

Assaia Privacy Policy

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1. Types of Personal Information we process and why

The types of Personal Information that we may process in connection with the provision of our Services and via our Websites may be provided by you voluntarily; collected automatically on our Websites (e.g. by using cookies or other online technologies); or provided to us by or collected on behalf of third parties (e.g. by one of our business clients) in order for us to perform our Services for them.

"Personal Information" means data which allows the identification of a natural person directly or indirectly from that data. Examples may include name, address, email, telephone number, customer ID, or tax ID. It includes personal data as defined under EU law.

(i) Information provided voluntarily by users of our Websites

Registration

In order to use certain areas of our Websites, you may need to complete the registration form and create a username and password or your employer may do so on your behalf. During registration, you are required to give contact details such as your name and email address. We use these contact details to contact you about the services described on our Websites in which you have expressed interest or related to the solution you are using.

Assaia is the sole owner of the information collected on our Websites (Assaia.com or other Assaia owned/controlled Websites).

You can email privacy@assaia.com at any time if you no longer wish to be registered with us.

Provision of information

Any Personal Information that you provide through our Websites will be used for the purpose of providing you with information about Assaia and its products and services. Such information will be sent to you using the contact details you have submitted via these Websites.

Surveys or contests

From time to time, we may provide you with the opportunity to participate in contests or surveys on our Websites. If you wish to participate, we will request certain Personal Information from you. Participation in these surveys or contests is completely voluntary and you can choose whether or not to provide such Personal Information. The

requested Personal Information typically includes contact information and demographic information. We use this information to further understand our market and your requirements.

Product offers and updates

If you have registered on our Websites, we will occasionally send you information on Assaia's products and services. If you no longer wish to receive these types of communications, you may unsubscribe by following the instructions in section 8 below.

Newsletters

If you wish to subscribe to our newsletter(s), we will use your contact information, e.g. your name and email address to send the newsletter to you. If you no longer wish to receive our newsletters, you may unsubscribe by following the instructions in section 8 below.

Service-related announcements

We will send you strictly service-related announcements on rare occasions when it is necessary to do so. For instance, if our service is temporarily suspended for maintenance, we might send you an email.

Customer service

Based upon the Personal Information you provide us, we will send you a welcome email. We will also communicate with you in response to your enquiries, to provide the services you request, and to manage your account. We will communicate with you by email or telephone.

User/registration profile

We store information that we collect through log files to create a (registration) "profile" of your preferences. We tie your Personal Information, e.g. your engagement (which pages visited) history, to information in the (registration) profile in order to provide tailored promotions and marketing offers and to improve the content of the Websites for you.

To update or change your profile, please check the profile section of the Websites. See also Section 8 which makes available a link to the Preference Center to make such changes. To delete your profile, email privacy@assaia.com.

(ii) Information collected automatically on our Websites

Cookies and similar technology

To provide you with better website functionality, Assaia uses cookies on its Websites. Cookies are alphanumeric identifiers that are transferred to your computer's hard drive through your Web browser. When this information is stored on your hard drive, our system is able to recognize your browser and automatically log you in where appropriate.

We also store or gather other information automatically and may store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and navigation data.

Cookies and similar technologies are used by Assaia so that we can make it easier for you to access our Websites, to understand usage and for other purposes.

For more information on the types of cookies and similar technologies we use and why and how you can control them. Our Cookie Policy can be found at www.assaia.com.

2. Legal Basis

If you are from the European Economic Area, there needs to be a legal basis for the collection and use of the Personal Information described above. This will depend on the Personal Information concerned and the specific context in which the information is collected. We sometimes process Personal Information because we are providing a service to one of our partners and in those circumstances, it will be our partners' responsibility to ensure a legal basis exists.

However, when it is our responsibility to do so, we will normally collect Personal Information about you only (i) where we need the Personal Information to perform a contract, (ii) where the processing is in our legitimate interests and not overridden by your rights, (iii) where we have your consent to do so, or (iv) where we are otherwise authorized under applicable law. In some cases, we may also have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person.

If we ask you to provide Personal Information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your Personal Information is mandatory or not (as well as of the possible consequences if you do not provide your Personal Information).

If we collect and use your Personal Information in reliance on our legitimate interests (or those of any third party), this interest will normally be to operate our Website or provide our Services and for our legitimate commercial interest, for instance, when responding to your queries, improving our platform, undertaking marketing, or for the purposes of detecting or preventing illegal activities.

