

PRIVACY POLICY

The Arcstone Privacy Policy was updated on 19 March 2021

Arcstone Pte. Ltd. ("Arcstone") is committed to protecting your privacy. This Privacy Policy details the steps Arcstone takes to protect your Personal Data when you interact with Arcstone by using products and/or services from Arcstone, which applies only when you use Arcstone's website or communicate with Arcstone through email, telephone, or in writing. It details how Arcstone collects, uses, discloses, transfers, and stores information you provide to Arcstone or which Arcstone otherwise collects from your usage of Arcstone products and/or services, including, but not limited to, "Personal Data" which means information, or a combination of pieces of information, that allow you to be identified.

By engaging in any interaction with Arcstone through the usage of Arcstone's products and/or services, you agree that Arcstone may process your Personal Data in the manner described in this Privacy Policy. Your use of Arcstone products and/or services and any information you provide through them is subject at all times to this Privacy Policy.

Important notice for residents of the European Economic Area (EAA) : EAA residents may be entitled to object to certain types of processing activities involving your personal data described in this privacy policy, including where Arcstone is relying on a legitimate interest to process your personal data or where Arcstone is processing your personal data for direct marketing. In some cases, Arcstone may demonstrate that Arcstone has compelling legitimate grounds to continue to process your personal data in which case Arcstone is not obliged to comply with your request.

1. COLLECTION OF INFORMATION

1.1 Information collected directly from you. Arcstone (or third parties acting on Arcstone's behalf) may collect your Personal Data through the interactions with Arcstone described above.

The Personal Data Arcstone collects from you may include information such as:

Identity data, such as your name, title, company/organization name, personal identification number, passport number, e-mail address, telephone and fax numbers and physical address (including street, city, state, postal code, and/or country), and camera or video footage that identifies individuals (including CCTV footage);

Registration data, such as information provided by you when you register for an account to use Arcstone products and/or services, including usernames and passwords;

Recruitment data, including information submitted in connection with a job application or inquiry (as described below);

Marketing data, including your responses to market surveys and contests conducted by Arcstone or on Arcstone's behalf;

Financial information, including credit card or other financial account information for the purpose of enabling Arcstone to facilitate your purchase of Arcstone products and/or services;

Transaction data, including inquiries about and orders for Arcstone products and/or services and details of payments to and from you;

Website data, including information on usage of Arcstone's website; and

Communication data, including feedback from you about Arcstone's products and/or services, and records of communications with Arcstone.

When you do not provide requested information, Arcstone may not be able to provide you the requested service or complete your transaction.

1.2 Information Arcstone collects about you. Arcstone collects certain information about your Interactions with Arcstone, including:

Usage data, including, but not limited to, information about how you use Arcstone's products and/or services, what pages you view, the number of bytes transferred, the links you click, the materials you access, the date and time you access Arcstone's products and/or services, the website from which you linked to one of Arcstone's products and/or services and other actions taken within the Arcstone's websites and applications; and

Technical data, including, but not limited to, your Internet Protocol (IP) address, your browser type and capabilities and language and your operating system.

1.3 Geo-location information. For certain products and/or services, with your express consent, Arcstone may collect the precise, real-time location (i.e., geo-location) of your mobile device. This information will be used only for purposes of facilitating your use of Arcstone products and/or services. The geo-location of your mobile device may be disclosed to Arcstone's service providers who may process this information in connection with providing services on Arcstone's behalf. Once you have consented to the collection of the precise, real-time location of your mobile device, you may adjust this consent by managing your Location Services preferences through the settings of your mobile device.

1.4 Information collected from third parties. In accordance with applicable law, Arcstone may collect Personal Data about you from third parties, such as social media websites/applications, which Arcstone may combine with the information Arcstone already holds about you in order to help Arcstone improve and customize Arcstone's products and/or services to your preferences and for other purposes set forth in this Privacy Policy.

2. USE OF INFORMATION

2.1 Arcstone may use the Personal Data collected via Arcstone's product and services or when you contact Arcstone for purposes that include:

Services and transactions. Arcstone may use your Personal Data to deliver services to you or carry out transactions you have requested, including, but not limited to, providing information on Arcstone products and/or services you have purchased or otherwise used, registering purchased products, processing product orders, handling warranty claims, replacing product manuals, answering customer service requests and facilitating the use of Arcstone's products and/or services.

Administering and protecting Arcstone's business, products, and services. Arcstone may use your Personal Data to administer and protect Arcstone's business, products, and services. Uses include, but is not limited to, troubleshooting, system maintenance, support, reporting and hosting of data.

