



## PRIVACY POLICY

The Company, CoachReg Pte. Ltd (UEN: 201325549N) and its brand, actualyse.com (**interchangeably referred to herein as “We”, “Our” or “Us”**) take your right to privacy very seriously. We continuously work to strike a balance between your personal privacy and ensuring that you obtain maximum value from actualyse.com and other products and services that we provide.

This policy (**“Privacy Policy”**) explains the purposes and method of use of the personal data and information (**“Personal Data”**) collected from you, whether in the capacity as a User, Member, Partner, Advertiser or Merchant (**collectively and interchangeably referred to herein as “You” or “Your”**) on actualyse.com. This Privacy Policy also explains the measures we undertake to protect the security of your Personal Data. Please read this Privacy Policy carefully. By using actualyse.com, you agree to us collecting, using, disclosing and sharing your Personal Data as described in this Privacy Policy.

We reserve our right to update our Privacy Policy from time to time. We suggest that you periodically check the terms thereof for updated information on the handling of your Personal Data.

For the avoidance of doubt, this Privacy Policy is supplementary to and does not supersede or replace any other consents that you may have previously provided us with respect to your Personal Data. Your consent herein is additional to any rights which we may have at law to collect, use, disclose and share your Personal Data.

Furthermore, this Privacy Policy forms part of our Terms and Conditions for Use applicable to the User, Member, Partner, Advertiser or Merchant, as the case may be (**“Agreement”**). All defined terms contained in the Agreement shall likewise apply to this Privacy Policy.

### 1. **PERSONAL DATA COLLECTED**

1.1 **“Personal Data”** means any data, whether true or not, about an individual who can be identified:-

- a) from that data; or
- b) from that data and other information to which the organisation has or is likely to have access.

- 1.2 Upon registration, actualyse.com will collect the following Personal Data from you:-
- a) Name, gender, date of birth, NRIC or passport number, civil status and family information;
  - b) Contact number(s) and mailing address(es);
  - c) Email address, Social Platform Account(s) and password;
  - d) Education and occupation; and
  - e) Payment related information (e.g. bank account details and/or credit card information).
- 1.3 For the avoidance of doubt, actualyse.com reserves the right to require additional information as deemed necessary by Company. We reserve our right to obtain additional information from you by using your e-mail address (parent/guardian's email address, in case of minors), third party information providers, searches done on the internet and all other reasonable and legal means.

## **2. USE OF YOUR PERSONAL DATA**

actualyse.com will use your Personal Data in order to:-

- a) register you and create your actualyse.com account/profile;
- b) administer your actualyse.com account/profile;
- c) send you information and updates on actualyse.com;
- d) obtain your opinion and comments on your experience in using actualyse.com and respond to queries and complaints;
- e) carry out analysis, including analysis on your activities and make general improvements on actualyse.com;
- f) identify or resolve technical problems or respond to complaints on actualyse.com;
- g) ensure compliance with the Agreement; and

h) protect actualyse.com's and the Company's rights.

### **3. DISCLOSURE AND SHARING OF YOUR PERSONAL DATA AND/OR OTHER INFORMATION**

3.1 Subject to Clauses 3.2, Clause 3.3 and Clause 3.4 below, actualyse.com undertakes to protect confidentiality of your Personal Data which has or will be disclosed to actualyse.com for the purpose of the Agreement. actualyse.com shall not disclose your Personal Data and/or other information unless (a) with your prior authorization; (b) we have given prior notice that the information you provided us will be disclosed and shared; or (c) the information is an aggregate information or other information that does not personally identify you.

3.2 actualyse.com reserves its right, without any liability, to disclose and share your Personal Data and/or other information with our family of companies and carefully selected third parties to perform functions on our behalf consistent with this Privacy Policy, including but not limited to, data analysis firms, customer support specialists, email vendors, web-hosting companies and other service providers. In addition, actualyse.com reserves its right, without any liability, to pass your Personal Data and/or other information to carefully selected business partners or third parties to enable them to send information which may be of interest to you, but this will only be with your permission. You have the option to stop this at any time by sending an e-mail to us at **members@actualyse.com** or by clicking "Unsubscribe" in the emails you receive.

3.3 actualyse.com reserves its right, without any liability, to transfer your Personal Data and/or other information to a third party as part of a sale of some or all of Company's business and assets to any third party or as part of any business restructuring or reorganisation. For your protection, actualyse.com will take steps with the aim of ensuring that your privacy rights are continuously protected.

3.4 You grant actualyse.com the right to disclose to third parties, without any liability, your Personal Data insofar as such information:-

a) has to be disclosed pursuant to any applicable law or legal process served on actualyse.com;

b) has to be disclosed pursuant to the lawful operation of any government or regulatory body;

c) is required to enforce this Privacy Policy and the Agreement;

- d) is required to facilitate your subscription and participation on actualyse.com; or
- e) is required to facilitate an audit or evaluation of actualyse.com or the Company's activities.

#### **4. SECURITY**

- 4.1 actualyse.com works hard to protect you from unauthorised access or unauthorized alternation, disclosure or destruction of the information/Personal Data we hold in relation to your actualyse.com account. Your actualyse.com account is protected by a password for your privacy and security. You need to prevent unauthorized access to your account by selecting and protecting your password appropriately and limiting access to your computer and browser by logging out after your each session on actualyse.com.
- 4.2 actualyse.com implements technology and policies to safeguard your privacy from unauthorized access and improper use. actualyse.com uses secure socket layer ("**SSL**") software to encrypt our services and the sensitive information which you have provided to actualyse.com, including passwords. While actualyse.com implements stringent measures to protect your information, actualyse.com cannot guarantee the security of any information.
- 4.3 actualyse.com reviews its information collection, storage and processing practices, including physical security measures to guard against unauthorized access to our systems. actualyse.com is hosted with a ISO 27001-compliant data centre.
- 4.4 actualyse.com restricts access to your Personal Data to our employees, contractors or agents who absolutely need to know the said information in order for us to fulfill our obligations under the Agreement and who are subject to strict confidentiality and non-disclosure obligations and shall be terminated and imposed of sanctions accordingly if they fail to meet their confidentiality and non-disclosure obligations.