3. Personal information sharing and disclosure

Except as provided in this Privacy Statement, we will not share, sell, license, trade or rent any Personal Information to or with any third party without your consent.

We will share your personal data in the following ways:

- Third-party service providers, agents and distributors ("Service Providers"): We may share your information with our service providers who process Personal Information to provide services to us or on our behalf (e.g., to assist us with the functioning of our Websites). We have contracts with our service providers that prohibit them from sharing the personal data about individuals that they collect or that we provide to them with anyone else, or using it for other purposes.

- Group entities: We may share your personal data with other subsidiaries, affiliate companies or agents of the Assaia group of entities for the purposes explained above.
- Fraud prevention: We may disclose the personal data we collect about individuals when we believe disclosure is necessary to investigate, prevent, or respond to suspected illegal or fraudulent activity or to protect the safety, rights, or property of us, individuals, or others.
- Law enforcement purposes: If requested or required by government authorities, such as law enforcement authorities, courts, or regulators, or otherwise to comply with the law, we may disclose any information we have about individuals. We also may disclose information collected about an individual in order to exercise or protect legal rights or defend against legal claims.
- Sale or merger of our business: We may transfer your personal data to a third party if we or any of our affiliates are involved in an actual or potential corporate restructuring (e.g., a sale, merger, or other transfer of assets).
- Advertisers and advertising networks: We may share your personal data with advertisers and advertising networks who place ads (including sponsored links in search results) on our Websites.

4. Data transfers

We are a global organisation and our information systems are in several countries around the world. This means that we may transfer Personal Information to third parties, which may be located outside the European Economic Area ("EEA"), including processing an order and providing you with support services. For transfers outside the EEA within the Assaia Group we have executed a Data Transfer Agreement (which incorporates the EU's Standard Contractual Clauses). For transfers to third parties outside the Assaia Group, we have taken appropriate safeguards to require that the Personal Information we process will remain protected in accordance with this Privacy Statement.

For more information and to obtain a copy of the safeguards we have put in place, please see below under "Contact".

5. Retention of Personal Information

We retain Personal Information we process from you where we have an ongoing legitimate business need to do so (for example, to provide our Website or Services or to comply with applicable legal, tax or accounting requirements, or pursuant to an ongoing service contract). When the information we process is to provide our business partners with a service they have requested, they are normally responsible for the retention.

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

6. How do we keep your information secure?

We take the security of the Personal Information we process seriously and use appropriate technical and organizational measures to protect it against unauthorized processing, disclosure, alteration or damage. The measures we use are designed to provide security appropriate to the risk of processing your Personal Information. However, because no security system can be 100% effective, we cannot completely guarantee the security of any information we may have collected from or about individuals.

7. Links to other sites

These Websites contain links to other sites that are not owned or controlled by Assaia. Please be aware that we, Assaia, are not responsible for the privacy practices of such other sites.

We encourage you to stay aware when you leave our Websites and to read the privacy statements of each and every website that collects Personal Information.

8. Access to Personal Information and other rights

Where we collect and process your Personal Information in the context of our Website(s), you may access, update and rectify your Personal Information on your profile directly. In some countries (including in the EEA) you may have a more general right to access, update or rectify Personal Information as well as have additional rights. You may, for example, request that your Personal Information be erased or restricted. In addition, you may have the right to object to the processing of your Personal Information and request to have your Personal Information handed over to you or to another organization (data portability). You may also have the right to complain to a data protection authority about our collection and use of your Personal Information. You can email privacy@assaia.com at any time if you no longer wish to be registered with us. To obtain a copy of your Personal Information, or request the deletion of your account, please email privacy@assaia.com.

To the extent that we process your personal data based on your (initial) consent / opt-in, and not on other legal grounds, we will provide you with the opportunity to 'opt-out' later of having your personal data used for certain purposes when we ask for this information. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your Personal Information conducted in reliance on lawful processing grounds other than consent.

If you no longer wish to receive our marketing communications, you may opt-out of / unsubscribe from receiving them by following the instructions included in each newsletter or communication. For all other requests, such as (full) personal data erasure, please email privacy@assaia.com.