Improving Arcstone's business, products, and services. Arcstone may use your Personal Data to perform business analyses or for other purposes that help Arcstone to develop and improve the quality of Arcstone's business, products, and services (including new products and services), for example, by improving Arcstone's website.

Marketing. In accordance with applicable laws and regulations, Arcstone may use your Personal Data to inform you of products or services which may be of interest to you, and to otherwise communicate with you about offerings, events and news, surveys, special offers, and related topics.

You are able to opt-out from marketing communications sent via e-mail at any time, free of charge by contacting Arcstone at contact@arcstone.co. Depending on your country of residence, you may also be able to opt out of other types of marketing communications; please contact Arcstone at contact@arcstone.co.

Employment applications. In connection with a job application or inquiry, you may provide Arcstone with information about yourself, such as a resume/curriculum vitae, professional references, information about education and job background, and information about professional training and certifications. Arcstone and Arcstone's affiliates may use this information for the purpose of employment consideration, and as otherwise set forth in any separate Privacy Policy or other notice made available to in connection with your application.

Research and analysis. Arcstone may use your Personal Data to conduct research and analysis, including but not limited to, market surveys, to help Arcstone analyze your purchasing preferences, identify the products and services that best meet your requirements and measure the effectiveness of the advertising Arcstone serves you.

Administering contests. Arcstone may use your Personal Data to conduct contests;

Enforcement. Arcstone may use the Personal Data Arcstone collects in order to detect, prevent and respond to fraud, intellectual property infringement, violations of Arcstone's terms and conditions, violations of law or other misuse of Arcstone's products and services.

Where permitted by law, Arcstone may combine the information that Arcstone collects via Arcstone's products and services with other information Arcstone holds about you (such as information about your use of Arcstone's products and services) in order to offer you an improved and consistent customer experience when interacting with Arcstone or for other purposes set forth in this Privacy Policy.

2.2 Arcstone takes reasonable steps to ensure that you are aware of:

the likely use of the information;

the means of requesting Arcstone on the provision of personal data that is in the possession of Arcstone;

the means of withdrawing any consent in respect of the collection, use or disclosure of the personal data that is in the possession of Arcstone;

the identity and contact details of the organisation;

any law requiring collection of the information; and

the main consequences of failure to provide the information.

3. LEGAL BASIS FOR INFORMATION PROCESSING

3.1 Where required by law, Arcstone will ensure there is a legal basis for the processing of your Personal Data. In most cases the legal basis will be that:

the processing is necessary for the performance of the services Arcstone provide to you;

the processing is necessary to comply with Arcstone's legal obligations, including compliance with applicable laws, regulations, governmental and quasi-governmental requests, court orders or subpoenas;

the processing is based on your consent to the processing of your Personal Data for one or more specified purposes (e.g. marketing);

the processing is necessary to meet Arcstone's legitimate interests, for example to develop and improve Arcstone's products and/or services, including, but not limited to, the Arcstone website, for the benefit of Arcstone's customers;

the processing is necessary for the protection of the personal safety of any individual.

4. ANONYMOUS INFORMATION

4.1 Arcstone allows individuals the option not to identify themselves when dealing with it, where practicable.

4.2 In accordance with applicable law, Arcstone may anonymize your Personal Data so that it can no longer be used to identify you. Anonymized information is not considered Personal Data and is

therefore not subject to this Privacy Policy. Arcstone may collect, use and share anonymized information for any purpose.

5. STORAGE OF INFORMATION

5.1 The period during which Arcstone store your Personal Data varies depending on the purpose for the processing. For example, Arcstone stores Personal Data needed to provide you with products and services, or to facilitate transactions you have requested, for so long as you are a customer of the Company.

5.2 Arcstone stores your Personal Data for marketing purposes until you have opted out of receiving further direct marketing communications in accordance with applicable law.

5.3 If you submit an employment application via Arcstone's website or in response to an Arcstone employment posting on a third-party site, Arcstone will retain details of your application as set forth in the Privacy Policy or other notice made available to you in connection with your application or as otherwise required by law.

5.4 In all other cases, Arcstone stores your Personal Data for as long as is needed to fulfill the purposes outlined in this Privacy Policy, following which time it is either anonymized (where permitted by applicable law), deleted or destroyed.

6. DISCLOSURE OF PERSONAL DATA

6.1 Arcstone may disclose your Personal Data with selected third parties in accordance with applicable law, including as set out below.

Our group companies. Arcstone may share your Personal Data with Arcstone's affiliates and group companies as reasonably necessary for the purposes set out in this Privacy Policy.

