



PRIVACY POLICY

Figtech Private Limited is a company incorporated and registered in Singapore, formerly “Feige”, trading as “**Friz**” (the “**Company**”) with the following Unique Identity Number (UEN) **202012187M**. For the purpose of this Privacy Policy, “**you**”, “**your**” or “**user/s**” as used herein refers to Friz’s customers or end-users accessing or using the Platform for the Services; and “**we**”, “**our**” or “**us**” means Friz, and/or any third-party service providers rendering certain Services on the Platform. This privacy policy (the “**Privacy Policy**” or “**Policy**”) sets out the basis on which we collect and handle certain information that we may collect and/or receive from you via the use of the Platform.

I. POLICY UPDATES AND APPLICABILITY

- This Privacy Policy applies to current and former visitors to the Platform. By visiting and/or using/downloading the Platform, you are accepting and consenting to the practices described in this Privacy Policy. The statements & procedures mentioned under this Privacy Policy must be read in conjunction with our Terms of Use.
- Unless otherwise specifically defined in this Privacy Policy, the terms defined in the Figtech Terms of Use shall apply to this Privacy Policy. Unless otherwise specifically defined as per the Privacy Policy or the Terms of Use, the terms shall be defined as per applicable law. With respect to this subject matter, in the event of any conflict between the Privacy Policy and any and all prior or contemporaneous documents, agreements or policies, the Privacy Policy shall prevail.
- You accept this Privacy Policy when you visit the Friz Platform, sign up for, access, or use our products, services, content, features, technologies, or functions offered on our Website and all related sites, App, and Services (collectively referred to as “**Friz Services**”).
- Changes may be made to this Privacy Policy from time to time without prior notification. To make sure that you are aware of any changes, kindly review the Privacy Policy updates periodically.
- This Privacy Policy applies to the Personal Information, which means any information (including name, national identity number, date and place of birth, biometric records, financial information etc), documents or details that relates to a natural person, which either directly or indirectly in combination with other information available with the Company, can identify such a person.

II. INFORMATION COLLECTED

We collect the following types of personal information when you access or use our Platform, in order to facilitate your use of Friz Services and to help improve your experience. We also collect information about your transactions and your activities:

- Contact information such as your name, address, phone number, email, and other similar information;
- Personal information such as your date of birth and information imported from third-party applications and platforms;
- Information provided as required during registration on the Platform;
- Income proof, credit card number, transactional information, billing information and financial information such as the full bank account numbers and/or credit card numbers that you link to your Friz account or give us when you use Friz Services;
- When you use Friz Services, we collect information sent to us by your computer, mobile phone or other access devices. The information sent to us includes, but is not limited to, the following: data about the pages you access, computer IP address, device ID or unique identifier, device type, geo-location information, computer and connection information, mobile network information, statistics on page views, traffic to and from the sites, referral URL, ad data, and standard web log data and other information.
- We may also collect information from or about you from other sources, such as through your contact with us, including our customer support team, results of any survey or questionnaire with us, when you report any problem to us or provide feedback when you use certain features on our Platform, your interactions with Friz or other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control (whether in part or whole).
- We work with third parties and we may receive information about you from them, for example, business partners, third-party service providers, sub-contractors, analytics providers, search information providers, or credit reference agencies.

III. EXPRESS CONSENT

- You expressly consent to Friz (including its marketing channels, business partners and third-party service providers) to provide the details/documents/information mentioned hereinabove for the purpose stated under this Privacy Policy.
- You while providing your details/documents over the Platform, including the personal information or other information as mentioned hereinabove, expressly consent to Friz (marketing channels, business partners and third party service providers) to contact you via SMS, call and/ or e-mail and to follow up calls in relation to the Friz Services provided through the Platform, for imparting product knowledge, offering promotional offers running on the Platform and various other offers offered by its business partners and third party service providers.
- You hereby authorize and expressly consent us to share your personal information with third parties including banks, credit information bureaus, moneylenders, excluded moneylenders, government agencies for completion of the services availed.
- You hereby grant your unambiguous, free and express consent to authorize and appoint Friz to request and obtain, collect, receive and/or fetch your financial information, credit information for and on your behalf;
- Companies we plan to merge with or be acquired by or, in the event of any bankruptcy, a bankruptcy estate. Should such a combination occur, we will request that the new combined entity follow this Privacy Policy with respect to your personal information. If this Privacy Policy

will be amended in connection with such a combination, you will receive prior notice and the opportunity to communicate preferences you may have, if applicable.

- Law enforcement, government officials, or other third parties when compelled to do so by court order, subpoena or similar legal procedure, when it is necessary to do so to comply with the law, or where the disclosure of personal information is reasonably necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of the Terms, or as otherwise required by law.
- Third-party service providers who assist us in providing Services to you, including, but not limited to, those who provide card issuance, fraud detection or similar services on our or any vendor's behalf.
- Personnel, agents, advisers, auditors, contractors, financial institutions, and service providers who assist with our business operations (for example, fraud prevention, payment facilitation, or technology services).
- Other third parties with your consent or at your direction to do so;
- Persons to whom we are required to disclose under applicable laws and regulations in or outside of Singapore;
- Actual or proposed transferees of our operations (or a substantial part thereof) in or outside of Singapore;