9. Operational improvement and security

You acknowledge that Assaia may create aggregated and anonymized data from the Personal Information supplied as part of the Services or via the Websites, and that

such data (the “Anonymized Data”) will no longer be Personal Information. Assaia may use the Anonymized Data for purposes of security testing and operational improvement, and to provide other organizations with reports. This provision is subject to all other parts of this document, and Assaia shall at all times comply with its obligations under applicable agreements and laws, and follow best practices for research.

10. Changes to this Privacy Statement

From time to time we may update this Statement in response to changing legal, technical or business developments. When we do, we will publish the changes on the Website, as appropriate. If material changes are made to this Statement, we will take appropriate measures to inform you, consistent with the significance of the changes we make. Your continued use of our Services and Websites after the effective date of such changes constitutes your acceptance of such changes.

11. Contact

You can submit any questions or concerns that you may have regarding our Privacy Statement by contacting us at privacy@assaia.com

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California

Assaia and its affiliates (“Assaia”), are committed to protecting the privacy of California consumers with whom we interact.

This CCPA Privacy Statement is a California-specific supplement to Assaia’s general Privacy Statement. The rights set forth in this CCPA Privacy Statement are in addition to any applicable privacy rights set forth in Assaia’s general (such as your ability to unsubscribe from Assaia registrations or marketing communications through the Assaia preference center).

1. The California Consumer Privacy Act of 2018

The California Consumer Privacy Act of 2018 and its regulations, (Cal. Civ. Code §1798.100 et seq., as amended, “CCPA”) gives California residents (CCPA “consumers”) rights and control over their personal information.

2. What is a CCPA “consumer”?

A CCPA “consumer” is a natural person who resides in California. For the purposes of this Privacy Statement, consumer does not include California-resident job applicants or Assaia employees.

3. What is “personal information”?

“Personal information” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or California household. Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated information.
- Other regulated information that is excluded from the CCPA's scope, such as:
 - medical information governed by the California Confidentiality of Medical Information Act (CMIA);
 - protected health information collected by a covered entity or business associated governed by the Health Insurance Portability and Accountability Act of 1996 (HIPAA);
 - clinical trial data subject to the Federal Policy for the Protection of Human Subjects;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

4. Assaia does not sell any personal information

Personal information subject to the CCPA, is “sold” under the CCPA when it is shared with a third party or another business for monetary or other valuable consideration, and not for an authorized or exempt reason/purpose under CCPA.

Under the CCPA, a business that sells California consumers’ personal information to others: 1) must give notice to the consumer before selling their personal information to others; and 2) must provide the right to opt out of the sale of their personal information.

Assaia does not sell personal information. Thus, these notification and opt-out requirements do not apply to Assaia.

5. Assaia as a service provider (not a CCPA business) in relation to users of Assaia tools pursuant to services sold to Assaia Customers

Assaia provides business-to-business (B2B) services to companies in the transport industry, such as airlines and airports (Assaia Customers). Where Assaia provides these services it is a CCPA “service provider” to Assaia Customers, collecting and processing personal information in connection with the services only on Assaia Customers’ behalf. If you are a user of Assaia-provided tools/software/platforms in the course of your employment with an Assaia Customer, and you have any questions about your personal information, Assaia advises that you please contact your employer, in relation to your personal information and your rights under the CCPA, as Assaia’s ability to respond to you as a service provider under CCPA is restricted, and Assaia is not the relevant CCPA business in relation to the processing of your personal information.

6. Who does this statement relate to?

This CCPA Privacy Statement relates to you if you are a California resident (a CCPA consumer) and Assaia communicates or interacts with you, in relation to the marketing or the potential supply of services to your company that your company does not yet receive (“you” in the following paragraphs). Assaia is a CCPA business in relation to your personal information, and not a service provider, and provides you the following disclosures and information, including in relation to your rights under CCPA.

Please note: the CCPA provides exemptions from certain CCPA requirements (including disclosure and consumer rights requirements) in respect of consumer personal information reflecting communications or transactions with employees, contractors, directors, and officers of Assaia Customers related to services actually/currently provided to those customers or to Assaia’s due diligence on Assaia Customers (“B2B communications exemption”), until and including December 31, 2020. If this exemption is removed or amended by the California legislature, Assaia will update this Statement to include any relevant disclosures required in connection with B2B communications. Notwithstanding the B2B communications exemption, Assaia collects and processes such personal information securely in accordance with Assaia’s general Privacy Statement.

