PRIVACY POLICY

Please read this privacy notice (“Privacy Notice”) carefully as it describes our collection, use, disclosure, retention and protection of your personal information. This Privacy Notice applies to any website, application or service which references this Privacy Notice. Where you provide us with or we collect your personal information in any of the ways described in section 2 below, you agree that we may collect, store and use it: (a) in order to perform our contractual obligations to you; (b) based on our legitimate interests for processing (i.e. for internal administrative purposes, data analytics and benchmarking (see section 3 below for more information), direct marketing, maintaining automated back-up systems or for the detection or prevention of crime); or (c) based on your consent, which you may withdraw at any time, as described in this Privacy Notice.

This Privacy Notice may be relevant to you even if you are not a customer or a direct contact of ours and have never used a website, application or service of ours. We may have your personal information because we have received it from a user of a website, application or service of ours.

1. Who we are

We are a deep tech company located in Singapore, 20 Upper Circular Road, The Riverwalk #01-31, Singapore 058416.

2. How we collect information

To the extent permissible under applicable law, we collect information about you and any other party whose details you provide to us when you:

- register to use our websites, applications or services (including free trials); this may include your name (including business name), address, email address and telephone number. We may also ask you to provide additional information about your business and your preferences;
- place an order using our websites, applications or services; this may include your name (including business name), address, contact (including telephone number and email address) and payment details;
- use our applications, which may include the collection of metadata;
- complete online forms (including call back requests), take part in surveys, post on our message boards, post any blogs, enter any competitions or prize draws, download information such as white papers or other publications or participate in any other interactive areas that appear on our website or within our application or service;
- interact with us using social media;
- interact with us through our chatbots;
- provide your contact details to us when registering to use or accessing any websites, applications or services we make available or when you update those details; and
- contact us offline, for example by telephone, fax, SMS, email or post.

We will also collect your information where you only partially complete and/or abandon any information inputted into our website and/or other online forms and may use this information to contact you to remind you to complete any outstanding information and/or for marketing purposes.

We also collect information from your devices (including mobile devices) and applications you or your users use to access and use any of our websites,

applications or services (for example, we may collect the device identification number and type, location information and connection information such as statistics on your page views, traffic to and from the sites, referral URL, ad data, your IP address, your browsing history and your web log information). We may do these using cookies or similar technologies.

We may enhance personal information we collect from you with information we obtain from third parties that are entitled to share that information; for example, information from credit agencies, search information providers or public sources (e.g. for customer due diligence purposes), but in each case as permitted by applicable laws.

Providing us with information about others

If you provide us with personal information about someone else, you are responsible for ensuring that you comply with any obligation and consent obligations under applicable data protection laws in relation to such disclosure. In so far as required by applicable data protection laws, you must ensure that you have provided the required notices and have obtained the individual's explicit consent or otherwise have a legal basis to provide us with the information and that you explain to them how we collect, use, disclose and retain their personal information or direct them to read our Privacy Notice.

3. How we use your information

To the extent permissible under applicable law, we use your information to:

provide any information and services that you have requested or any applications or services that you have ordered;
compare information for accuracy and to verify it with third parties;

provide, maintain, protect and improve any applications, products, services and information that you have requested from us;
manage and administer your use of applications, products and services you have asked us to provide;
manage our relationship with you (for example, customer services and support activities);
monitor, measure, improve and protect our content, products, applications and services and provide an enhanced, personal, user experience for you;
undertake internal testing of our products , applications, systems and services to test and improve their security, provision and performance, in which case, we would pseudonymise any information used for such purposes, and ensure is it only displayed at aggregated levels which will not be linked back to you or any living individual;
provide you with any information that we are required to send you to comply with our regulatory or legal obligations;
comply with any other of our regulatory or legal obligations;
detect, prevent, investigate or remediate, crime, illegal or prohibited activities or to otherwise protect our legal rights (including liaison with regulators and law enforcement agencies for these purposes);
contact you to see if you would like to take part in our customer research (for example, feedback on your use of our applications, products and services);
to monitor, carry out statistical analysis and benchmarking, provided that in such circumstances it is on an aggregated basis which will not be linked back to you or any living individual except as permitted by law;
deliver targeted advertising, marketing (which may include in-product messaging) or information to you which may be useful to you, based on your use of our applications and services;
deliver joint content and services with third parties with whom you have a separate relationship (for example, social media providers); and

provide you with location-based services (for example, advertising and other personalised content), where we collect geo-location data.

