

ZIONVERSE PRIVACY POLICY

Our privacy policy (“**Privacy Policy**”) aims to provide transparency about what we are doing with your personal information and how we are keeping it safe, in a clear, concise and easily comprehensible manner.

1. **What does this Privacy Policy cover?**

This Privacy Policy applies to all the users (“**you**” or “**your**”) of the www.zionverse.com website and mobile app (collectively, “**Platforms**”) as well as features or services offered on the Platforms (“**Services**”).

It describes how Totality Corp Pte Ltd., incorporated as a private limited company in the Singapore (“**Company**”, “**we**”, “**us**” or “**our**”) collects and handles your personal information (including sensitive personal data or information) when you use our Platforms or our Services.

Specifically, this Privacy Policy tells you:

- What information we collect about you and how;
- How we use that information;
- How we protect your information;
- What information we share with others; and
- What choices you have about your information.

Please read this Privacy Policy together with the ‘*Terms and Conditions*’ also available on our Platforms. In some cases, we may provide additional privacy policies specific to certain products, services, practices, or regions. Those terms are to be read in conjunction with this Privacy Policy.

Your use of our Platforms or our Services signifies your consent to the terms and privacy practices mentioned under this Privacy Policy. So, it is important that you read and understand this Privacy Policy before you start using our Platforms or our Services.

You need to be over the legal age of majority in your jurisdiction as well as competent to enter into a legal contract to use the Platforms or avail the Services. In case you are a minor, then please do not share any personal information with us without having your parent or legal guardian to accept this Privacy Policy.

2. **What’s not covered in this Privacy Policy?**

The Platforms or our Services sometimes link to services run by other companies’ services. Privacy practices of such companies are not in our control and are described in their own separate privacy policies. So, remember that the information you give them will follow their privacy policies and not ours. We encourage you to be aware when you access such third parties’ sites and services and to read their privacy policies. Also, sometimes you can access our Services from other places and

sites, like our social media accounts / handles (including on YouTube, Instagram, etc.). Make sure to check their privacy policies so you know how they will use your information.

3. **What information will we collect about you and how?**

We collect information from you when you use the Platforms and our Services. Some of this information is provided by you directly and we collect some of this information automatically. We may also receive your information from third parties. The information we collect depends on what you are doing on our Platforms and the privacy choices you make.

Please remember that you have a choice when it comes to the data you share. So, you may decline to provide your personal data when we ask you to. You can of course scroll through our Platforms without telling us who you are. However, you may not be able to use a particular Service if such Service requires you to provide personal data and you have chosen not to provide such data. For example, we will not be able to create an account on our Platforms, if you choose not to provide us with your email address or other required data.

(a) Information that you give us

We have listed out some of our Services which require you to give us information directly. Such instances are:

- (i) When you create or register a new account on our Platforms, or update your profile or settings on your existing Platform account, you will provide us with your information such as your name, email address etc.;
- (ii) When you communicate with us for assistance by phone, email or otherwise, we ask for some personal information like your name, phone number, product information, delivery time, contact and communication records; and
- (iii) When you provide your personal information under any other circumstances, such as when you participate in promotional, or marketing activities organized by us, when you post public review/ feedback on our Platforms, or participate in an online survey conducted by us.

(b) Information that we collect automatically

We may access certain data on your device through your use of the Platforms. Some data gets collected automatically, such as the browser or device type, unique device identifier (such as device ID or an IP address), your activity on the Platforms (such as the content you view, mouse movements, mouse clicks, taps, swipes, your preferences, frequency of usage and the like), your locational data including location information provided by your device interacting with the Platforms including through beacon technologies, or associated with your IP address or other online or device identifier and the like. In some cases, we

collect this data through cookies, pixels, tags, and similar tracking technologies that create and maintain unique identifiers.

We recommend you read the permissions prompt of the Platforms before you download / access them to exactly understand the type of data the Platforms will capture. For instance, the Platforms may require your permission to enable it to find the location of your device, camera usage, microphone access, mount and un-mount file systems, etc.

(c) Information that we collect from other sources

We may collect your information from other trusted sources to update, supplement, link or verify the information you provide, or we collect automatically. For instance, if you choose to register on our Platforms using your existing account on third party platform (such as social media platforms), we may collect your account information. Similarly, we may also obtain information about you from various third party sources such as credit bureaus, resellers and channel partners, public databases, etc. Such information could include your name, address, job role, public employment profile, credit history, and any other relevant data.

4. **How we use your personal information?**

We need to tell you the reason why we collect your information. It must relate to the Services that we provide you and collection is of course, a necessity. This is known as “lawful purpose” under law. We collect your information after complying with the applicable laws and the privacy choices that you have made on our Platforms, for *inter alia* the purposes mentioned below:

- (i) to validate and process your request for the Services on the Platforms;
- (ii) assist handling or fulfilling your orders or requests and establish communications with you;
- (iii) to personalize the Services and give you a better user experience on the Platforms;
- (iv) to assist you to determine which Services/products best meet your needs;
- (v) to facilitate our internal business operations, including the fulfilment of any legal and regulatory requirements;
- (vi) to provide you with recommendations about Services/products tailored to your tastes, based on your use of the Platform;
- (vii) to provide you with marketing communications and advertising that we believe may be of interest to you or that you may have opted for. You may opt-out of receiving promotional and advertising communications from us at any time by following the instructions in those communications

- (viii) resolve disputes or troubleshoot problems;
- (ix) detect and protect us against error, fraud and other criminal activity;
- (x) enforce our terms and conditions;
- (xi) to analyze, research and innovate; or
- (xii) as otherwise described to you at the time of collection.

