

Privacy Policy

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Welcome to Tifansi (the “Platform”), Where Fans take the Podium, provided to you by Tifansi Pty Ltd (ABN: 676148940) and is for private, non-commercial use. For purposes of these Terms, “you” and “your” means you as the user of the Services. When we say “we”, “us” or “our” we refer to Tifansi entities and staff.

We value your privacy and are committed to protecting it. This policy explains how we handle your personal information when you use our Platform. If you do not agree with our practices, please do not use our Platform.

1. What information we collect

We may collect the following information about you:

1.1. Information You Provide

Your profile details. Your profile details can include your username, date of birth (if provided), email address, phone number, profile information, and profile photo or video. You provide this information when you register on our Platform. We may also ask you for your residential and postal address for the purposes of you collecting prizes won in our competitions.

Purchase information. When you make a purchase on our Platform, we collect information about the transaction, including payment details, billing address, shipping information, contact details, and the items you bought.

Proof of Identity or Age. We might ask for proof of identity or age for features like security, user creation, access to groups and communities, verified accounts and validate contest and winner eligibility, to ensure you're old enough to use our Platform.

Correspondence. We collect information from your messages when you contact us for support or feedback.

Testimonials. We collect your testimonials including images and videos of you when you win one of our prizes.

Surveys and Events. We collect information when you participate in surveys, research, promotions, contests, marketing campaigns, challenges, competitions, or events we conduct or sponsor.

1.2. Automatically Collected Information

Usage Information. We collect information about how you use our Platform, such as the content you interact with, ads you see, videos you watch, browsing history, saved content, followed users, and interactions with mutual followers.

Inferred Information. We may use your activity to infer your interests and age range to personalise content.

Technical Information we collect about you. We collect information about your device, like your IP address, user agent, carrier, time zone, ad identifiers, device model, system, network type, device IDs, screen resolution, operating system, app and file details, keystroke patterns, battery status, audio settings, and connected devices. If you use multiple devices, we'll use your profile to track your activity across them. We might also associate you with information from devices you don't use to log in.

Location Information. We collect your approximate location based on your SIM card or IP address. With your permission, we can also collect precise location data such as GPS.

Cookies. We use cookies and similar technologies (like web beacons) to collect information, analyse how you use our Platform, personalise your experience, improve our Platform, show you

ads, and measure ad effectiveness. We also use cookies to promote our Platform on other Platforms. Cookies allow our Platform to function properly. Web beacons are small images that help track cookies, page views, and other information from your device. To learn how to manage cookies, see the "Your rights and choices" section below.

We may aggregate or de-identify the information described above. Aggregated or de-identified data is not subject to this Privacy Policy.

1.3. Information From Other Sources

We may receive the information described in this Privacy Policy from other sources, such as:

If you choose to register or use the Platform using a third-party social network account details (e.g., Apple or Google) or login service, you will provide us or allow the third party to provide us with your username, public profile, and other possible information related to such an account. We will likewise share certain information with your social network such as your app ID, access token and the referring URL.

Advertisers, analytics providers, and other partners share information with us about your activities outside of our Platform, like what you do on other websites, apps, or in stores. This includes products or services you bought. They also share information like mobile ad identifiers, hashed email addresses, and cookie identifiers. We use this information to connect your activities outside our Platform with your Tifansi account.

We may obtain information about you from certain partners and affiliated entities within our corporate group, including about your user username and activities on their Platforms.

We might get information about you from others, like if you're mentioned in user content, messages, complaints, or requests. We might also collect information from publicly available sources.

Merchants and payment providers might share information with us about you, like payment confirmation details after you pay for a subscription.