To the extent permitted by applicable law, we retain information about you after your last usage of our products and services . This information will be held and used for as long as permitted for legal, regulatory, fraud prevention and legitimate business purposes.

Our website, applications (including mobile applications) and services may contain technology that enables us to:

check specific information from your device or systems directly relevant to your use of the products, applications or services against our records to make sure the products, applications or services are being used in accordance with our end-user agreements and to troubleshoot any problems;
obtain information relating to any technical errors or other issues with our products, applications and services;
comply with our legal or regulatory obligations;
collect information about how you and users use the functions of the features of ourproducts, applications and services; and
gather statistical information about the operating system and environment from which you access our applications or services.

You can manage your privacy settings within your browser or our applications and services (where applicable).

In addition to the purposes described in this section, we may also use information we gather to deliver targeted advertising, marketing (including in-product messaging) or information to you which may be useful, based on your use of the products, applications or services or any other information we

have about you (depending on the products, applications or services, you may able to configure these features to suit your preferences). Sections 5 and 6 of this Privacy Notice provides further details on how we will do this.

We may monitor and record our communications with you, including e-mails and phone conversations. Information which we collect may then be used for training purposes, quality assurance, to record details about our products, applications and services you order from us or ask us about, and in order to meet our legal and regulatory obligations generally.

Data analytics and benchmarking
We may use information generated and stored during your use of our services for our legitimate business interests to enable us to give you the best service and/or solutions and the best experience. These purposes include to:

deliver advertising, marketing (including in-product messaging) or information to you which may be useful to you, based on your use of services;
carry out research and development to improve our services, products and applications;
develop and provide new and existing functionality and services (including statistical analysis, benchmarking, insights, receipt recognition and cashflow forecasting services); and
provide you with location-based services (for example location relevant content) where we collect geo-location data to provide a relevant experience.

Please be aware that our use may include personal information of your individual clients, suppliers, employees and other individuals whose information you input into any of our products, applications or services.

Any individual whose personal information we process has the right to object

to processing based on our legitimate interests, and if you wish to do so, please contact us at contact@airesatech.com.

4. Sharing your information

We may share your information with:

- any company within Aires A.T Pte Ltd, for the purposes set out in this Privacy Notice, (e.g. global information and customer relationship management; software and service compatibility and improvements; and to provide you with any information, applications, products or services that you have requested);
- our service providers and agents (including their subcontractors) or third parties which process information on our behalf (e.g. internet service and platform providers, payment processing providers and those organizations we engage to help us send communications to you) so that they may help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you. We will hold it securely and only retain it for the period to;
- other entities may also be controllers of the data we share with them, such as academic or research organizations, who we may collaborate with to carry out research in the public interest or necessary for our own or another organization's legitimate interests, for example, to deliver valuable insights to our customers or to enable us to improve the service we offer you. In those circumstances, we will take additional steps to protect your personal data, including pseudonymisation or anonymisation and aggregation prior to sharing the data, to protect your privacy and the confidentiality of your data;
- partners, including system implementers, resellers, value-added resellers, independent software vendors and developers that may

help us to provide you with the applications, products, services and information you have requested or which we believe is of interest to you;
third parties used to facilitate payment transactions, for example clearing houses, clearing systems, financial institutions and transaction beneficiaries;
third parties where you have a relationship with that third party and you have consented to us sending information (for example social media sites or other third party application providers);
third parties for marketing purposes (e.g. our partners and other third parties with whom we work and whose products or services we think will interest you in the operation of your business activities. For example, financial services organizations (such as banks, insurers, finance providers), payment solutions providers, software and services providers that provide business solutions);
credit reference and fraud prevention agencies;
Government bodies, regulators and any other third party necessary to meet our legal and regulatory obligations;
law enforcement agencies so that they may detect or prevent crime or prosecute offenders;
any third party in the context of actual or threatened legal proceedings, provided we can do so lawfully (for example in response to a court order);
any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts;
our own and Aires A.T Pte Ltd professional advisors and auditors for the purpose of seeking professional advice or to meet our audit responsibilities;
another organization if we sell or buy (or negotiate to sell or buy) any business or assets;
another organization to whom we may transfer our agreement with you; and

Government departments where reporting is mandatory under applicable law.