7. Categories of Personal Information collected and/or disclosed (CCPA “Notice at Collection” information)

The table below outlines the categories of Personal Information (as defined by the CCPA) that we have collected and/or disclosed for a business or commercial purpose in the preceding twelve months. While the examples of Personal Information provided for each category are taken from the CCPA they are included only to help you understand what the categories mean, and more information about our specific practices can be found in Assaia’s general Privacy Statement.

Category	Examples of types of Personal Information within Category	Categories of Sources of information	Assaia collects category	Assaia discloses category	Assaia sells category
A. Identifiers	Name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name	Information you provide directly to us or automatically through your interaction with our websites.	YES	YES	NO
B. Categories of Personal Information in Cal. Civ. Code 1798.80(e)	Name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Not including publicly available information that is lawfully made available to the general public from federal, state, or local government records.	Information you provide directly to us.	YES	NO	NO
C. Characteristics of Protected Classifications under California or Federal Law	Race or color, ancestry or national origin, religion or creed, age (over 40), mental or physical disability, sex (including gender and pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity or expression, medical condition, genetic information, marital status, military and veteran status.	Information you provide directly to us.	NO	NO	NO
D. Commercial Information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Information you provide directly to us or automatically through your interaction with our websites, and vendors’ platforms.	YES	YES	NO

E. Biometric Information	Physiological, biological, or behavioral characteristics, including DNA, that can be used, singly or in combination with each other or with other identifying data, to establish individual identity, such as imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information.	N/A	NO	NO	NO
F. Internet of Other Electronic Network Activity Information	Browsing history, search history, and information regarding a consumer's interaction with an internet website, application or advertisement.	Information you provide directly to us or automatically through your interaction with our websites, and vendors' platforms.	YES	YES	NO
G. Geolocation Data	Such as physical location, IP address.	Information you provide directly to us or automatically through your interaction with our websites, and vendors' platforms.	YES	YES	NO
H. Sensory Information	Audio, electronic, visual, thermal, olfactory, or similar information.	N/A	NO	NO	NO
I. Professional or employment-related information	Job application or resume information, past and current job history, and job performance information	Information you provide directly to us or automatically through your interaction with our websites, and vendors' platforms.	YES	YES	NO
J. Non-Public Education Information (as defined in 20 U.S.C. 1232g; 34 C.F.R. Part 99)	Records that are directly related to a student maintained by an educational agency or institution or by a party acting for the agency or institution.	N/A	NO	NO	NO
K. Inferences Drawn from Personal Information	Consumer profiles reflecting a consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Information you provide directly to us or automatically through your interaction with our websites, and vendors' platforms.	NO	NO	NO

8. Assaia's use of Personal Information (CCPA "Notice at Collection" information)

The CCPA defines various business and commercial purposes for collecting, using, and disclosing Personal Information. While we collect, use, and disclose Personal

Information pursuant to Assaia's general Privacy Statement as a whole, Assaia wishes to clarify that this includes your Personal Information in accordance with the following specific CCPA business and commercial purposes:

1. Auditing related to Assaia's current interaction with you and concurrent transactions, including, but not limited to, counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance with this specification and other standards.
2. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
3. Debugging to identify and repair errors that impair existing intended functionality.
4. Short-term, transient use, in relation to Assaia's current interaction with you.
5. Contracting with service providers to perform services on our behalf, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of Assaia.
6. Undertaking internal research for technological development and demonstration.
7. Undertaking activities to verify or maintain the quality or safety of our services, and to improve, upgrade, or enhance our services.
8. Otherwise enabling or effecting, directly or indirectly, a commercial transaction between Assaia and your company.

9. Assaia's disclosure of Personal Information (CCPA "Notice at Collection" information)

As also explained in our general Privacy Statement, we share your Personal Information with the following categories of third parties:

1. Assaia's service providers, including for data analytics and marketing and advertising our products and services to you.
2. Third parties as required to comply with laws and similar disclosures, including but not limited to federal, state or local authorities, judicial or similar authorities in relation to legal claims, and law enforcement agencies where Assaia in good faith believes conduct or activity violates applicable laws (in which cases such disclosures are not restricted by the CCPA).
3. Third parties in connection with a merger, sale, or asset transfer (in which case such disclosure is not restricted by the CCPA).
4. Other third parties for whom we have obtained your permission to disclose your Personal Information.