2. How we use your information

We use your information to improve, support, and manage our Platform, let you use its features, and enforce our terms. We might also use it to personalise content, promote our Platform and affiliated partners services. Here's how we use your information:

- **Fulfil requests:** We use your information to fulfil requests for products, services, support, and information for internal operations like troubleshooting, data analysis, testing, research, and surveys.
- **Personalise content:** We tailor the content you see on our Platform based on your settings and past interactions.
- **Send promotions:** We might send you promotional materials from us or our trusted partners.
- **Improve our Platform:** We use your information to improve and develop our Platform.
- **Measure and deliver ads:** We measure ad effectiveness and deliver targeted ads to you.
- **Support engagement features:** We help you connect with others, share your activity, use our messaging service, suggest accounts, and interact with user content.
- **Promote our Platform:** We use user content in our advertising and marketing campaigns to promote our Platform and affiliated partner services, invite you to events, and highlight popular topics.
- **Understand your usage:** We analyse how you use our Platform across your devices.
- **Infer additional information:** We estimate your age range and interests.
- **Detect and combat abuse:** We help prevent abuse, harmful activity, fraud, spam, and illegal activity.
- **Ensure effective content presentation:** We present content in the best way for you and your device.
- **Promote safety and security:** We scan, analyse, and review content, messages, and metadata for violations of our terms, guidelines, or policies and to ensure our Platform stays safe and engaging for our users.
- **Facilitate independent research:** We support research conducted by independent researchers.
- **Verify identity or age:** We might verify your identity or age.
- **Prize collection:** We will coordinate collecting prizes for winners of our contests.
- **Communicate with you:** We communicate with you, including notifying you of changes.

- **Announce contest winners:** We announce winners of contests or promotions and send prizes.
- **Enforce terms:** We enforce our terms, guidelines, and policies.
- **Provide location-based services:** With your permission, we offer location-based services like ads and personalised content.
- **Train and improve technology:** We use your information to train and improve our machine learning models and algorithms.
- **Facilitate sales, promotion, purchases, and user support:** We support sales, promotions, purchases, and provide user support.

3. How we share your information

We share your information with the following parties:

3.1. Business Partners

If you choose to register to use the Platform using your social network account details (e.g., Apple or Google), you will provide us or allow your social network to provide us with your phone number, email address, username and public profile. We'll also share information with your social network.

We may share your username, preferences and activity on our platform with affiliated partners to allow them to market their services to you.

When you share content on social media, the video, username, and text will be shared on that Platform. If you share via messaging apps like WhatsApp, a link to the content will be shared.

3.2. Service Providers

We share information with service providers who help us run our business, like cloud providers and content moderation services. These help keep our Platform safe and enjoyable. We also share information with service providers who help us market our Platform.

Payment processors and transaction fulfilment providers: If you make payments, we share data with the relevant payment provider to process your transaction.

Analytics providers: We use analytics providers to improve our Platform and serve targeted ads.

3.3. Advertisers, Advertising Networks, and Measurement Partners

We share information with advertisers and measurement companies to track how many users have seen or clicked on ads.

If you use the free version of Tifansi, we share information with advertising networks to show you personalised ads on the Tifansi app and other places online. We're not responsible for the privacy practices of these third parties, and their information practices are not covered by this Privacy Policy.

3.4. Independent Researchers

We may share your information with independent researchers to facilitate research that meets certain criteria.

3.5. Our Corporate Group

We might share your information with other companies in our corporate group to provide the Platform services, improve the services, prevent illegal use, and support users.

3.6. For Legal Reasons

We might share your information with law enforcement, government agencies, or other organisations if required by law or necessary to:

- Comply with legal obligations.
- Enforce our terms, agreements, policies, and standards, including investigating violations.
- Detect, prevent, or address security, fraud, or technical issues.
- Protect our rights, property, or safety, or that of our users, a third party, or the public, as allowed by law (including sharing information with other companies for fraud protection and credit risk reduction).

3.7. Public Profiles

If your profile is public, anyone on the Platform can see your content. Your fellow fans, followers, search engines, content aggregators, and news sites might also access or share it.

3.8. Business Transactions

We might share your information with third parties:

- If we sell or buy a business or assets.
- If we merge with or partner with other companies.