#### **5. OTHER INFORMATION COLLECTED FROM YOU**

- 5.1 When you visit and log on to your actualyse.com account, our web server automatically records your IP Address. This IP Address is not linked to any of your Personal Data. We use IP Addresses to help us administer actualyse.com and to collect demographic information for aggregation purposes.
- 5.2 We may also gather other non-personal information (from which we cannot identify you) such as the type of internet browser and version, operating system and platform and other similar information which actualyse.com uses to provide you with more effective services.

## **6. COOKIES AND PAGE TAGS**

6.1 When you visit actualyse.com and/or log in to your actualyse.com account, actualyse.com may store some information on your computer and/or mobile device ("**Cookies**"). Cookies are pieces of information that actualyse.com transfers to the hard drive of your computer and/or mobile device to store and sometimes track information about your activities on actualyse.com and online. Cookies are specific to the server that created them and cannot be accessed by other servers, which means that they cannot be used to track your movements around the web. For the avoidance of doubt, your password will not be stored in Cookies. Page Tag is a piece of code which reads and writes Cookies.

6.2 actualyse.com may use Cookies for the following purposes:-

- a) To store your details so that you do not have to re-enter details each time you log in to your actualyse.com account; and
- b) To track how actualyse.com is used by you and to improve and update actualyse.com's contents.

6.3 You have the option to turn off processing of Cookies from your computer and/or mobile device. If you choose to set your browser not to accept cookies, actualyse.com does not guarantee your full and unrestricted access to actualyse.com as certain parts of actualyse.com may be reliant on the use of Cookies to operate correctly.

## **7. YOUR POST(S) AND/OR LISTING(S) ON ACTUALYSE.COM**

You shall be solely responsible for the content of your Post(s) and/or Listing(s) (text, photo, video, message, review, link or other information) uploaded by you on your actualyse.com account. Any information that you post on your actualyse.com account shall become public information and you assume full responsibility therefor. In the event that Member is a minor, his/her parent/guardian shall assume full responsibility for the minor's Post(s).

## **8. LINKS TO THIRD PARTY WEBSITES**

actualyse.com assumes no responsibility for the privacy policies and practices of third party websites using links from actualyse.com website. actualyse.com recommends that you check and carefully review the privacy policy of each site you elect to access through actualyse.com.

9. **INFORMATION ABOUT ACTUALYSE.COM AND OTHER PRODUCTS AND SERVICES**

From time to time, actualyse.com may contact you (by mail, email, phone call or SMS) to give updates, newsletters, promotional materials about actualyse.com and our products and services that may be of interest to you. You have the option to stop this at any time by sending an e-mail to [members@actualyse.com](mailto:members@actualyse.com) or by clicking the “Unsubscribe” button.

10. **UPDATES ON YOUR PERSONAL DATA**

You are required to notify us, as soon as practicable, of any changes to the information provided by you upon registration by updating the details in order to facilitate efficient communication between actualyse.com and you. To update, please log in to your account and make the necessary changes in your account’s personal dashboard.

11. **POLICY TOWARDS MINORS**

We require you to be at least **Eighteen (18) years** of age. In the event that you are less than **Eighteen (18) years** of age, we will require parental/guardian’s consent. In the event that we unknowingly collect information from minors, actualyse.com shall take all reasonable measure to promptly erase such information from our system upon notification of the same. In the event Members are the one who falsify their age or did not declare their age, actualyse.com will be indemnified from any loss or damages that arises from this declaration.

12. **WITHDRAWAL OF CONSENT**

In the event you would like to refuse to give consent and/or withdraw your consent to any and all use of your Personal Data, actualyse.com is no longer in the position to provide its products and services to you. This shall be a cause for termination of your actualyse.com account. In such eventuality, our rights are expressly reserved.

13. **POLICY TOWARDS CORPORATE ENTITIES**

In the event Partner, Advertiser and/or Merchant is a corporate entity, the said party expressly agrees to be bound by this Privacy Policy as if an individual. Company in return undertakes to exercise the same degree of care as exercised with Personal Data with regard to information (i.e. ACRA registration number, contact number(s), mailing address(es), email address(es) and payment related information, among others) pertaining to the Partner, Advertiser and/or Merchant.

**14. QUESTIONS/COMMENTS**

Your opinion matters to us. For comments, suggestions or queries about this Privacy Policy, please get in touch with us by post at 2 Kallang Avenue #07-19 CT Hub Singapore 339407 or contact us at +65 6589 8511/ 8503 or at [members@actulayse.com](mailto:members@actulayse.com) and we will do our best to address your concerns.

**15. GOVERNING LAW AND DISPUTE RESOLUTION**

Subject to the provisions of the Agreement, this Privacy Policy and your use of [actualyse.com](http://actualyse.com) shall be governed in all respects by the laws of Singapore and the Personal Data Act 2012. The Parties hereby submit to the exclusive jurisdiction of the Singapore courts.

This Privacy Policy was last modified on 6 August 2015.