5. What information will we share with others?

We will not sell your personal information. However, we do share your information with others for the purposes mentioned above.

We may disclose personal information to our affiliates or third-parties who will look after your information as if we were handling it directly and we make sure that they keep your information safe just like how we keep it safe with us. We will share with them only such personal information that is required to complete any transaction or provide any product or Service you have requested.

We may disclose your personal information to our affiliates when it is necessary to perform services on our behalf or on your behalf, to provide advertising and promotional services, to provide search results and links (including paid listings and links), or to provide customer service, etc. These entities and affiliates may market to you as a result of such sharing unless you explicitly opt-out. We may also disclose personal data as part of a corporate transaction such as a merger or sale of assets.

We may share some or all of your Personal Data in connection with or during negotiation of any merger, financing, acquisition, or dissolution transaction or proceeding involving sale, transfer, divestiture, or disclosure of all or a portion of our business or assets. In the event of an insolvency, bankruptcy, or receivership, Personal Data may also be transferred as a business asset. If another company acquires our company, business, or assets, that company will possess the Personal Data collected by us and will assume the rights and obligations regarding your Personal Data as described in this Privacy Policy.

Regardless of any choices you make regarding your Personal Data, we may disclose Personal Data if we believe in good faith that such disclosure is necessary (a) in connection with any legal investigation; (b) to comply with relevant laws or to respond to subpoenas or warrants served on us; (c) to protect or defend our rights or property or users of the Service; and/or (d) to investigate or assist in preventing any violation or potential violation of the law, this Privacy Policy, or our Terms of Use.

Please note that some of our Services include links to or could otherwise enable you to access products or services of third parties whose privacy practices are different from ours. If you provide personal data to such third parties, your data will be handled as per their privacy policy and not ours.

We may also share your personal information with third parties or law enforcement agencies if we have to do so under the applicable law or to enforce our Terms of Use or rules or when we believe that there is a need to protect you or other people from any harm.

6. How long will we keep your information?

We will hold your information for as long as necessary for the purposes that we have mentioned above, or law permits us to retain. We will not hold your information longer than that and delete it thereafter in a safe and secure manner.

7. What choices do you have about your information?

Remember, you have the ability to control your personal information. You can ask us to correct anything that you think is wrong with the personal information we have on record about you. Of course, we might need you to give us a few more details, such as which part needs an update, why you feel so, what identification documents you have (so that we know you are who you say you are), etc. Despite our best efforts, if we can't fulfill your request, we will get back and explain the reasons why (for instance, if you have not given what is required).

You have a right to change your mind and ask us to stop using your information. However, if you do so, you may no longer be able to use a particular Service, if such Service requires your personal information. If collection of personal information is mandatory, we will try making that clear at the time of collection so that you know.

8. How do we protect your personal information?

Security of your data is of utmost importance for us. We have adopted security measures that are in line with industry standards to protect the personal information you provide, and to prevent unauthorized access, public disclosure, use, modification, damage or loss of the data. We take all reasonable and practical steps to protect your personal information to protect your personal data and actively pass relevant security and privacy protection certifications.

However, please be informed that, despite our best efforts, no security measures are perfect or impenetrable. So, if you have any concerns that your Platform account or personal information has been put at risk, for example if someone has hacked your account or stolen your password, please get in touch with us as soon as reasonably practicable.

9. How do you find out changes to this privacy policy?

We may need to change this Privacy Policy for keeping our privacy practices attuned with new technologies, industry practices, regulatory requirements or for other purposes. If we make important changes and law requires us to let you know, we will do exactly that. It might be an email, a notice on our Platform Or other communication modes permitted under the law. If you are not fine with such changes, then you can always stop using the Platforms, delete your account and stop giving us any more personal information that you are not comfortable with. We would be sorry to let you go but remember that your choice matters to us.

10. How can you contact us?

We are here to help you, always. So, if there are any questions or complaints about this Privacy Policy and your personal information, please feel free to get in touch with our grievance officer at the details provided below:

Email: zion@totalitycorp.com

We will try to resolve your complaint/ request expeditiously and get back to you within one month.However, this is also subject to us receiving all pertinent information / documents from you in a timely manner.

11. Applicability of this policy on Users outside Singapore?

If you are a non-Singapore user of the Platform, by visiting the Platform and providing us with data, you acknowledge and agree that your Personal Data may be processed for the purposes identified in the Privacy Policy. In addition, your Personal Data may be processed in the country in which it was collected and in other countries, including Singapore, where laws regarding the processing of Personal Data may be less stringent than the laws in your country. By providing your data, you consent to such transfer.

12. How is your data protected?

We care about the security of your information and use physical, administrative, and technological safeguards to preserve the integrity and security of all information collected through our website. We implement a wide variety of security measures to maintain the safety of your personal information whenever you enter or submit or access your personal information. We offer the use of a secure server. All the data is stored in secure servers in locations like the Singapore and India. However, no security system is impenetrable, we cannot guarantee the security of our systems 100%. In the event that any information under our control is compromised as a result of a breach of security, we will take steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps, in accordance with any applicable laws and regulations.