Consent or at Your Request. We will share your Information with third-party websites or platforms, such as social networking sites, only if you have expressly requested that we do so.

3.5. Social Media Features and Framed Pages: Our Services include certain Social Media features and widgets, such as the "Facebook Like" button, the "Share this" button or other interactive mini-programs ("Social Media Features"). These Social Media Features may collect information such as your IP address or which page you visit on our Sites and may set a cookie to enable them to function correctly. Social Media Features are hosted by a third party or directly on our Services. Your interactions with these third parties' Social Media Features are governed by their policies, not ours.

To avoid doubt, we may share your Information in manners other than as described above, under your explicit approval, or if we are legally obligated to do so.

4. Where do we store your information?

Information of Account holders and non-account holders may be maintained, processed and stored by us and our authorised affiliates and service providers in Singapore and other jurisdictions as necessary for the proper delivery of our Services and as may be required by law.

5. Use of Cookies and Similar Technologies

5.1. Interacting with Cookies

A cookie is a small file of letters and numbers downloaded onto your computer when you access certain websites. In general, cookies allow a website to recognise a user's computer. The most important thing to know about cookies placed by Kreate is that they make our Platform more user-friendly; for example, by remembering site preferences and language settings.

You can either accept or refuse these cookies and know when a cookie is being downloaded to your computer. It is also possible to stop your browser from taking cookies altogether by

changing your browser's cookie settings. Usually, these settings are in your browser's "options" or "preferences" menu.

Please note that deleting our cookies or disabling future cookies or tracking technologies may prevent you from accessing certain areas or features of our Services or may otherwise adversely affect your user experience.

5.2. Cookies are divided into two types:

5.2.1. "First-party cookies": Cookies that Kreate places

5.2.2. "Third-party cookies": Cookies that are placed and used by Third-Party Service Providers

5.3. We also use other technologies with similar functionality to cookies, such as web beacons, pixels, and tracking URLs, to obtain Log Data (as described in the Privacy Policy). For example, our email messages may contain web beacons and tracking URLs to determine whether you have opened a specific message or accessed a particular link.

5.4. Duration

Depending on their function, Cookies may have different durations. There are session cookies and persistent cookies:

5.4.1. Session cookies only last for your online session. It means that the browser deletes these cookies once you close your browser.

5.4.2. Persistent cookies stay on your device after the browser has been closed and last for the period specified in the cookie.

5.5. Categories: The cookies used on our website fall into one of four categories: Essential, Analytics, Functional and Marketing.

5.5.1. Essential Cookies let you move around the website and use essential features like secure and private areas.

5.5.2. Analytics cookies let us understand how you use our website (e.g. which pages you visit and if you experience any errors). These cookies are essential to us being able to enhance and maintain our Platform.

5.5.3. Functional cookies are used to remember user choices to improve their experience.

5.5.4. Marketing cookies are used to collect information about the impact of our marketing campaigns performed on other websites on users and non-users. These cookies are only used on Kreate under *kreate.community

6. Security

6.1. We have implemented security measures designed to protect the Information you share with us, including physical, electronic and procedural measures. Amongst other things, we offer HTTPS secure access to most areas of our Services; the transmission of sensitive payment information through our designated purchase forms is protected by an industry-standard SSL/TLS encrypted connection. We also regularly monitor our systems for possible vulnerabilities and attacks and seek new ways and Third-Party Services for further enhancing the security of our Services and protection of our visitors' and Users' privacy.

6.2. Regardless of the measures and efforts, we can not guarantee the absolute protection and security of your Information, or any other content you upload, publish or otherwise share with us or anyone else. Therefore, we encourage you to set strong passwords for your User Account and avoid providing us or anyone with any sensitive information you believe its disclosure could cause you substantial or irreparable harm.

6.3. If you have any questions regarding the security of our Services, you are more than welcome to contact us at hello@kreate.community.

7. Third-Party Websites

Our Services may contain links to other websites or services. We have no control over and therefore are not responsible for such websites or services' privacy practices. We encourage you to be aware when you leave our Services and to read the privacy statements of every website and service you visit before providing your information. This Privacy Policy does not apply to such linked third-party websites and services, subject only to third-party policies.

8. Your Profile Page

8.1. Please note that when you create an Account, your profile page will display your Account username and specific statistics regarding your use of the Services, including but not limited to the date you became an Account holder, the categories of materials you posted, and how long ago you last visited the Platform. It will also display information about the Account holders who visit your profile page, including the names of those Account holders who Follow you (if the Account holder has permitted such display) and the number of visitors to and views of your profile page or pages containing the content you have submitted.

8.2. Any information or content that you post to your profile page will be publicly accessible by Users, so please exercise good judgment before you post. The name you choose when creating your Account is visible to all Services users. If you visit another Account holder's profile page, your user name will appear. Kreate does not control and is not responsible for using any information or content you have exposed to the public through your use of the Services. You may use the tools we make available via the Services to decide what information about you, including Information that will be visible on your profile page and the profile pages of other Account holders you visit. Note that in some cases, we may be unable to remove your Information from such areas.

9. Children's Privacy

Our Services are not intended for anyone under the age of 13. We do not knowingly collect personally identifiable information from children under 13. If we discover a child under 13 has provided us with personal information, we immediately delete this from our servers. If you are a parent or guardian and know that your child has provided us with personal information, please contact us so we can act accordingly.

10. Changes to This Privacy Policy

10.1. We may update this Privacy Policy as required by applicable law and to reflect changes to our information collection, usage and storage practices. About any updated Privacy Policy, we will, as required by applicable law, notify you, seek your consent and take any other measures.

These changes are effective immediately after they are posted on this page. Please periodically review this page for the latest information on our privacy practices.

10.2. Any heading, caption or section title contained herein and any explanation is provided only for convenience and in no way defines or explains any section or provision hereof or legally binds any of us in any way.

11. Contacting Us

If you have any questions about this Privacy Policy or our policies or wish to exercise your rights as described, please do not hesitate to contact us via hello@kreate.community.