

**MOBISTREAM**

**WIFIN PRIVACY POLICY**



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## Wifin values your privacy

Wifin values its relationship with you and respects your right to privacy. Wifin's Privacy Policy ("Privacy Policy") covers its treatment of information that you provide to us or that we collect from you when you are visiting the Website and when you use our products and services.

### 1.0 Agreement

By using the Services and/or accessing our Website, you are acknowledging that you have read and understood this Privacy Policy and agree to be legally bound by it. In addition, when you register as a user of any of the features of our Website (a "Subscriber"), during the registration process (and from time to time as Wifin may require) you will be prompted to click an "I Accept," "Submit" or similar button, which further confirms your agreement to be legally bound by this Privacy Policy.

### 2.0 Scope of Policy

This Privacy Policy applies only to information you provide to us online or that we collect from you while visiting or using our Website. It does not apply to information we have obtained offline or through other means.

### 3.0 What Information We Collect and Use

Wifin reserves the right to use and control the information collected on the Website. We will not share this information with any third party, other than as disclosed in this Privacy Policy. We collect information from users at different points on our Website and through our software, as follows:

3.1. Registration: In order to subscribe to Wifin's products and services, we require that you complete a Subscription Form. This form may ask for contact information, such as name, address, email address, telephone number, company name, fax number and other basic contact information ("Registration Information"). After submitting your Registration Information, you can view and modify this information within the self-maintenance area of the Website. You agree to notify Wifin of any change to your billing address within twenty one (21) days of such change. Wifin will record the date and time that your Registration Information is created or modified by you.

3.2. Subscription: When you subscribe to an Wifin's products and/ or services, we request the appropriate billing information on our order form. This information includes your GIRO details or credit card number, expiration date

and billing address ("Subscription Information"). Subscription Information is kept with your Registration Information in a database and will be retained for future purchases.

**3.3. Wifin's Mobistream Software:** While accessing and operating Mobistream, the software may record general statistical and tracking information, such as the date and time a client accesses his or her product, the time spent using it and the bandwidth consumed. The software transfers this information to Wifin's servers, and such information is used exclusively for internal resource management purposes and to make the service more valuable for Wifin's customers.

**3.4. Other:** Wifin may automatically receive and record information in our server logs from your browser, including your IP address, your device's make, the type and version of your web browser, referrer addresses and other generally-accepted log information. We may also record page or screen views and other general statistical and tracking information, which will be aggregated with that of other users in order to understand how our Service is being used.

**3.5. Partners:** Wifin may enter into agreements with other companies that provide content or develop and market software or services that either function similarly to Wifin's software or that enhance or extend our software's functionality. Some of these may be third party products that may utilize components of Wifin's software. Under the terms of these agreements, we may be required to collect information about your sessions and your use of these third party products and share this information with these third parties.

**3.6. Service Provider:** A Service Provider is an entity that agrees to pay for the Mobistream or other information services provided to you. We may enter into contractual agreements with these providers governing the provider arrangement. Under the terms of these agreements, we may be required to collect information about your sessions and your usage pattern of our product or service and share this information, along with your personally identifiable information, with the provider paying for your service. This information will be kept strictly confidential, and will not be not shared with other third parties, except as provided for in this Privacy Policy.

**3.7. Device Configuration:** In order to determine whether your device is supported by our system, we may collect certain anonymous information. This information includes, but may not be limited to, your operating system, firmware and browser, as well as the presence of Wifin's software or other

third party software on your device. This information is kept strictly confidential and is not shared with third parties, except as provided in this Privacy Policy.

#### **4.0 Usage of information collected**

In general, except as provided in this policy, we will not disclose your personally identifiable information to unaffiliated third parties without your express consent. There are, however, some limited circumstances in which we may need to disclose personally identifiable information about a user without express consent, including, but not limited to, the circumstances set forth below:

4.1. Our Vendors: We may employ other companies to perform functions on our behalf, such as fulfilling orders, providing customer service, sending print and electronic mail, processing GIRO/ credit card payments, or other functions necessary to our business. In order to allow these companies to perform their obligations, we may need to share your personally identifiable information with them. However, we will provide these companies with only that information necessary to perform their functions on our behalf, and we will not allow them to use your personally identifiable information for any other purpose.

4.2. Distributors/ Resellers: Wifin may, from time to time enter into agreements with companies that distribute/ resell our products or services, either on our behalf, or on their own behalf on a private labeled basis and/or on a co-branded basis. Under the terms of these agreements, we may be required, and therefore we reserve the right, to share your personally identifiable information with such Distributors/ Resellers. Once your personally identifiable information is provided to such Distributors/ Resellers, it will no longer be covered by this privacy policy. In those instances, your personally identifiable information will be governed by the privacy policy of the Distributors/ Resellers to whom it is provided. Notwithstanding the foregoing, Wifin will not share your Registration and/ or Subscription Information with any reseller that is not billing you directly for the re-marketed, private labeled and/or co-branded Wifin's products/ services to which you subscribe.

