

HOLMUSK'S PRIVACY & DATA PROTECTION POLICY

Updated: September 2017

We at KKT Technology Pte. Ltd. and its subsidiaries, affiliates and related corporations (“**Holmusk**”, “**we**”, “**us**”, or “**our**”) recognise the importance of safeguarding your personal data and take our responsibility to properly manage, protect and process your personal data under Singapore’s Personal Data Protection Act 2012 (No. 26 of 2012) (the “**PDPA**”) seriously.

This Privacy & Data Protection Policy (the “**Privacy Policy**”) explains how we collect, use, disclose or process your personal data through your interactions with Holmusk’s services, websites, devices, applications, programmes, servers, software including the following properties which are owned and operated by us:

- Websites including <https://holmusk.com>, <http://glycoleap.com/>, <https://getsuperleap.com/> and the associated applications and services;
- Mobile applications (“**Apps**”) on the iPhone, the iPad, and mobile devices operating with the Android, iOS and other operating systems; and
- All other properties which reference this Privacy Policy in a link or otherwise.

This Privacy Policy applies to all our interactions with you as well as other Holmusk products and services that has a reference or link to this Privacy Policy.

Please read this Privacy Policy carefully and should you have any queries about how we may manage, protect or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at +65 6250 4233 or email dpo@holmusk.com. By continuing to use our products and services, you are deemed to have consented to the terms of this Privacy Policy. Please notify us and stop using our products and services immediately if you do not consent to this Privacy Policy.

1. PERSONAL DATA COLLECTED BY HOLMUSK

1.1 Holmusk is a digital health company, focused on solving complex problems in healthcare. We therefore collect your personal data to provide you with personalized products and services and to operate our business of building innovative, scalable and cost-effective digital behavioural change programs and we combine that with our own clinical research, technology and design to develop sustainable solutions to achieve better health outcomes. We develop solutions for personalized care and better population health management. Our mission is to improve health outcomes.

- 1.2 Collection. Therefore, in using Holmusk's services, you may be asked to provide us with personal data such as your name, age, weight, height, contact information or geographical location from time to time, and we may collect your personal data either directly from you, your authorised representatives (e.g. medical professionals), and/or through our third party service providers (e.g. partners or third party applications) to personalize your experiences and improve our products.
- 1.3 Consent. By accessing or using our website, products, services or otherwise providing us with your personal data, we shall be entitled to assume that you understand and agree to the terms of this Privacy Policy and consent to the collection, use and disclosure of your personal data by Holmusk. If you do not consent to any of these terms, please do not access or use any of our products or services, or provide us with any of your personal data.

2. PURPOSES FOR COLLECTION, USE, DISCLOSURE & PROCESSING OF PERSONAL DATA

- 2.1 Holmusk uses your personal data to provide you with relevant products and to operate its business. We may also use the data collected to communicate with you, for example, to inform you about new product features, security updates or to inform you about your account. Your personal data may also be used to show you more relevant information, content, advertisements, whether through Holmusk's own products or third-party applications and in combination with information from other sources.
- 2.2 Some examples of how Holmusk uses your personal data include:
- (a) To process, record, monitor and fulfil your transactions or your requests;
 - (b) Facilitating Holmusk's provision of the products and services;
 - (c) Communicating with you for research, marketing, advertising and promotional purposes;
 - (d) Administrative matters on your product and/or service purchases and/or subscriptions, managing your accounts, processing your sign-ups/registrations for mailing lists, etc.;
 - (e) Diagnosis and maintenance of our products and services;
 - (f) Maintaining the security of our products;
 - (g) To protect you and other customers;

- (h) Enforcement of Holmusk's policies and procedures; or
 - (i) Such other purposes notified to you from time to time.
- 2.3 The way your personal data is used will depend on the circumstances at hand, and it will be used in compliance with applicable laws and regulations.
- 2.4 Holmusk's GlycoLeap application uses your personal data to: [track the food you eat, number of steps taken, send you notifications on your mobile device, view, manage and control your personal data. GlycoLeap also allows you to share your personal data with your family and health care professionals].
- 2.5 Holmusk's SuperLeap application uses your personal data to: [track the food you eat, number of steps taken, send you notifications on your mobile device, view, manage and control your personal data. SuperLeap also allows you to share your personal data with your family and health care professionals.]

3. SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

- 3.1 It may also be necessary in certain circumstances for us to share your personal data with third parties such as our subsidiaries, affiliates, related corporations, service providers, vendors, regulatory authorities or other third parties. Such third parties processing your personal data either on our behalf or otherwise may be located in a different country from the point of collection of your personal data (e.g. transfer to Amazon Web Services servers located in Singapore), or may have multiple physical locations and backups (e.g. cloud based services).
- 3.2 Where your personal data must be shared with third parties in circumstances that are not reasonably contemplated within the normal course of our dealings with you, we would usually first seek your consent unless the disclosure:
- (a) is required or authorised based on the applicable laws and/or regulations;
 - (b) is clearly in your interests, and if consent cannot be obtained in a timely way;
 - (c) is necessary to respond to an emergency that threatens the life, health or safety of yourself or another individual;
 - (d) is necessary for any investigation or proceedings;
 - (e) is required by a law enforcement agency;

(f) is to a public agency and necessary in the public interest; and/or

(g) where such disclosure without your consent is permitted by law.