We may share non-personally identifiable information about the use of our website, applications, products or services publicly or with third parties but this will not include information that can be used to identify you.

5. Marketing

From time to time, we may use your information to contact you with details about our applications, products and services which we feel may be of interest to you. We may also share your information with our group companies and carefully selected third parties so that they (or we) may contact you with information about their products or services which we feel may be of interest to you. We or they may wish to contact you for this purpose by telephone, post, SMS or email. You have the right at any time to stop us from contacting you for marketing purposes. You may also request at any time that we do not share your information with third parties referred to in this paragraph. If you wish to exercise these rights you can do so by selecting your contact preferences at the point where you provide us with your information on our websites, applications or services, using any preference centers we give you access to or by sending us an email to contact@airesatech.com You can also unsubscribe from any email marketing using the links provided in the emails we send to you.

Third party platform advertising

Where you respond to communications we post on third-party platforms (such as LinkedIn, Instagram, Facebook, Google and Twitter), we may also share your information with those third parties in order to serve targeted advertising/content to you via the relevant third party platform based on your profile/interests. Your information is used by the third-party platform provider to identify your account and serve advertisements to you. You can control what advertisements you receive via the privacy settings on the relevant

provider’s platform and you should consult the third party’s help/support center for more information.

6. Your information and your rights

If you are based within a jurisdiction having similar data protection laws, in certain circumstances you may have the following rights:

- the right to be told how we use your information and obtain access to your information;
- the right to have your information rectified or erased or place restrictions on processing your information;
- the right to object to the processing of your information e.g. for direct marketing purposes or where the processing is based on our legitimate interests;
- the right to have any information you provided to us on an automated basis returned to you in a structured, commonly used and machine-readable format, or sent directly to another company, where technically feasible (“data portability”);
- where the processing of your information is based on your consent, the right to withdraw that consent subject to legal or contractual restrictions;
- the right to object to any decisions based on the automated processing of your personal data, including profiling; and the right to lodge a complaint with the supervisory authority responsible for data protection matters.

If we hold any information about you which is incorrect or if there are any changes to your details, please let us know by so that we can keep our records accurate and up to date.

If you do not provide, or withdraw your consent to the use of your

personal information for purposes set out in our Privacy Notice, we may not be able to provide you with access to all or parts of our website, applications, and services.

We will retain your personal information for the duration of our business relationship and afterwards for as long as is necessary and relevant for our legitimate business purposes, in accordance with any Data Retention, Marking and Destruction Policy or as otherwise permitted by applicable laws and regulations. Where we no longer need your personal information, we will dispose of it in a secure manner (without further notice to you).

7. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. However we will not reduce your rights under this Privacy Notice. We will always update this Privacy Notice on our website, so please try to read it when you visit the website (the 'last updated' reference tells you when we last updated this Privacy Notice).

8. Security and storage of information

We will keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage. We will do our best to protect your personal information but we cannot guarantee the security of your information which is transmitted to our products, applications or services or to other websites, applications and services via an internet or similar connection. If we have given you (or you have chosen) a password to access certain areas of our websites, applications or services please keep this password safe – we will not share this password with anyone.

If you believe your account has been compromised, please contact us at contact@airesatech.com

9. Overseas transfer of personal information

Disclosure of personal information is protected by the relevant privacy and data protection laws of your jurisdiction, and not every country protects the information in the same way.

Our website and some of our applications or services or parts of them may be hosted across the world and this means that we may transfer any information which is submitted by you through the website the application or service outside your country of domicile. When you send an email to us, this will also be stored on our email servers which may be hosted in a country other than your country of domicile.

We may use service providers based outside of your country of residence to help us provide our website, applications and services to you (for example, platform and payment providers who help us deliver our applications and services, or advertising or execute your payments) and this means that we may transfer your information to service providers outside your country of domicile for the purpose of providing our applications, advertising and services to you.

We take steps to ensure that where your information is transferred outside your country of domicile by our service providers and hosting providers, appropriate measures and controls are in place to protect that information in accordance with applicable data protection laws and regulations.