IV. PURPOSE OF COLLECTION, USE AND DISCLOSURE OF INFORMATION

- We collect, use and disclose your personal information for the following purposes:
 - (i) providing, improving and developing Friz Services;
 - (ii) researching, designing and launching new features or products on our Platform;
 - (iii) presenting content and information in our Website and on our App in the most effective manner for you and for the Device you use;
 - (iv) providing you with alerts, updates, materials or information about our Services or other types of information that you requested or signed up to;
 - (v) complying with applicable laws and regulations;
 - (vi) responding to or taking part in legal proceedings, including seeking professional advice;
 - (vii) for direct marketing purposes;
 - (viii) communicating with you and responding to your questions or requests; and
 - (ix) for purposes arising from or incidental to the above.
- We may use your personal information for direct marketing i.e. offering or advertising products or services by sending the relevant information directly to you by email, in-app message, phone messages or calls. We require your consent specifically for this purpose and you may opt-out any time.
- You acknowledge that we will disclose your personal data to our partners and third-party service providers in the course of providing Services to you, and that your personal information will be used by our partners and third-party service providers for the purposes of providing certain financial services to you, which will require:

- (i) verifying your identity;
- (ii) retrieving data and financial reports from credit bureaus;
- (iii) generating personalized loan offers for you;
- (iv) contacting you to finalize loan terms and arranging for execution of loan documents; and
- (v) any other purpose relating to or incidental thereof, and in such case, you acknowledge that your personal information will be subject to our partners and third-party service provider's respective privacy policies.

V. COOKIES AND ONLINE ADVERTISING

Cookies: Friz uses cookies on the Platform to analyze trends, administer the Website and App, track user movements around the Website and App, and to gather demographic information about our user base as a whole. Cookies help personalize and maximize your use of our Website, including storing user preferences, improving search results, advertisement selection and tracking user trends. You can control your cookies at the browser level, but if you choose to disable cookies, it may limit your use of certain features or functions on our Website or of our Service. We also collect anonymous information through our use of cookies and web beacons. We may collect and store any information you provide us when you use Friz Services, including when you add information on a web form, add or update your account information, participate in community discussions, chats, or dispute resolutions, or when you correspond with us regarding Friz Services.

We use the following types of cookies:

- **Security:** These cookies allow us to secure access to your account. These cookies are required for the operation of our Website and App.
- **Preference:** These are used to recognize you when you return to our Website and App. This enables us to personalize our content for you, greet you by name and remember your preferences.
- **Analytics:** We track traffic patterns so we can identify popular content and potential problems. They allow us to recognize and count the number of visitors and to see how visitors move around our Website and App when they are using it.
- **Features:** These cookies record your visit to our Website and App, the pages you have visited and the links you have followed. We will use this information to make our Website, App and the information displayed on it more relevant to your interests. We also use cookies to split some users into test groups to test new features.
- **Advertising:** We use non-identifiable information about you to show you advertising on Friz and third-party sites.

Some cookies will remain on your computer after you have left our site. Cookies relating to advertisements and Websites and App notices will remain unless you choose to delete them. We also allow other third-party entities to display advertisements to you while you use our Websites and Apps. When this happens, these third-party entities can view, edit or set their own cookies, just as if you had requested a web page from their website. You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you do so, you may not be able to access all or parts of our Site or App.

VI. THIRD-PARTY WEBSITES

Our Platform, Website, App and our communication with you may from time to time contain links to third-party websites, over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. You agree to read the privacy policies and terms of use of these websites and understand your rights therein and adhere to the same. We accept no responsibility or liability for any practices of any third-party websites.

VII. SECURITY

All information provided by you to us is stored on our secure servers. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls, data encryption and information access authorization controls. We make best efforts to ensure that the reasonable security practices adapted by Friz are at par with industry standards. Further:

- We restrict access to personal information to our employees, service providers and contractors on a strictly need-to-know basis and ensure that such persons/entities are subject to contractual confidentiality obligations.
- We review our information collection, storage and processing practices from time to time to guard against unauthorized access, processing or use.
- Please note, however, the transmission of information via the internet is not completely secure. While we make best efforts to protect your personal data, we cannot guarantee the security of your data transmitted on our Platform; and any such transmission is at your own risk.

RETENTION OF DATA

- We will retain your information for as long as it is necessary to provide you with Friz Services on the Platform or till we receive your request for termination of your account on the Platform, whichever is later. Further, we may also be obligated to retain certain information under the applicable laws and/or as part of our contractual obligations with third parties; and accordingly, such information shall be retained as prescribed under applicable laws or as part of our contractual obligations.
- We may retain your information even after you have closed your account on the Platform, if reasonably necessary to comply with our obligations including law enforcement requests, to meet regulatory requirements, resolve disputes, investigate security incidents, prevent fraud and abuse, enforce our User Agreement, or to fulfill your request to “unsubscribe” from further messages from us. We will retain anonymized information after your account has been closed and may continue to use your anonymized data aggregated or in combination with anonymized data of other users.
- We will respond to information access requests within a reasonable timeframe. If we require additional time to provide access to your information, we will acknowledge receipt of your request within a reasonable timeframe and promptly supplement our response within the time period (if any) required by applicable law.

VIII. CONTACT US

If you have any questions, comments or requests regarding personal data, please contact our data protection officer at support@usefriz.com.

IX. GOVERNING LAW

This Privacy Policy is published and shall be governed by and construed in accordance with the applicable laws of Singapore, as amended from time to time.

LAST UPDATED: [June 15, 2021]