

## SHRIMPL PRIVACY AND PERSONAL DATA PROTECTION POLICY

Shrimpl takes the protection of Your personal data very seriously and of paramount importance. We want each visitor of our website, [www.shrimpl.com](http://www.shrimpl.com) (the “**Website**”), to be in control of his personal data; the same goes for anyone using our software solutions, products, applications, web and cloud services (each a “**Service**”, collectively the “**Services**”).

This Privacy Policy provides information on how we collect, store, process, use and protect Your Personal Data. It explains in particular what information we collect and why we collect it, how we use that information and Your rights in relation to the information provided.

For the purpose of this Privacy Policy, “**Personal Data**” means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In this Privacy Policy, the terms “**we**”, “**us**”, “**our(s)**” and “**Shrimpl**” are referring to ShrimpStar Pte Ltd, a Singapore company registered in Singapore under number UEN 202144066M, having its registered seat at 160 Robinson Road, SBF Center #24-09, Singapore 068914. “**You**” or “**Your**” means you personally (i.e. the individual who reads and agrees to be bound by this Privacy Policy) and, if you use or access our Services on behalf of a corporation or other legal entity, collectively, you and such corporation or other legal entity on whose behalf you use and/or access the Services, You and us being collectively referred to as the “**Parties**”, and individually, as a “**Party**”.

This Privacy Policy supplements as an informational document (1°) the [Customer General Terms and Conditions](#) governing Your account on the Website, Your purchase transaction and our Services, (2°) the [End-User License Agreement](#) (the “**EULA**”) governing the use of the Shrimpl software solutions and products, and (3°) the [Website Terms of Use](#) governing the access, the visit and/or other use of the Website. In case of discrepancies between the terms of this Privacy Policy and the ones of any of the above-mentioned document, the former shall prevail.

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Please carefully read this Privacy Policy. When You use or access, or interfere with, the Website, the Cloud Platform and/or the Services, and by providing us with Your Personal Data, we collect, store, process and use Your Personal Data according to the applicable law, in particular with the EU General Data Protection Regulation (“**GDPR**”) (specifically but not limited to Article 6(1)(a) to (f) and Article 28) as well as the substantive laws of Singapore (together the “**Applicable Law**”), where Shrimpl is incorporated, and in accordance with the practices explained in this Privacy Policy.

**You granted us Your consent to do this when accessing, visiting and/or using the Website, when registering for an account and/or when signing up for use of the Shrimpl software solution(s) and/or products.**

**Please do not access or use or interfere with the Website, the Cloud Platform and/or our Services, or do not provide us with any of Your Personal Data, should You not fully consent to this Privacy Policy.**

In case of disagreement, if You withdraw Your consent or if You choose not to provide us with some of the required Personal Data, we may be totally or partially unable to provide You our Services.

Should You have questions or comments regarding this Privacy Policy or suggestions regarding its improvement, please contact our support team at [legal@shrimpl.com](mailto:legal@shrimpl.com).

## 1. Which data do we collect and how?

The following section describes the information that we collect and how we collect it. There are multiple ways in which we collect information, which can be broadly categorized into:

- (a) Information that You freely choose to share with us, and
- (b) Information that is automatically collected when using our Services.

### (a) Information that You freely choose to share with us

We collect the information that You directly provide to us, such as when You set up an account on the Website or when You send us an email.

This type of collection often occurs through our business support processes, such as:

- When You sign up for, and open, an account on the Website, or sign up for content or offers, we may then ask You to provide us with Personal Data such as: Your contact information (name, email or mailing addresses, phone number and details about Your organization), Your account administration information (user name, password, and security question), Your billing information (bank account, credit and debit card number, billing address) and Your profile information (profile photo, language);
- When You purchase, subscribe or otherwise obtain a licence to access and use our Services, where we may ask You to provide us with Your contact and billing information;
- When You ask us a question via the contact form or request technical assistance and/or customer support, we may ask You to provide us with Your contact information as well as information related to the issue You are contacting us about.
- In order to use our Services, we may ask You to provide us with Your contact information as well as Your account administration information.