Service providers. Arcstone may share your Personal Data with companies with which Arcstone have contracted to provide services on Arcstone's behalf, including, but not limited to, hosting websites, conducting surveys, processing transactions, analyzing Arcstone's website and performing analyses to improve the quality of Arcstone's business, websites, products and services. Arcstone requires these service providers to protect the confidentiality of your Personal Data.

Distributors and other trusted business partners. Arcstone may share your Personal Data with third parties that distribute Arcstone's products and other trusted business partners for purposes that include allowing those third parties to send marketing communications to you. Such sharing of Personal Data for marketing purposes will be performed in accordance with applicable laws and regulations.

Disclosure in connection with transactions. In connection with certain transactions, Arcstone may disclose some or all of your Personal Data to financial institutions, government entities and shipping companies or postal services involved in the fulfillment of the transaction.

Disclosures in connection with acquisitions or divestitures. Circumstances may arise where for strategic or other business reasons the Company decides to sell, buy, divest, merge or otherwise reorganize businesses in some countries. Arcstone may disclose information that Arcstone maintains about you to the extent reasonably necessary to proceed with the negotiation or completion of a merger, acquisition, divestiture or sale of all or a portion of the Company's assets.

Disclosure for other reasons. Arcstone may disclose Personal Data if required or authorized to do so by law or in the good-faith belief that such action is necessary to comply with legal requirements or with legal process served on Arcstone, to protect and defend Arcstone's rights or property or, in urgent circumstances, to protect the personal safety of any individual.

7. SERVICES, APPLICATIONS AND PLATFORMS

7.1 Microsoft Teams Integration - Information collected directly from you. Arcstone (or third parties acting on Arcstone's behalf) may collect your Personal Data through the interactions with Arcstone described above. Personal Data may also be collected through Arcstone's products and modules for use on these applications and platforms, such as the arc.ops Teams App.

Services and transactions. Arcstone may use your Personal Data to deliver services to you or carry out transactions you have requested, including, but not limited to, providing information on Arcstone products and/or services you have purchased or otherwise used, registering purchased products, processing product orders, handling warranty claims, replacing product manuals, answering customer service requests, and facilitating the use of Arcstone's products and/or services.

Data Storage and Security. Arcstone may store your Personal Data for operational purposes of the Microsoft Teams application. Your information will only be utilized for application functionality and communication purposes. By utilizing Arcstone's services on applications such as Microsoft Teams and other third-party services, you acknowledge and agree that your Personal Data may be collected in, transferred to, stored by, processed, or disclosed on these platforms.

Improving Arcstone's business, products, and services. Arcstone may use your Personal Data to perform business analyses or for other purposes that help Arcstone to develop and improve the quality of Arcstone's business, products, and services (including new products and services), for example, for further development of the Microsoft Teams app.

8. INTERNATIONAL TRANSFERS

8.1 By using or accessing Arcstone's products and/or services or contacting Arcstone and providing your Personal Data to Arcstone, you acknowledge and agree that your Personal Data may be collected in, transferred to, stored by, processed, or disclosed to an overseas recipient, including, but not limited to, Arcstone employees, suppliers, distributors and other business partners and/or agents located in countries outside of your country or residence in accordance with applicable law.

8.2 Please be aware that the privacy protections and legal requirements, including the rights of authorities to access your Personal Data, in some of these countries may not be equivalent to those in your country of residence. However, Arcstone will take reasonable steps to protect your privacy and to provide a level of protection of Personal Data that is comparable to that of your country of residence.

Users Located in the European Economic Area (EEA)

Where required, Arcstone has put in place appropriate safeguards with Arcstone's group companies, service providers, contractors, distributors and other business partners and agents to ensure that transfers of Personal Data outside the EEA are adequately protected. These safeguards typically comprise the EU Standard Contractual Clauses in accordance with Article 46(2) of the EU General Data Protection Regulation. For more information on the appropriate safeguards in place to protect your Personal Data, please contact Arcstone using the details at the end of this Privacy Policy.

9. SECURITY

9.1 Protecting your Personal Data. Arcstone uses a variety of security technologies and procedures to help protect your Personal Data from unauthorized access, use or disclosure, including implementation of such security measures as may be required by applicable law. However, no information system can be 100% secure, so Arcstone cannot guarantee the absolute security of your Personal Data. Moreover, Arcstone is not responsible for the security of information you transmit to the Arcstone products and/or services over networks that Arcstone does not control, including the Internet and wireless networks. The safety and security of your Personal Data also depends on you. Where Arcstone have given you (or where you have chosen) a User ID and password to access the Arcstone sites, you are responsible for keeping those log-on credentials confidential and not revealing them to others.