10. Exercising your rights under CCPA

The CCPA provides California consumers with certain rights related to their personal information as set out below. To submit a request based on these rights, please contact us at privacy@assaia.com.

When receiving a request, we are required to verify that the individual making the request is actually you before we can fulfill the request. When you submit a request we will notify you of what information we need to verify your identity (depending on the nature of the request and your personal information). California consumers may exercise their rights themselves or may use an authorized agent to make requests to disclose certain information about the processing of their personal information or to delete personal information on their behalf. If you use an authorized agent to submit a request, we may require that you provide us with additional information demonstrating that the agent is acting on your behalf.

We will endeavour to fulfil a verifiable request within 45 days of submission using the methods described above. If we need additional time to fulfil the request, we will let you know in writing why we need more time and how much more time is being requested. The disclosures we provide only cover the 12-month period preceding receipt of your request. Where we are unable to comply with your request, we will explain why we cannot comply.

We will not charge you for responding to your request, unless (in the unlikely event) it is excessive, repetitive, or clearly inappropriate. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Under the CCPA, requests for personal information may only be made a maximum of twice per 12 months period.

11. Subject to applicable law, with respect to your personal information you have the following rights under the CCPA:

Right to know what personal information is being collected, for what purposes and with whom it is shared

You have the right to request from a business disclosure of the categories and specific pieces of personal information it has collected from them in the preceding 12 months, the categories of sources from which such personal information is collected, the business or commercial purpose for collecting or selling such personal information, and the categories of third parties with whom the business shares personal information.

Right to know whether your personal information is sold or disclosed for a business purpose and to whom

You have the right to request from a business that sells or discloses personal information for a business purpose separate lists of the categories of personal information collected, sold or disclosed for a business purpose in the preceding 12 months, including the categories of third parties to whom the personal information was sold or disclosed for a business purpose. Assaia does not sell personal information. As required by CCPA regulations, Assaia additionally confirms that it has no actual knowledge that it sells any personal information of minors under 16 years of age.

Right to say no to the sale of your personal information

The CCPA requires businesses that sell personal information to allow residents the ability to opt out of the selling of their information. Again, as Assaia does not sell personal information, this opt-out right does not apply to you or Assaia.

Right to non-discrimination if you exercise your privacy rights

The CCPA prohibits businesses from discriminating against a California consumer for exercising any of their rights under the CCPA, including by:

- denying goods or services to the consumer.
- charging the consumer different prices or rates for goods or services, including through the use of discounts or other benefits or by imposing penalties.
- providing the consumer with a different level or quality of goods or services.
- suggesting that the consumer exercising their rights will receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to deletion

California consumers have the right to request that a business delete any of their personal information that the business collected from them, subject to certain exceptions in CCPA §1798.105.

12. Contact for more information

If you have any questions or concerns about Assaia's privacy policies and practices, please contact us at privacy@assaia.com.

This Assaia CCPA Privacy Statement last updated: 1 February 2023

Singapore

This privacy policy applies to you if you are a resident of Singapore, and explains how we manage your personal information. It describes generally the type of personal information we hold and for what purposes, and how that information is collected, held, used and disclosed. This privacy policy also sets out how you can contact us if you have any questions about the management of your personal information or would like to access or correct the personal information we hold about you.

How we collect your personal information

We collect personal information about you in the following ways:

- when you register for, purchase or use any of the services that we provide;
- when you apply for a job with us;
- automatically through our internet-based services (e.g. by using cookies); and
- when you otherwise submit information to us, such as by registering on our website or participating in a survey or competition that we run.

Where we collect personal information from you, we will generally do so ourselves. However, in some cases we may collect personal information from a third party, such as through your representatives or contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

The types of personal information we collect

The personal information we collect about you may include, but is not limited to:

- identifying personal information, such as your name, date of birth, gender and nationality;
- contact information, such as your postal address, email address and telephone number;
- usernames and passwords that you create when registering for an account with us;
- details of any products or services that we provide to you;
- information about how you use the products and services we provide;
- records of our communications with you, including any messages you send us; and
- information automatically collected as a result of using our internet-based services (such as, internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and navigation data).