Notwithstanding the above, please note that You may also choose to submit information to us via other methods, including: (i) in response to marketing or other communications, (ii) through social media or online forums, (iii) through participation in an offer, program or promotion, (iv) in connection with an actual or potential business relationship with us, or (v) by giving us Your business card or contact details at trade shows or other events.

Please note that You may deactivate Your Shrimpl account and/or unsubscribe from receiving content or offers from us at any time. Following termination of Your account, we may retain Your Personal Data (in part or in whole) in order to meet any regulatory and reporting requirements for the timeframes stipulated by law and in order to be able to address customer service issues. Any other Personal Data we would have been processing on Your behalf would be deleted permanently within 30 calendar days.

### (b) Information that is automatically collected when using our Services

Besides the Personal Data that You freely choose to share with us, we may automatically or passively collect and process various information regarding Your use of - and Your behaviour through - the Services, the Cloud Platform and/or the Website. While information collected in this manner is not typically Personal Data, we may combine it in ways that make it personally identifiable. When we do so, we will treat the combined information as Personal Data.

Information collected in this manner may include:

- Browser and device data. The Website and Cloud Platform use various technologies to function effectively and to record information about You, such as IP address, device type, operating

system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and the language version of the Website, if any, You are visiting. We also may collect information about Your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services.

- Usage data. So, when You visit the Website and Cloud Platform we store the name of Your internet service provider, the website from which You visited us from, the parts of the Website and Cloud Platform You visit, the date and duration of Your visit, and information from the device (device type, operating system, screen resolution, language and web browser type) You used during Your visit. We only capture and store a truncated version of Your IP address. This is captured and stored in an anonymized format by suppressing the last octet so Your full IP address never reaches our servers and we never have access to it.
- Physical or geographic location data. When You access and use the Services, visit the Website and/or the Cloud Platform, we may collect information about Your country, region, city, or latitude or longitude.
- Cookies. Shrimpl uses cookies to process information including standard internet log information and details of the visitor's behavioral patterns upon visiting the Website. Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the Website. Shrimpl stores this information in a pseudonymized user profile. Cookies are stored on Your individual device and You have full control over their use.

We use cookies to provide You with a better experience, and to facilitate the use of certain functions. Shrimpl does not process this information to identify individual users or to match it with further data on an individual user.

You may deactivate or restrict the transmission of cookies by changing the settings of Your web browser. Cookies that are already stored may be deleted at any time. Should You visit the Website with cookies deactivated, You may possibly not be able to use all of the functions on the Website to the full extent. Please refer to Sections 7 and 8 below for further details.

- Contact via e-mails. If You receive e-mails from us, we may use certain analytics tools, to capture data such as when You open our e-mail or click on any links or banners our e-mail contains.

We may also occasionally send You notification emails about updates to our products, legal documents, offer customer support or marketing emails. Except for cases where we are required to do so by law (e.g. notifying You of a data breach), You shall have the opportunity to unsubscribe from receiving these messages free of charge.

## **2. For what purposes do we collect data?**

As otherwise detailed in this Privacy Policy, we will solely process this information to understand Your needs and provide You with the Services You signed up for, and in particular for the following reasons:

- (a) facilitating and improving Your access to and use of the Services (e.g. to adjust the Services to the device You are using);
- (b) improving and personalizing the Services so as to better meet Your expectations;
- (c) recognizing and ceasing any misuse of the Services;
- (d) improving the Services, the Website and the Cloud Platform;

- (e) answering Your queries and providing You with effective assistance;
- (f) gauging the effectiveness of our communications and marketing campaigns;
- (g) delivering targeted offers, promotions, newsletters, surveys and other information;
- (h) conducting demographic or aggregate studies for marketing, sales, planning, and business product development; and
- (i) enabling and administering our business.

### **3. Data use**

We use non-personally identifying data without restrictions.

On the contrary, Personal Data are only used for the purposes for which they were collected (see Section 2). Please note that we strive to minimize our use of Personal Data, and, to the maximum extent possible, anonymize or aggregate it before use.

### **4. Legal grounds for data processing**

Without prejudice to the foregoing, we rely upon a number of legal grounds to ensure that our processing of Your Personal Data is compliant with Applicable Law. We process Personal Data to facilitate the business relationships we have with our users in general, and You in particular, and to pursue our legitimate business interests in gaining a better understanding of our Services, so we can improve them and your overall experience.

