

# PRIVACY POLICY

This Privacy Policy describes how DINNGO Pte Ltd ("DINNGO") collects, uses, stores, shares, and protects your information whenever you use DINNGO, a DINNGO mobile app, any DINNGO API or third-party applications relying on such an API, or any other DINNGO services (collectively, the "Services"). By using the Services, you consent to the data practices prescribed in this statement. The term DINNGO as used in this Privacy Policy shall have the same meaning as the term "Company" as used in the Terms and Conditions of Use.

If you use the Services, you consent to the collection, use, storage, and sharing of your information pursuant to this Privacy Policy.

We may periodically post changes to this Privacy Policy on this page, and it is your responsibility to review this Privacy Policy from time to time to ensure you have reviewed the most recent version thereof. When required by law, we will notify you of any changes to this Privacy Policy.

Last updated: August 15, 2018

## A. HOW DINNGO COLLECTS INFORMATION ABOUT YOU

When you use the Services, we collect information sent to us through your computer, mobile phone, or other access devices. This information may include your IP address and device information, including, but not limited to, identifier, device name and type, operating system, location, mobile network information, and standard web log information, such as your browser type, traffic to and from our site, and the pages you accessed on our website.

DINNGO does not direct its websites, mobile app, API, or any of the Services to children. DINNGO does not intentionally collect information from children. If we become aware that we have inadvertently received personal information from a user under the age of 21 (or any lower age pursuant to applicable law), we will delete such information from our records.

If you create an account or use the Services, we, or our affiliates or vendors acting on our behalf, may collect the following types of information:

- Contact information - your name, address, phone number, email address, and other contact information; and
- Financial information - bank account and routing numbers associated with your DINNGO account.

If you seek permission to raise the buy and sell limits associated with your DINNGO account, we may require you to provide additional information which we may use in collaboration with service providers acting on our behalf to verify your identity or address, and/or to manage risk. This information may include your date of birth, taxpayer or government identification number, a copy of your government-issued identification, or other personal information. We may also obtain information about you from third parties such as credit bureaus and identity verification services.

When you use the Services, we collect information about your transactions and/or your other activities on our website and we may continuously collect information about your computer, mobile device, or other access devices for fraud prevention purposes, to monitor for possible breach of your DINNGO account, and to identify any malicious software or other activity that may harm DINNGO or its users.

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (such as Facebook, Google, Twitter and any other Third

Party). The information we have access to varies by site and is controlled by your privacy settings on that site and your authorization thereof. By associating an account managed by a third party with your DINNGO account and authorizing DINNGO to have access to this information, you agree that DINNGO may collect, store, and use this information in accordance with this Privacy Policy.

Finally, we may collect additional information that may be disclosed to our customer success team.

## **B. HOW DINNGO USES COOKIES**

When you use the Services, DINNGO, its affiliates, or companies we work with may place small data files called cookies or pixel tags on your computer or other devices. We use both session and persistent cookies when you access our website or content. Session cookies expire and no longer have any effect when you log out of your account or close your browser. Persistent cookies remain on your browser until you erase them or they expire. We use cookies to:

- recognize you as a DINNGO customer;
- customize DINNGO Services, content, and advertising;
- measure promotional effectiveness; and
- collect information about your computer or other access devices to mitigate risk, help prevent fraud, and promote trust and safety.

We also use Local Shared Objects, commonly referred to as "Flash cookies," to help ensure that your account security is not compromised, to spot irregularities in behavior to help prevent fraud, and to support our sites and services.

We encode our cookies so that only we can interpret the information stored in them. You are free to decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of the Services. The help section of most browsers or browser add-ons provides instructions on blocking, deleting, or disabling cookies.

You may encounter DINNGO cookies or pixel tags on websites that we do not control. For example, if you view a web page created by a third party or use an application developed by a third party, there may be a cookie or pixel tag placed by the web page or application. Likewise, these third parties may place cookies or pixel tags that are not subject to our control and the DINNGO Privacy Policy does not cover their use.

If you would prefer not to accept cookies, most browsers will allow you to: (i) change your browser settings to notify you when you receive a cookie, which lets you choose whether or not to accept it; (ii) disable existing cookies; or (iii) set your browser to automatically reject cookies. Please note that doing so may negatively impact your experience using the Service, as some features and services on our Service may not work properly. Depending on your mobile device and operating system, you may not be able to delete or block all cookies. You may also set your e-mail options to prevent the automatic downloading of images that may contain technologies that would allow us to know whether you have accessed our e-mail and performed certain functions with it.

## **C. HOW DINNGO PROTECTS AND STORES PERSONAL INFORMATION**

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. This Privacy Policy does not apply to personal information that has been anonymized so that it does not and cannot be used to identify a specific user. DINNGO takes reasonable

precautions, as described herein, to protect your personal information from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

We store and process your personal and transactional information, including certain payment information, where DINNGO facilities or our service providers are located, and we protect it by maintaining physical, electronic, and procedural safeguards in compliance with applicable laws. We employ safeguards such as firewalls and data encryption, physical access controls to our buildings and files, and restricted access to personal information only for those employees who require it to fulfill their job responsibilities.

We store our customers' personal information securely throughout the life of the customer's DINNGO account. DINNGO will retain your personal information for a minimum of ten years or as necessary to comply with our legal obligations or to resolve disputes.

#### **D. HOW DINNGO USES THE PERSONAL INFORMATION WE COLLECT**

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- provide the Services and requested customer support;
- process transactions and send notices about your transactions;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted user terms;
- customize, measure, and improve DINNGO Services and the content and layout of our website and applications;
- deliver targeted marketing, service update notices, and promotional offers based on your communication preferences; and
- verify your identity by comparing your personal information against third-party databases.