In these cases, your information might be transferred as part of the transaction.

3.9. Merchants, Payment and Transaction Fulfilment Providers, and Other Service Providers

When you buy something on our Platform, we share your order details, contact information, and address with merchants, payment providers, and other service providers to process your order. They might use this information according to their privacy policies.

4. Where we store your information

Your information might be stored on servers in countries like Australia, Europe, UK, and the United States. We plan to use servers worldwide to provide our services globally and continuously. Similarly we use third party services whose infrastructure may be in other countries as stated in their Privacy Policies and Data Processing Agreement documents.

5. Your rights and choices

Data Control: You have certain rights over your information under applicable laws. These may include:

- Accessing, deleting, updating, or correcting your data.
- Knowing how your data is processed.
- Filing complaints with authorities.
- Potentially other rights.

You can submit a request to exercise these rights by submitting your request to privacy@tifansi.com. You can also appeal decisions about your requests by following the following instructions:

Local Representative: See the Supplemental Terms below for information on local representatives in your country (if available).

Managing Your Information:

- **Profile and Content:** You can access, edit, and delete most of your profile information directly through the app. You can also delete content you've uploaded.
- **Privacy Settings:** The Platform offers settings to edit and delete your uploaded content or your entire account if you choose.
- **Managing Cookies:** You can adjust your device browser settings to refuse or disable cookies. Each browser is different, so consult your browser's instructions.

Important Notes:

- Disabling cookies completely may limit some Platform functionalities.
- Opting out of cookies on one device may not automatically opt you out on another device. You may need to manage cookies on each device individually.

6. Security of your information

Data Security. We take steps to protect your information securely, but internet transmission is not completely secure. While we use reasonable measures like encryption, we cannot guarantee the security of your data transmitted through our Platform. Any transmission is at your own risk.

We have technical and organisational measures in place to protect your data. We regularly review and update these measures to improve our systems' overall security.

We might include links to other websites. These websites have their own privacy policies, and we're not responsible for them. Please check their policies before submitting any information.

We might update this policy from time to time. When we do, we'll notify you by changing the "Last Updated" date at the top and posting the new policy or providing other required notices. By continuing to use our Platform after an update, you agree to the new policy. If you don't agree, stop using our Platform.

7. How long we keep your information

We keep your information for as long as needed to provide our Platform and for other purposes stated in this policy. We also keep it to comply with legal obligations, when it's in our legitimate business interest (like improving our Platform and enhancing its safety, security, and stability), and for legal claims.

How long we keep information depends on the type of information and how we use it. For example, we keep profile information as long as you have an account. If you violate our terms, guidelines, or policies, we might remove your profile and content from public view but still keep other information to address the violation.

8. Children and teens

Tifansi is not intended for children under 16 (or a higher age in certain regions due to local regulations).

At Tifansi, we prioritise the safety and privacy of all users, especially young people. Because of this commitment, we follow the Children's Online Privacy Protection Act (COPPA). This law ensures that online Platforms obtain permission from parents or guardians before collecting any personal information from children under 16.

We do not collect or request any personal details from users under 16. If you are under 16, we kindly ask that you refrain from creating an account or sharing any personal information with us.

If, in any unlikely event, we discover that we may have unintentionally collected information from a child under 16, we will take immediate steps to delete that information. If you have any concerns that a child under 16 may have provided us with personal information, please don't hesitate to contact us at privacy@tifansi.com.

9. General Data Protection Regulation (GDPR)

For users residing in the European Economic Area, in accordance with the General Data Protection Regulation (Regulation EU 2016/679) and applicable laws, Tifansi Pty Ltd acts as both a Data Controller and, where relevant, a Data Processor. As Data Controller, Tifansi determines

the purposes and means of processing your personal data and is responsible for ensuring that all processing activities comply with the GDPR. As Data Processor, Tifansi may process personal data on behalf of other controllers, strictly following their documented instructions and in accordance with contractual obligations.