3.3 Where we disclose your personal data to third parties, we will employ our best efforts to require such third parties to protect your personal data.

3.4 By using Holmusk's products and services, you agree that the transfer of your personal data to various countries is reasonably necessary for us to provide you with these tools, products and services.

4. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

4.1 You may request access to or correct the personal data held by us by submitting a written request at any time to dpo@holmusk.com.

4.2 We may require further information from you to verify your identity as well as the nature of your request, to deal with your request. Handling and processing fees may be payable before we can proceed with your request.

4.3 Once we have sufficient information to deal with your request, we will seek to provide you with the relevant personal data or information within 30 days of your request, unless otherwise stated.

5. REQUEST TO WITHDRAW CONSENT

5.1 Should you wish to withdraw your consent to Holmusk's use of your personal data, please stop using our products and services immediately and notify us in writing at dpo@holmusk.com to inform us that you wish for us to stop collecting, using or sharing your personal data and we will process your request within a reasonable time from such a request. You may also elect to withdraw your consent to the use of your personal data for a specific purpose, so please ensure that your notification contains sufficient and specific information to enable us to comply with your request.

5.2 However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent for us to process your personal data, it may mean that we will not be able to continue with your existing relationship with us.

6. RETENTION, ADMINISTRATION & MANAGEMENT OF PERSONAL DATA

- 6.1 We will take reasonable efforts to ensure that your personal data is accurate and complete, based on the information that you have provided us with. Please ensure that all information provided to us is up to date and keep us informed of any relevant changes.
- 6.2 Holmusk values your privacy and has security arrangements to ensure that your personal data is adequately protected and secured. We will also put in place measures such that your personal data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that personal data was collected is no longer being served by the retention of such personal data; and (ii) retention is no longer necessary for any other legal or business purposes. Otherwise, personal data collected by Holmusk is generally only retained for as long as it is reasonably necessary for the purpose for which the data provided and we may destroy or delete any information or personal data provided by you thereafter, unless required by law, regulation or other business or audit requirements.
- 6.3 Where your personal data is to be transferred out of Singapore or such other jurisdiction in which it is collected, we shall take reasonable steps to ascertain that the recipient of the personal data is bound by legally enforceable obligations to protect your personal data in accordance with this Privacy Policy and the PDPA.

7. COMPLAINT PROCESS

If you do not consent to any of the terms of this Privacy Policy, our use of your personal data or have any complaint or grievance regarding about how we handle your personal data, we welcome you to contact us with further details at:

Singapore Telephone No.: +65 6250 4233

E-mail address: dpo@holmusk.com (please attention it to the 'Data Protection Officer')

Office address: 71 Ayer Rajah Crescent, #06-08/09, Singapore 139951 (please attention it to the 'Data Protection Officer')

8. UPDATES ON DATA PROTECTION POLICY

- 8.1 As part of our efforts to ensure that we properly manage, protect and process your personal data, we will be reviewing our policies, procedures and processes and may update, at our absolute discretion, update the terms of this Privacy Policy from time to time. Any revised Privacy Policy will be posted on our website and can be accessed at www.holmusk.com.
- 8.2 You are encouraged to visit the above website from time to time to ensure that you are well informed of our latest policies in relation to personal data protection.

9. COOKIE POLICY

- 9.1 We may collect information from you (or others on your behalf) de-identified information to help us in our business and provide you with relevant products and services. Such anonymised and de-identified information may be transferred, disclosed, assigned, leased, licensed, sold and otherwise shared with and by our partners, service providers, advertisers and/or other third parties for purposes permitted under law.
- 9.2 Cookies (small text files placed on your device that record information about your preferences and enable log-ins, provide interest based advertising, analyze how our products and services are performing) are example of such anonymised data that Holmusk collects. While compiling information about your browsing habits, cookies can also enhance your user experience. There may also be third party cookies on our websites. For more information on cookies, please refer to www.allaboutcookies.org/manage-cookies/.
- 9.3 You can control cookies through your web browser settings. This allows you to determine which cookies to allow and which to refuse. If you disallow the use of cookies on our website, please note that you may not be able to access the full range of functions that our website offers.
- 9.4 If you do not consent to our use of cookies, you should adjust your browser settings accordingly or not use any of Holmusk's products and services.
- 9.5 For more information, please refer to <https://getsuperleap.com/cookie-policy.html> or <https://glycoleap.com/cookies-policy.html> as applicable.

For any child below 13 years of age, the rights to consent, access and correction can only be granted by their guardians. By using Holmusk's products and services, you are representing that you agree to the terms and conditions contained in this Privacy Policy and Holmusk's Terms of Use, and this agreement supersedes any other agreement that

we might have with you concerning the use of your personal data. If you do not agree to any of these terms and conditions, you should not use Holmusk's products and services. This Privacy Policy is governed by the laws of Singapore.