For example, we may share information with our group companies or affiliates based outside Asia for the purposes envisaged by this Privacy Policy including in the United Kingdom and the United States. All our affiliated companies are subject to our data protection policies designed to protect data in accordance with the applicable data protection laws. In each case, such transfers are made in accordance with the applicable laws, including without limitation, the Privacy Act 1988 (Cth) of Australia, the Personal Data Protection Act 2012 of Singapore, the General Data Protection Regulations (“GDPR”) of EU 2016/679.

By using our applications, products or services or by interacting with us in the ways described in this Privacy Policy, you consent to the transfer of your information outside your country of domicile in the circumstances set out in this Privacy Policy. If you do not want your information to be transferred outside your country of domicile you should not use our website, applications or services.

10. Other sites and social media

If you follow a link from our website, application or service to another site or service, this Privacy Notice will no longer apply. We are not responsible for the information handling practices of any other third party sites or services and we encourage you to read the privacy notices appearing on those sites or services.

Our websites, applications or services may enable you to share information with social media sites, or use social media sites to create your account or to connect your social media account. Those social media sites may automatically provide us with access to certain personal information retained by them about you (for example any content you have viewed). You should be able to manage your privacy settings from within your own third party social media account(s) to manage what personal information you enable us to access from that account.

11. Cookies, analytics and traffic data

Cookies are small text files which are transferred from our websites, products, applications or services and stored on your device. We use cookies to help us provide you with a personalised service, and to help make our websites, applications and services better for you.

Our cookies may be session cookies (temporary cookies that identify and track users within our websites, applications or services which are deleted

when you close your browser or leave your session in the application or service) or persistent cookies (cookies which enable our websites, products, applications or services to "remember" who you are and to remember your preferences within our websites, applications or services and which will stay on your computer or device after you close your browser or leave your session in the application or service).

We may use the following different types of cookies:

Strictly necessary cookies

These are cookies which are needed for our websites, products, applications or services to function properly, for example, these cookies allow you to access secure areas of our website

Performance cookies and analytics technologies
These cookies collect information about how visitors and users use our websites, applications and services, for instance which functionality visitors use most often, and if they get error messages from areas of the websites, applications or services. These cookies don't collect information that identifies a visitor or user. All information these cookies collect is aggregated and therefore anonymous. We only use these cookies to improve how our website, applications and services work.

Functionality cookies
These cookies allow our websites, applications and services to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customise. They may also be used to provide services you have asked for. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Targeting or advertising cookies
Where available, these cookies are used to deliver adverts more relevant to

you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by advertising networks with the website operators' permission. They remember that you have visited a website and this information is shared with other organisations such as advertisers. Quite often targeting or advertising cookies will be linked to site functionality provided by the other organisation.

Web beacons and parameter tracking

We may also use cookies and similar software known as web beacons to count users who have visited our website or products after clicking through from one of our advertisements on another website or in emails and to collect details of any products or services purchased. These web beacons collect limited information which does not identify particular individuals. It is not possible to refuse the use of web beacons. However, because they are used in conjunction with cookies, you can effectively disable them by setting your browser to restrict or block cookies.

IP Address and traffic data

We may keep a record of traffic data which is logged automatically by our servers, such as your Internet Protocol (IP) address, device information, the website that you visited before ours and the website you visit after leaving our sites. We may also collect some site, application and service statistics such as access rates, page hits and page views. We are not able to identify any individual from traffic data or site statistics.

How to disable cookies

You may be able to configure your browser or our website, products, application or service to restrict cookies or block all cookies if you wish, however if you disable cookies you may find this affects your ability to use certain parts of our website, products, applications or services.

12. Further information

If you have any queries about how we treat your information, the contents of this Privacy Policy, your rights under any applicable local law, how to update your records, how to obtain a copy of the information that we hold about you, or to make a complaint regarding any aspect of the collection, access to, use or storage of personal information by us, please send us an email at contact@airesatech.com

We will consider your complaint promptly and may contact you to seek to resolve the matter.

When we contact you, we may ask for further information and we will let you know how we will try to resolve your complaint, and how long that may take. We may need to engage or consult with other parties in order to investigate and deal with your complaint, and we will keep records of your complaint and any resolution.