Without this information we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

Purposes for which we use personal information

We use personal information that we collect about you for the following purposes:

- to verify your identity when you are dealing with us;

- to carry out market analysis and research;
- to monitor use of our products and services, and to improve and enhance those products and services;
- to carry out education and training programs for our staff;
- to manage and resolve any legal or commercial complaints or issues (including customer complaints);
- to respond to any inquiries you make and to manage your account;
- to provide you the opportunity to participate in contests and surveys or use our referral service;
- to send you updates or newsletters about our products and services;
- to send you service-related announcements when necessary to do so (e.g. if our service is temporarily suspended for maintenance);
- to carry out planning and forecasting activities and other internal business processes; and
- to comply with our legal obligations in all of the jurisdictions where we operate.

If you no longer wish to receive our communications (such as newsletters or updates), you may opt-out of / unsubscribe to receiving them by contacting us using the contact details below.

Information Sharing and Disclosure

How we disclose your information

We may share personal information about you with:

- your representatives, advisers and others you have authorized to interact with us on your behalf;
- our staff, contractors and third-party service providers who need the information to discharge their duties (including to assist in the provision of our products and services);
- in the event of sale or merger of our business, to a prospective purchaser or merger partner and their respective advisers;
- any person that we are required or authorized by law to disclose your personal information to; and
- third parties as agreed with you from time to time.

Except as provided in this privacy policy, we do not disclose your personal information to third parties.

Transfer and disclosure of your personal information overseas

We may transfer your personal information to related and affiliate companies or third parties, which may be located in Australia, New Zealand, the European Economic Area ("EEA"), the United Kingdom and the USA, including for the purposes of storing and processing information for our commercial partners. Any data transferred and handled by us will be in accordance with this privacy policy.

Legal Disclaimer

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

Links to Other Sites

This website may contain links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites

We encourage you to be aware when you leave our site and to read the privacy policies or statements of each and every website that collects your personal information.

Storage and security of personal information

We generally store the personal information that we collect in electronic databases and local or central (located in USA, the EEA or Singapore) servers, some of which may be held on our behalf by third-party data storage providers. Sometimes we also keep hard copy records of this personal information in physical storage facilities. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, which may include encryption, and we update these from time to time to address new and emerging security threats that you become aware of. We have processes in place to delete personal information once it is no longer needed for any of the purposes contemplated under this policy.

Access and correction of your personal information

If you wish to request access to your personal information held by us, if you want to correct any information we hold, or if you no longer desire our services, you may correct, update, delete or deactivate it by contacting us using the contact details set out below.

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee to cover reasonable expenses to be incurred in providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal information and think we may have breached the Singapore Personal Data Protection Act, or any other relevant obligation, please contact our privacy compliance team using the contact

details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Singapore Personal Data Protection Commission.

Changes in this privacy policy

If we decide to change our privacy policy, we will post those changes to this privacy policy on this website and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances if any, we disclose it.

We encourage you to check our websites regularly for any updates to our privacy policy.

Contact

You can submit any comment, request, or question that you may have regarding our privacy policy by contacting us at privacy@assaia.com.

Australia

Assaia is committed to protecting the privacy of Australia consumers with whom we interact.

This Australia Privacy Policy is a Australia-specific supplement to Assaia's general Privacy Statement. The rights set forth in this Australia Privacy Policy are in addition to any applicable privacy rights set forth in Assaia's general Privacy Statement (such as your ability to unsubscribe from Assaia registrations or marketing communications through the Assaia preference center).

This privacy policy applies to you if you are a resident of Australia, and explains how we manage your personal information. It describes generally the sorts of personal information we hold and for what purposes, and how that information is collected, held, used and disclosed. This privacy policy also sets out how you can contact us if you have any questions about the management of your personal information or would like to access or correct the personal information we hold about you.

How we collect your personal information

We collect personal information about you in the following ways:

- when you register for, purchase or use any of the services that we provide;
- when you apply for a job with us;
- automatically through our internet-based services (e.g. by using cookies); and
- when you otherwise submit information to us, such as by registering on our website or participating in a survey or competition that we run.

Where we collect personal information from you, we will generally do so ourselves. However, in some cases we may collect personal information from a third party, such as through your representatives, contractors who provide services to us, or third parties who refer you to us because they think you may be interested in our products or services.