Tifansi processes your personal data fairly, lawfully, and transparently for the purposes of providing, managing, and improving access to Tifansi services, as described in our Terms of Service and Privacy Policy. If you participate in competitions and win a prize, your personal data will also be processed to manage and deliver your prize. The lawful basis for this processing is the necessity to perform our contractual relationship with you, as set out in our Terms of Service and Privacy Policy.

Where Tifansi acts as a Data Processor on behalf of another Data Controller, Tifansi will only process your personal data in accordance with the instructions provided by that Controller, implement appropriate technical and organisational measures to protect your data, and assist the Controller in fulfilling their GDPR obligations.

Providing your personal data is necessary for participation in Tifansi services. Without such data, Tifansi cannot fulfil its service obligations.

You have the right, free of charge and at any time, to:

- Object to processing based on Tifansi's legitimate interests or withdraw consent where processing is based on consent
- Access your personal data
- Rectify inaccurate or incomplete data
- Request deletion of your personal data
- Restrict processing under certain conditions
- Request data portability

To exercise these rights, contact our Data Protection Officer at privacy@tifansi.com with proof of your identity.

If you believe your data protection rights have been violated, you may file a complaint with your national data protection authority or the Office of the Australian Information Commissioner (OAIC).

For domain-related inquiries, contact privacy@tifansi.com.

10. Updates or changes to our Privacy Policy

We may update this Privacy Policy from time to time. When we update the Privacy Policy, we will notify you by updating the “Last Updated” date at the top of this policy and posting the new Privacy Policy or providing any other notice required by applicable law. Your continued access to or use of the Platform after the date of the updated policy constitutes your acceptance of the updated policy. If you do not agree to the updated policy, you must stop accessing or using the Platform.

Contact

If you have questions, comments, complaints or requests regarding this Privacy Policy, please contact us at: privacy@tifansi.com

We will try to address your request as quickly as possible. You also have the right to file a complaint with a relevant data protection authority, if applicable.

11. Supplemental Terms – Jurisdiction-Specific

In the event of a conflict between the provisions of the Supplemental Terms – Jurisdiction-Specific that are relevant to your jurisdiction from which you access or use the services, and the rest of policy, the relevant jurisdictions’ Supplemental Terms – Jurisdiction-Specific will supersede and control.

11.1. Argentina

If you are using our services in Argentina, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this Policy, the following terms shall prevail.

Your rights and options

According to Law No. 25,326, Regulatory Decree No. 1558/2001 and the provisions and/or binding resolutions issued by the Agency for Access to Public Information ("AAIP"), you have the following rights with respect to your personal data: access, rectification and deletion regarding data protection. You can exercise your rights by sending your request to privacy@tifansi.com.

We encourage you to contact us if you are not satisfied with how we have responded to any of your rights requests. You also have the right to lodge a complaint with the AAIP. You can contact AAIP through the site: [Conocé tus derechos respecto a tus datos personales](#).

11.2. Australia

If you are using the Platform in Australia, the following additional terms shall apply.

Certain entities in our corporate group, located outside of Australia, are given limited remote access to your information so that they can provide certain functions, as described in the section on "How we share your information". Please see here for further information on the countries in which our corporate group entities which receive personal information from Australia are located.

We adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [OAIC](#).

11.3. Brazil

If you are using the Platform in Brazil, the following additional terms apply. If any conflict arises between the main Privacy Policy and the additional terms, the following terms shall prevail:

Exercise of data protection rights. Brazilian law provides certain rights to individuals with regard to their personal data. Thus, we seek to ensure transparency and access controls in order to allow users to benefit from the mentioned rights.