### **5. To whom are the collected data communicated?**

Shrimpl does not sell or rent Personal Data to marketers or unaffiliated third parties. We share Your Personal Data with trusted entities, as outlined below:

- (a) **Shrimpl.** We share Personal Data with other Shrimpl entities and affiliates in order to provide the Services and for internal administration purposes.
- (b) **Service providers.** We use a selected number of trusted external service providers for certain technical data analysis, processing and/or storage offerings. These service providers are carefully selected and meet high data protection and security standards.

We only share information with them (i) if required to achieve the purpose for which they were freely shared with us or that is required for the Services offered (e.g. the execution of an order, or the provision upon Your request of support services related to a hardware by the manufacturer of such hardware, (ii) if You have provided prior consent, (iii) if we are obliged to do so by statutory law or an instruction by a public authority or court, or (iv) upon the sale of our business.

- (c) **Third parties authorized or used by You.** Besides, we remind You that, when You are using, through our Services, third-party services and/or products (the providers of such services and/or products may also collect and process Personal Data through their services) (Your localization, Your user preferences, Your data, accompanying services, etc.) independently of the data processing conducted by Shrimpl in the provision of the Services. Please refer to the respective service provider's, manufacturer's or any other third party's privacy policy/information to learn about their own data protection practices. Some of these third party parties may export data to the United States which is considered a country not providing a level of data protection adequate to EU standards.

- (d) Corporate transactions. In the event that we enter into, or intend to enter into, a transaction that alters the structure of our business, such as a reorganization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transaction.
- (e) Compliance and harm prevention. We share Personal Data as we believe necessary: (i) to comply with applicable law, or payment method rules; (ii) to enforce our contractual rights; (iii) to protect the rights, privacy, safety and property of Shrimpl, You or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside Your country of residence. In case of fraudulent use of the Services and, in particular, upon suspicion of punishable acts, Your Personal Data may be analysed for purposes of clarification and, upon duly justified request, according to us, transmitted to the competent official authorities or to the third person affected by the fraud.

Finally, please remember that when You publicly share Personal Data, this information may be seen and used by other people, as well as indexed by search engines.

## 6. Trial version

When You sign up for a trial version of any of the Services, You agree to the [Customer General Terms and Conditions](#), to the [EULA](#) and appropriate [Terms of Use \(Website & Cloud Platform\)](#).

You are also aware that when You sign up, we may send You informative emails on tasks such as how to download, install, access and use the selected Services during Your trail period. We may as well send You feedback emails to evaluate Your experience using the Services and/or communications about any other Service that may interest You or assist You going forward.

Please note that You cannot unsubscribe from these emails as they are necessary for us to provide You with a trail of our Services. Once the trial period has ended, You will stop receiving these emails but will still receive the emails for which You have subscribed.

During the trial period, You will be able to unsubscribe from emails that are not necessary for the completion of the trial.

## 7. What kind of cookies do we use?

Like most websites, we may use cookies to optimize the Website. Cookies are little files that are stored on Your data storage medium and that memorize, through Your Internet browser, some configurations and data in order to exchange them with our system. We may in particular use the following cookies:

- (a) Strictly necessary cookies: these are cookies that are required for the operation of the Website and for You to be able to complete services You ask for. They include, for example, cookies that enable You to log into secure areas of the Website.
- (b) Functional cookies: these cookies record information about choices You make on the Website, such as Your user name, language or the region You are in. In this way, we are able to personalize Your visit on the Website.
- (c) Performance cookies: these “analytical” cookies allow us to collect information about how visitors use the Website, for example to count visitors and to see how visitors move around the Website. They record Your visit on the Website, the pages You have visited and the links You have followed and also Your shortened IP address. These cookies do not collect information that identifies You. All information is anonymous. This helps us to improve the way the Website works. In order to continuously improve and

optimize the Website, we may use in particular the Google Analytics™ tracking technology. Google Analytics™ is a service of Google LLC. Google

Analytics™ is a web-analysis service allowing us to better understand Your behaviour on the Website and to diagnose technical issues. It may use a certain type of cookies in order to collect anonymous information and create activity reports regarding usage statistics of the Website without You being personally identified. If You do not agree with Google Analytics™ collecting personal data regarding Your visits, You can install an [add-on module](#) for Your web browser, which allows You to deactivate Google Analytics™ for the future.