We will not use your personal information for purposes other than those purposes we have disclosed to you, without your permission. From time to time we may request your permission to allow us to share your personal information with third parties. You may opt out of having your personal information shared with third parties, or from allowing us to use your personal information for any purpose that is incompatible with the purposes for which we originally collected it or subsequently obtained your authorization. If you choose to so limit the use of your personal information, certain features of the Services may not be available to you.

We will never sell or rent your personal information to third parties.

Any communications we send to you will either be related to your account or will be related to DINNGO services or products. In the event DINNGO sends any communication to you which is not related specifically to your account, DINNGO will provide you with an "unsubscribe" mechanism through which you may opt out of receiving other similar messages in the future.

#### **E. HOW PERSONAL INFORMATION IS SHARED**

If you use your DINNGO account to transfer digital currency in connection with the purchase or sale of goods or services, we or you may also provide the seller with your

shipping address, name, and/or email to help complete your transaction with the seller. The seller is not allowed to use this information to market their services to you unless you have given prior consent. If an attempt to transfer digital currency to your seller fails or is later invalidated, we may also provide your seller with details of the unsuccessful transfer. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

In connection with a digital currency transfer between you and a third party, including merchants, a third party may share information about you with us, such as your email address or mobile phone number which may be used to inform you that a transfer has been sent to or received from the third party. We may use this information in connection with such transfers to confirm that you are a DINNGO customer, that digital currency transfers are enabled, and/or to notify you that you have received digital currency. If you request that we validate your status as a DINNGO customer with a third party, we will do so. You may also choose to send digital currency to or request digital currency from an email address. In such cases, your username will be displayed in an email message notifying the user of the designated email address of your action. Please note that merchants you interact with may have their own privacy policies, and DINNGO is not responsible for their operations, including, but not limited to, their information practices.

If you authorize one or more third-party applications to access your DINNGO account, then the information you have provided to DINNGO may be shared with those third parties. Unless you provide further authorization, these third parties are not allowed to use this information for any purpose other than to facilitate your transactions made during your use of the Services.

We may also share information with others in an aggregated or otherwise anonymized form that does not reasonably identify you directly as an individual.

## **F. HOW DINNGO SHARES PERSONAL INFORMATION WITH OTHER PARTIES**

We may share your personal information with the following parties for the following reasons.

**Third-party identity verification services.** This allows DINNGO to confirm your identity by comparing the information you provide us to public records and other third-party databases. These service providers may create derivative data based on your personal information that can be used solely in connection with provision of identity verification and fraud prevention services.

**Various service providers.** These service providers are those under contract to help with parts of our business operations, such as bill collection, marketing, and technology services. Our contracts require these service providers to only use your information in connection with the services they perform for us, and prohibit them from selling your information to anyone else;

**Partner Financial Institutions.** These institutions are those with a bank account and routing numbers associated with your DINNGO account.

**Prospective M&A Partners.** Our business plans may entail discussions with companies or other entities that we plan to merge with or be acquired by, or companies intending to acquire certain portions of our business. Should such a merger or acquisition occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.

**Law enforcement, government officials, or other third parties.** We may be required to disclose personal information if and when compelled to do so by a subpoena, court order, or similar legal procedure.

**Miscellaneous.** We may also make disclosures of personal information if we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our terms and conditions of use.

Before DINNGO shares your information with any third party, DINNGO will, to the extent permitted by applicable laws, rules, or regulations, enter into a written agreement requiring that the third party to provide at least the same level of privacy protection as required hereunder.

If you establish a DINNGO account indirectly on a third-party website or via a third-party application, any information that you enter on that website or application (and not directly on a DINNGO website) will be shared with the owner of the third-party website or application and your information may be subject to their privacy policies.

In general, we will notify you of material changes to this policy by updating the last updated date at the top of this page, and we will provide you with explicit notice of material changes as required by law. We recommend that you visit this page frequently to check for changes.

#### **G. SPECIFIC CONSENT BY USERS IN SINGAPORE**

If you are located in, or a resident of, Singapore, you specifically and voluntarily consent to the transfer of your personal information to our related entity and service providers in USA and/or the UK, for the specific purposes of performing identity verification or checking, to enable us to prevent fraud and comply with our legal obligations.

The USA and/or the UK may not have protections in place for personal data as extensive as those within Singapore. However, we require our service providers to treat your personal information in strict confidence and use appropriate security measures to protect it. We also require them to uphold all of our other obligations under this Privacy Policy.

You may revoke your consent to this section at any time by emailing [support@dinningo.co](mailto:support@dinningo.co) with the subject line "Revoke Singapore data consent".

#### **H. RIGHT TO ERASURE OF PERSONAL INFORMATION**

You are entitled to the right to obtain the erasure of your personal data without undue delay in certain circumstances, such as where the personal data is no longer necessary in relation to the purposes for which it was collected or processed.

Should you wish to obtain the erasure of your personal data, please email [support@dinningo.co](mailto:support@dinningo.co) with the subject line "Erasure of Personal Information".

#### **I. YOUR CONTROL OVER INFORMATION**

You may opt out of any future contacts from us at any time. You can do so at any time by contacting us at [support@dinningo.co](mailto:support@dinningo.co).

#### **J. HOW YOU CAN CONTACT US ABOUT PRIVACY QUESTIONS**

If you have questions or concerns regarding this policy, or if you have a complaint, you should first contact us on our support page, by emailing [support@dinningo.co](mailto:support@dinningo.co).