We will respond and/or fulfil your requests for the exercise of your rights below, according to the applicable law and when applicable, to the Brazilian General Data Protection Law - LGPD:

1. confirmation of whether your data are being processed;
2. access to your data;
3. correction of incomplete, inaccurate or outdated data;
4. anonymization, blocking or erasure of data;
5. portability of personal data to a third party;
6. object to the processing of personal data;
7. information of public and private entities with which we shared data;
8. information about the possibility to refuse providing personal data and the respective consequences, when applicable;
9. withdrawal of your consent.
10. request a review of decisions made solely based on automated processing of personal data affecting your interests, including decisions made to define your personal, professional, consumer or credit profile, or aspects of your personality.

We encourage you to contact us if you are not satisfied with how we have responded to any of your rights requests. You also have the right to lodge a complaint with the Brazilian Data Protection Authority (ANPD).

Verifying your identity: For your safety and to allow us to make sure that we do not disclose any of your personal data to unauthorised third parties, in order to verify your identity and guarantee the adequate exercise of your rights, we may request specific information and/or documents from you before we can properly respond to a request received concerning your data. All data and documents received from you in the process of responding to your requests will be used for the strict purposes of analysing your request, authenticating your identity, and finally responding to your request.

Limitations to your rights: In certain situations, we may have legitimate reasons not to comply with some of your requests. For instance, we may choose not to disclose certain information to you when a disclosure could adversely impact our business whenever there is a risk of violation to our trade secrets or intellectual property rights. In addition, we may refrain from complying with a request for erasure when the maintenance of your data is required for complying with legal or regulatory obligations or when such maintenance is required to protect our rights and interests in case a dispute arises. Whenever this is the case and we are unable to comply with a request you make, we will let you know the reasons why we cannot fulfil your request.

Contact: In case of doubt about your privacy, your rights or how to exercise them, please contact us through the form "Contact". If you have any questions about the processing of your personal data, we would like to clarify them.

DPO: If you wish to reach our Data Protection Officer, contact us at: privacy@tifansi.com

Access Logs. We keep your application access logs, under confidentiality, in a controlled and safe environment for at least 6 months, in order to comply with legal obligations.

International Transfers. International data transfers are necessary for us to provide our services. If you are located in Brazil, we will always rely on one of the international data transfer mechanisms under applicable data protection laws and regulations.

11.4. Canada

If you are using the Platform in Canada, the following additional terms apply.

Information Relating to Children and Teens. Please note that if you are a resident of the Province of Quebec, you are only permitted to use the Platform if you are at least 16 years old.

Your Rights. Subject to limited exceptions under applicable law, you have the right to access, update, rectify and correct inaccuracies in your personal information and to withdraw your consent to our collection, use and disclosure of your personal information. To exercise these rights, you may contact us using the contact information set out below. We may require certain

personal information for the purpose of verifying the identity of the individual making the request or that they are authorised to act on behalf of another individual in such matters.

Your Choices. You can unsubscribe from our marketing emails at any time by clicking the “unsubscribe” link included at the bottom of each email we send.

Internal Policies and Access Controls. We implement and maintain internal policies and technical measures to restrict access to your personal information within our organisation. Access to personal information within our organisation is limited to employees who need the information to perform their job functions. For example, our customer support team may have access to certain types of information during our interactions with you, such as responding to complaints and inquiries. Similarly, our content moderators may access certain information in order to enforce our Terms of Service, Community Guidelines, and other conditions and policies.

Data Retention Practices. We have procedures in place to limit the retention periods as set out in the “How Long We Keep Your Information” section above. When personal information is no longer needed for these purposes or is no longer required to be retained by law, we take appropriate steps to dispose of it securely in accordance with our internal procedures.

Transfer Outside Your Jurisdiction. We and our service providers (including members, subsidiaries, or affiliates of our corporate group) may access, store and otherwise process personal information outside of Canada (and, for residents of Quebec, outside of Quebec), including in the United States, Australia, Singapore, and other foreign jurisdictions where we or our service providers are located. For information about how we or our service providers (including service providers outside Canada) process personal information, please contact us using the contact information set out below. We and our service providers may disclose your personal information if we are required or permitted by applicable law or legal process, which may include lawful access by foreign courts, law enforcement or other government authorities in the jurisdictions in which we or our service providers operate.