- (d) **Social media cookies:** these cookies allow You to share some content of the Website with social media platforms (e.g. Facebook™ or Twitter™ buttons). This method may authorize the concerned social media to monitor Your navigation on the Website by the mere fact that Your account is activated on Your device (open session) during the navigation. We have no control over these cookies as they are set by third-party providers.
- (e) **Advertisement cookies:** these cookies allow us to deliver tailor-made advertisements to You on third-party websites based on Your interests in our products and services manifested during Your visit on the Website. These cookies do not collect information that identifies You. All information is anonymous.

We may engage on the Website in interest-based advertising, including retargeting or remarketing technology provided by third parties, such as Google™ or Facebook™. Based on that, we are able to approach You with personalized advertisements. For this purpose, cookies are stored on Your computer. During Your visit on the Website, neither the third-party providers nor Shrimpl collect any personalized data, only anonymized data. Thanks to such data we can, for example, approach You with advertisements on third-party websites which is personalized according to Your interests in our products or services, e.g. after You have visited the Website and showed interest in a particular series of products or services, this technology may later show You more information in form of advertisements while surfing on another website. The only goal of engaging this technology is to best adapt the available information to Your interests and to make Your online experience as informative as possible.

- (f) **Flash cookies from Adobe Flash Player™:** Adobe Flash Player™ is a piece of software allowing quick development of dynamic content using "Flash" language. Flash (and application of the same type) memorizes the settings, the preferences and the utilization of these contents thanks to a technology, which is similar to cookies. However, Adobe Flash Player™ manages this information and Your choices through an interface that is different from the one provided by Your web browser. As Your device could visualize content developed in Flash language, we invite You to access Your Flash cookies management tools, directly through the following website: <http://www.adobe.com/fr/>

## 8. How can You control the cookies that we use?

Upon Your first visit on the Website, You shall express Your choice regarding the use of cookies on Your computer. If you leave cookies "turned on", we can offer You a better experience on the Website. If You set Your browser to block all cookies (including strictly necessary cookies), You may not be able to access parts of the Website.

At any time, You may deactivate cookies as follows:

- Most browsers accept cookies automatically but allow You to disable them. The help menu on most browsers will tell You how to prevent Your browser from accepting new cookies, how to have the browser notify You when You receive a new cookie and how to disable cookies altogether. You can also disable or delete cookies You have previously accepted if You wish to. Further information is available on the following websites:

**Microsoft Internet Explorer™:**

<https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>



**Mozilla Firefox™:**

<https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

**Safari™:** [https://support.apple.com/kb/PH17191?locale=fr\\_FR&viewlocale=en\\_US](https://support.apple.com/kb/PH17191?locale=fr_FR&viewlocale=en_US)

**Google Chrome™:** <https://support.google.com/accounts/answer/61416?hl=en>

- Most cookies can also be deactivated through third-party tools, such as the ones proposed by the website <http://www.youonlinechoices.com/uk>, by the website <http://www.networkadvertising.org/choices> or by the website <https://www.ghostery.com/fr>. Further, most of third-party providers offer modules or proceedings allowing You to deactivate the cookies they use. Shrimpl offers no guarantee regarding these tools, developed by third parties.

## 9. Your Personal Data, Your Rights

In line with Applicable Law, You have the right to be informed of Your Personal Data processed by Shrimpl, a right to rectification and/or correction, a right of erasure and/or restriction of processing. You have also the right to receive from Shrimpl a structured, common and machine-readable format of Your Personal Data You provided to us.