9.2 Dealing with Unsolicited Information. Arcstone takes all reasonable steps to ensure that all unsolicited information is destroyed immediately.

10. WEBSITE USAGE

10.1 As with most websites, when you visit Arcstone’s website or use an application on Arcstone’s website, Arcstone may record anonymous information such as IP address (where not used to identify a specific individual), time, date, referring URL, pages accessed and documents downloaded, type of browser and operating system.

10.2 Arcstone’s website also uses “cookies”. A cookie is a small file that stays on your computer until, depending on whether it is a sessional or persistent cookie, you turn your computer off or it expires. Cookies may collect and store your personal data. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use Arcstone’s website, but may be limited in the use of some of the features.

10.3 Arcstone’s website may contain links to or from third-party websites. Arcstone has no liability or responsibility for those websites, products and services, their policies, or their collection or other processing of your Personal Data. The practices of those third parties with respect to information collected through their websites, products or services is governed by their own privacy policies. Arcstone encourages you to learn about the privacy policies of those third parties.

11. DO NOT TRACK

11.1 Some web browsers may transmit “do-not-track” signals to the Arcstone website with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. Arcstone currently does not take action in response to these signals.

12. EXERCISING YOUR RIGHTS

12.1 You may have certain rights with respect to Personal Data about you that is collected through the Arcstone products and/or services. If you are a resident of the EEA, the rights described below may apply to you. For other users, the rights that apply to you will depend on the laws of your country of residence. Arcstone will facilitate your exercise of the rights that apply to you in accordance with applicable law. For more information about your rights, please contact Arcstone using the contact details at the end of this Privacy Policy.

Access. You may have the right to access, review and correct Personal Data collected through Arcstone’s products and/or services. In some cases, you can do this by going to the page on which you provided the information. You can help Arcstone to maintain the accuracy of your information by notifying Arcstone of any change to your mailing address, phone number or e-mail address.

Object. You may be entitled to object to certain types of processing activities involving your Personal Data, including where Arcstone is relying on a legitimate interest to process your Personal Data or where Arcstone is processing your Personal Data for direct marketing. In some cases, Arcstone may demonstrate that Arcstone has compelling legitimate grounds to continue to process your Personal Data in which case Arcstone is not obliged to comply with your request.

Erasure. You may be entitled to request the erasure of your Personal Data, for example, where the information is no longer necessary for the purposes for which they were collected.

Restriction. You may be entitled to request that Arcstone restrict Arcstone's processing of your Personal Data, for example, where the accuracy of the information is contested by you.

Data portability. You may be entitled to receive and reuse your Personal Data for your own purposes. This is known as the right to data portability and, where applicable, requires Arcstone to move, copy or transfer your Personal Data from Arcstone's systems to you or (where technically feasible) a third-party chosen by you without affecting its usability.

Consent. If you have provided your consent to the processing of your Personal Data, you may withdraw your consent at any time by giving Arcstone reasonable notice by sending a written request by email to contact@arcstone.co. Arcstone shall inform the individual of the likely consequences of the withdrawal of the consent. Arcstone will cease to collect, process, or disclose the Personal Data upon such withdrawal unless permitted or required by the PDPA or other applicable laws and regulations in your country of residence.

13. INFORMATION BELONGING TO CHILDREN

13.1 Arcstone does not knowingly collect information from children and does not target or direct Arcstone Offerings to children. The meaning of "children" is subject to the laws and regulations in the jurisdiction in which you are located.

14. SENSITIVE INFORMATION

14.1 Arcstone does not collect sensitive information without the individual's consent and unless it is specifically relevant and necessary for Arcstone's primary purposes of conducting, improving, maintaining and developing a business relationship. All sensitive information is collected and used in accordance with this Privacy Policy. Arcstone does not use government identifiers (e.g. tax file numbers) to identify individuals.

15. DO NOT CALL REGISTRY ("DNC REGISTRY")

15.1 Arcstone complies with all provisions regarding the DNC Registry under the PDPA.

16. UPDATES TO PRIVACY POLICY

16.1 Arcstone reserves the right to modify this Privacy Policy at any time. When this Privacy Policy is modified, Arcstone will revise the “last updated date” at the top of the Privacy Policy. A current version of the Privacy Policy will be published on Privacy Policy page of Arcstone’s website (arcstone.co/privacy-policy) or may be obtained free of charge upon request.

17. CONTACT ARCSTONE

17.1 If you have any questions regarding this Privacy Policy, the information practices of the Arcstone Offerings, or your dealings with Arcstone, you may contact Arcstone via email at contact@arstone.co.

Please note that email communications are not always secure, so please do not include credit card information or other sensitive information in your emails to Arcstone.