11.5. Egypt

If you are using our services in Egypt, the following additional terms apply.

You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 16 and that you have read and acknowledged Tifansi's Privacy Policy and Terms of Use and agree to the use by your child of the Platform and registration for an account.

11.6. Indonesia

If you are using our services in Indonesia, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall apply.

Age, Parental and Guardian Consent. By accessing and/or using this Platform, you represent that you are at least 21 years of age or married or not under guardianship. If you are below 21 years old and you are not married, or under guardianship:

- you must obtain approval from your parent(s) or legal guardian(s); and
- your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iii) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections.
- If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or guardian(s) is not willing to open the account under their name, you must cease accessing the Platform.

Your Choices.

You may request Tifansi to (i) disclose the history of personal data that we have collected; and/or (ii) erase and dispose of your personal data that we have collected on our server. Please note that by requesting us to erase and dispose of your personal data, you may not be able to use some of Tifansi's features and functionality.

To exercise any of your rights, contact us at: privacy@tifansi.com

Notification. In the event of any breach of personal data, we will notify you and provide you with information regarding such breach of personal data.

Data retention. We retain your information for as long as it is necessary to provide you with the service. Where we do not need your information in order to provide the service to you, we retain it only for so long as we have a legitimate business purpose in keeping such data. However, there are occasions where we are likely to keep this data for five (5) years (or longer if required) in accordance with our legal obligations or where it is necessary for the establishment, exercise or defence of legal claims.

After you have terminated your use of our Platform and the five (5) years retention period has lapsed, we store your information in an aggregated and anonymised format. Non-personally identifiable information may be retained indefinitely for analytics.

11.7. Israel

If you are using our services in Israel, the following additional terms apply.

You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 16 and that you have read and acknowledged Tifansi's Privacy Policy and Terms of Use and agree to the use by your child of the Platform and registration for an account.

11.8. Mexico

If you are using our services in Mexico, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

How we use your personal data.

Almost all purposes of processing stated in this section of the main Privacy Policy are necessary purposes. However, the following are secondary purposes:

Provide you with personalised advertising. The above purposes are not necessary for us to provide the Platform but allows us to provide you with a better experience. We offer you the possibility to take decisions regarding how we use and disclose your personal data. You can always limit the secondary purposes of personalised advertising by using the tools in Settings that allow you to limit certain functions.

We use both human and automated means to process your data.

How we share your personal data. We may share your personal data to a third party for purposes other than processing on behalf of us. We will obtain your consent for such sharing as required by applicable laws.

By providing us with your personal data and using our Platform you agree to the transfers that require your consent. You can always revoke your consent and exercise your rights, as stated below.

Your Rights. You have the following rights with respect to your personal data: access, rectification, cancellation, opposition, consent withdrawal, limitation to the use and disclosure of your data. You can exercise your rights by sending your request to privacy@tifansi.com . To know more about the applicable requirements and procedure to exercise your rights, contact us to the mentioned email address. If you are under 18 years, you may exercise your rights through a parent or guardian. Your rights requests will be resolved as soon as possible according to the nature of your request.

Information relating to children. You may review our parental consent section in the Terms of Service.

11.9. Philippines

If you are using our services in the Philippines, the following additional terms shall apply pursuant to the relevant laws, rules and regulations and issuances by the Philippines National Privacy Commission (“NPC”) on data privacy.

Your Rights. To the extent that the relevant laws, rules and regulations on data privacy recognize your rights and freedoms as data subjects, you shall have the right to information, object, access, rectification, erasure or blocking, lodge complaints before the NPC, damages and data portability. Before we can respond to a request to exercise one or more of the rights listed above, you may be required to verify your identity or your account details.