You may at any time change and/or withdraw Your consent regarding any use or processing of Your Personal Data, without affecting the lawfulness of the processing that was carried out prior to withdrawing it. To this end, You may simply log onto Your account, access Your profile and make the desired changes or, should this option not be available, please contact our support team at [support@shrimpl.com](mailto:support@shrimpl.com). Unless we are not able to identify the Personal Data that concerns You, the request is clearly unfounded or abusive (due notably to its repetitive nature) or we may oppose You another lawful legitimate reason, we will respond to Your request in a timely manner and at no cost.

Whenever You withdraw Your consent, You acknowledge and agree that this may have a negative influence on the quality of the Website, the Cloud Platform and/or the Services. You further acknowledge and agree that Shrimpl shall not be held liable with respect to any loss and/or damage to Your Personal Data if You choose to withdraw consent.

## **Information about Your right of objection under Article 21 GDPR**

### **1. Right of objection in individual cases**

In addition to the rights already mentioned, You have the right, for reasons arising from Your particular situation, to object at any time to the processing of Personal Data relating to You, which is processed on the basis of Article 6 (1) e) GDPR (data processing in the public interest) and Article 6 (1) f) GDPR (data processing on the basis of a balance of interests); this also applies to profiling based on this provision within the meaning of Article 4 (4) GDPR. If You file an objection, we will no longer process Your Personal Data unless we can prove compelling grounds for the processing that outweigh Your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims. Please also note that, if we terminate the processing due to Your objection, the Website may no longer be available to You or only to a limited extent.

### **2. The right to object to the processing of data for advertising purposes**

You also have the right to object at any time to the processing of Personal Data concerning You for the purpose of direct marketing (including any subscription to our newsletter or personalized ads); this also applies to profiling, insofar as it is associated with such direct marketing. If You object, we will no longer process Your Personal Data in the future.

The objection can be made form-free and should be addressed to the following e-mail: [legal@shrimpl.com](mailto:legal@shrimpl.com).

More generally, please send any request by mail or e-mail, with sufficient information for us to unequivocally identify You, to:

**ShrimpStar Pte Ltd**  
160 Robinson Road  
SBF Center #24-09  
Singapore 068914  
E: [legal@shrimpl.com](mailto:legal@shrimpl.com)

Finally, please note that, in addition, You have the right to lodge a complaint with the data protection authority in Your jurisdiction.

Please note that You are not required by law to provide us with the Personal Data as indicated by this Privacy Policy. Further, the contractual relationship that You might have entered into with us by agreeing to our terms and conditions does not imply any obligation to provide Your Personal Data. However, You might not be able to use our Service(s) to the full extent if You do not provide us with certain data or object to the use of these Personal Data.

#### **10. Security and retention of Personal Data**

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organizational, technical and administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If You have reason to believe that Your interaction with us is no longer secure (for example, if You feel that the security of Your account has been compromised), please email [legal@shrimpl.com](mailto:legal@shrimpl.com) immediately.

We will store Your usage data until such time when You withdraw Your consent for us to do so. All other Personal Data as specified above will be retained for as long as is necessary for the purpose(s) for which we originally collected it. We may also retain information and/or Personal Data as required by law.

#### **11. International Personal Data Transfer**

We are a global business. Personal Data may be stored and processed in any country where we have operations or where we engage service providers. We may transfer Personal Data that we maintain about You to recipients in countries other than the country in which the Personal Data was originally collected, including to the United States. Those countries may have data protection rules that are different from those of Your country. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that Your Personal Data remains protected to the standards described in this Privacy Policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Your Personal Data.

If You are located in the European Economic Area, we comply with applicable laws to provide an adequate level of data protection for the transfer of Your Personal Data.

#### **12. Revision to this Privacy Policy**

We may revise this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The “Last updated” legend at the top of this Privacy Policy indicates

when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Services. We may provide You with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on the Website.

If You have an account with us, we will notify You of any material modifications by sending You an e-mail to the e-mail address associated with Your account, unless You have unsubscribed from all e-mail communications.

### **13. Links To Other Websites**

The Services may provide the ability to connect to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest You review. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of such website or the privacy practices of the operator of such website.

### **14. Contact us**

If You have any questions or complaints about this Privacy Policy, please [legal@shrimpl.com](mailto:legal@shrimpl.com) electronically or send physical mail to:

160 Robinson Road  
SBF Center #24-09  
Singapore 068914