The types of personal information we collect

The personal information we collect about you may include, but is not limited to:

- identifying personal information, such as your name and title;
- contact information, such as your postal address, email address and telephone number;
- usernames and passwords that you create when registering for an account with us;
- details of any products or services that we provide to you;
- information about how you use the products and services we provide;
- records of our communications with you, including any messages you send us; and
- information automatically collected as a result of using our internet-based services (such as, internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp and navigation data).

Without this information we may not be able to provide you with our products or services (or with all of the features and functionality offered by our products or services) or to respond to queries or requests that you submit to us.

Purposes for which we use personal information

We use personal information that we collect about you for the following purposes:

- to verify your identity when you are dealing with us;
- to carry out market analysis and research;
- to monitor use of our products and services, and to improve and enhance those products and services;
- to carry out education and training programs for our staff;
- to manage and resolve any legal or commercial complaints or issues (including customer complaints);
- to respond to any inquiries you make and to manage your account;
- to provide you the opportunity to participate in contests and surveys or use our referral service;
- to send you updates or newsletters about our products and services;
- to send you service-related announcements when necessary to do so (e.g. if our service is temporarily suspended for maintenance);
- to carry out planning and forecasting activities and other internal business processes; and
- to comply with our legal obligations in all of the jurisdictions where we operate.

If you no longer wish to receive our communications (such as newsletters or updates), you may opt-out of / unsubscribe to receiving them by contacting us using the contact details below.

Information Sharing and Disclosure

How we disclose your information

We may share personal information about you with:

- your representatives, advisers and others you have authorized to interact with us on your behalf;
- our staff, contractors and third-party service providers who need the information to discharge their duties (including to assist in the provision of our products and services);
- in the event of sale or merger of our business, to a prospective purchaser or merger partner and their respective advisers;
- any person that we are required or authorized by law to disclose your personal information to; and
- third parties as agreed with you from time to time.

Except as provided in this privacy policy, we do not disclose your personal information to third parties.

Transfer and disclosure of your personal information overseas

We may transfer your personal information to our subsidiaries, related and affiliate companies or third parties, which may be located in New Zealand, the European Economic Area ("EEA"), the United Kingdom and the USA, including for the purposes of storing and processing information for our commercial partners. Any data transferred and handled by us will be in accordance with this privacy policy.

Legal Disclaimer

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process.

Links to Other Sites

This website may contain links to other sites that are not owned or controlled by us. Please be aware that we are not responsible for the privacy practices of such other sites

We encourage you to be aware when you leave our site and to read the privacy policies or statements of each and every website that collects your personal information.

Storage and security of personal information

We generally store the personal information that we collect in electronic databases and local or central (located in USA, the EEA or Singapore) servers, some of which may be held on our behalf by third-party data storage providers. We use a range of physical and technical security processes and procedures to protect the confidentiality and security of the information that we hold, which may include encryption, and we update these from time to time to address new and emerging security threats that you become aware of. We have processes in place to delete personal information once it is no longer needed for any of the purposes contemplated under this policy.

Access and correction of your personal information

If you wish to request access to your personal information held by us, if you want to correct any information we hold, or if you no longer desire our services, you may correct, update, delete or deactivate it by contacting us using the contact details set out below.

To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee to cover reasonable expenses to be incurred in providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.

Complaints

We try to meet the highest standards in order to protect your privacy. However, if you are concerned about the way in which we are managing your personal information and think we may have breached the Australian Privacy Principles, or any other relevant obligation, please contact our privacy compliance team using the contact details set out below. We will make a record of your complaint and refer it to our internal complaint resolution department for further investigation. We will deal with the matter as soon as we can, and keep you informed of the progress of our investigation. If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Office of the Australian Information Commissioner.

Changes in this privacy policy

If we decide to change our privacy policy, we will post those changes to this privacy policy on this website and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances if any, we disclose it.

We encourage you to check our websites regularly for any updates to our privacy policy.

Contact

You can submit any comment, request, or question that you may have regarding our privacy policy by contacting us at privacy@assaia.com.

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About Assaia

Assaia International AG is an aviation software company that is on a mission to use technology for the optimisation of the aviation industry. It uses a combination of Artificial Intelligence and computer vision to provide airports and airlines with complete visibility of turnaround operations at the airport.

Assaia gives airports and airlines control over turnaround operations, enabling them to predict issues and automate processes to make it more efficient. Assaia's solutions create a safer, faster and sustainable ecosystem so passengers can feel confident they are traveling on time, safely and sustainably.

www.assaia.com