11.10. Russia

What are legal grounds for data processing. When we process your personal data, we rely on the grounds of your consent, performance of a contract, our legitimate interest and obligations to process personal data, or when we are so required by law.

By signing up and using the Platform, you consent to the processing of personal data in accordance with this Privacy Policy.

11.11. South Africa

If you are using our services in South Africa, the following additional terms apply.

You declare that you are over the age of 18. If you are under the age of 18, please have your parent or legal guardian read this with you. If you are reviewing these terms as the parent/legal guardian of a user who is under the age of 18, you hereby declare that such user is above the age of 16 and that you have read and acknowledged Tifansi’s Privacy Policy and Terms of Use and agree to the use by your child of the Platform and registration for an account.

11.12. South Korea

If you are using our services in South Korea, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

How we share your personal data. In addition to the main text of this policy, in the event we use information such as user-generated content and video content on our Platform as part of our advertising and marketing campaigns to promote the Platform, your personal data contained in such information may be disclosed to the recipients of such advertising or marketing content.

Data retention. We destroy personal data whose purpose of collection as consented to by you have been achieved, or whose periods of and use to which you consented to or which were provided in this privacy policy have expired; provided, however, we will continue to store your personal data for the following statutorily-prescribed periods, where applicable, including, but not limited to: Act on Consumer Protection in

Electronic Commerce. Records on your cancellation of an order, your payment on a purchased item, and our supply of a good/service: 5 years; Records on the handling of consumer complaints or disputes: 3 years; Records on advertisements and labels: 6 months. Protection of Communications Secrets Act. Records on your visits to our website: 3 months

Destruction of Personal data. We destroy your personal data in a manner that renders it unrestorable by the relevant department.

Data rights. You have the right to access personal data we hold about you, to rectify any personal data held about you that is inaccurate, to request the deletion of personal data held about you, and the right to request the suspension of the processing of your personal data. You can exercise your rights by contacting us at

privacy@tifansi.com

Data Security. We work hard to protect Tifansi and our users from unauthorised access to or unauthorised alteration, disclosure or destruction of information we hold. To this end, we have in place technical, managerial and physical safeguards, including internal policy for data protection, limiting the access to personal data on a need-to-know basis and controlling access to the facilities where personal data is processed.

Information Relating to Children. Tifansi is not directed at children under the age of 16.

11.13. Vietnam

If you are using our services in Vietnam, the following additional terms apply. In the event of any conflict between the following additional terms and the provisions of the main body of this policy, the following terms shall prevail.

Methods of processing your personal data. We may process your personal data by manual or automated methods.

Data subject's rights and obligations. Subject to certain exceptions, you have statutory rights and obligations under applicable laws. In particular, you have the following statutory rights:

- Right to know;
- Right to consent and withdraw consent;
- Right to access;
- Right to delete data;
- Right to restrict data processing;
- Right to be provided with data;
- Right to object data processing;
- Right to complain, denounce or initiate lawsuits;
- Right to claim for damages; and
- Right to self-protection.

You may exercise these rights by contacting us through the details in the Contact section, and we will respond to your requests regardless of the location in which your data is stored.

You have the following statutory obligations:

- Protect your own personal data;
- Request other relevant organisations and individuals to protect your personal data;
- Respect and protect personal data of others;
- Provide complete and accurate personal data upon giving consent to the processing of your personal data; and
- Other obligations under applicable laws.

Age, Parental and Guardian Consent. If you are below 16 years old or under guardianship: you must obtain approval from your parent(s) or legal guardian(s); and your parent(s) or legal guardian(s) are responsible for: (i) all your actions in connection with your access to and use of the Platform; (ii) your compliance with this policy; and (iii) ensuring that any of your participation in the Platform will not, in any event, result in any violation of applicable laws and regulations relating to child protections. If you do not have consent from your parent(s) or legal guardian(s) and your parent(s) or legal guardian(s) is not willing to open the account under their name, you must cease accessing the Platform if you are not at least 16 years of age.