4.3. Wifin Publishers and Merchants: Wifin reserves the right to provide to publishers and other merchants for whom Wifin sells or distributes products or services any personally identifiable information as is necessary to fulfill any requests you may make for their products or services. In addition, merchants of the products you purchase or to which you subscribe through Wifin may request additional personally identifiable information from you. Wifin will

provide the merchants of such products the information you supply in response to those requests and, following such disclosure by Wifin, your personally identifiable information will no longer be covered by this policy. In those instances, your personally identifiable information is governed by the privacy policy of the merchants whose products you have purchased or to which you have subscribed.

4.4. Imminent Harm: We may reveal your personally identifiable information to attorneys, private investigator organizations or law enforcement agencies if we believe that you are harming or interfering (or will imminently harm or interfere) with other Wifin subscribers or anyone else or violating (either intentionally or unintentionally) our Terms and Conditions of Use or infringing any of Wifin's legal rights.

4.5. Legal: Wifin will reveal your personally identifiable information, to the extent we reasonably believe we are required to do so by law. If we receive legal process calling for the disclosure of any of your personally identifiable information we will attempt to notify you via the email address you supplied during registration within a reasonable amount of time before we respond to the request, unless such notification is not permitted.

4.6. Transfer of Assets/ Change of Ownership: Wifin shall be entitled to transfer to a third party information it collects, including any personally identifiable information, in connection with a sale of all or substantially all of its assets or during the change of ownership of the company.

## **5.0 Changing or Removing Personal Information; Opting Out**

To ensure that you have appropriate control over your personally identifiable information, you can access your account (after supplying your user name and password) in the Self-Maintenance area of our Website to update and/or correct the information you have previously submitted.

In addition, we provide you with the ability to decline -- or "opt-out of" -- certain mailings and other materials we may offer.

Finally, if you request, we will remove your name and other personally identifiable information from our databases. Please understand, however, that it may be impossible to remove this information completely, due to backups and records of deletions. If you wish to remove your name and other personally identifiable information from our database, please create an email with the term "Unsubscribe" in the subject line, and send the email to the address listed in Section 12.0 of this Privacy Policy. As an alternative, you may

write to us with your request, at the mailing address set forth in Section 10.0. You will be removed from our databases generally within ten business days of our receipt of your request.

## **6.0 Communications to our Users**

6.1. Wifin : Wifin sends emails and/or postal mailings to new subscribers and to provide to existing subscribers information regarding our specific products/ services. Periodically, Wifin will send news and information to subscribers and other parties who have expressed interest in Wifin and its products/ services. These communications are an information service to users who have indicated a preference to receive promotions relating to our products and services, and to receive special offers relating to third-party products, sites and services. You can opt out of receiving these promotional communications through the Self-Maintenance area of our Website. For so long as you use Wifin'sl products and services or otherwise maintain a business relationship with Wifin, however, you may not opt out of receiving communications from Wifin relating specifically to those products and services or business relationship.

6.2. Third Parties: Except as described in this Privacy Policy, we do not share personally identifiable information with anyone, unless we have informed you of a change to our Privacy Policy and given you the opportunity to then choose to opt out. Once you have indicated that your information may be shared with third parties or you have responded to an offer by any third party on the Website, Wifin can no longer update any of your personally identifiable information that has been transferred to such third parties or opt you out of such third parties so that you no longer receive their promotional and/or marketing information. Instead, you must either contact that third party or refer to its privacy policy to update your personally identifiable information or to let the third party know that you no longer want to receive promotional and/or marketing information about its products, services or offerings.

## **7.0 Security of Personally Identifiable Information**

Wifin maintains controls to protect the financial information you provide us, including GIRO and credit card details, during the product/ service purchase process.

Wifin employees are required to acknowledge that they understand and will strictly abide by our corporate policies with respect to the confidentiality of personally identifiable information. Moreover, Wifin only gives access to databases containing personally identifiable information to employees on a

need-to-know basis. Our security procedures are reviewed on a periodic basis to ensure that they remain current. Accordingly, we have put in place security systems designed to prevent unauthorized disclosure of information you provide to us. These systems are structured to deter and prevent hackers and others from accessing this information. Due to the nature of Internet communications and evolving technologies, however, we cannot provide, and disclaim, assurance that the information you provide us will remain free from loss, misuse, or alteration by third parties who, despite our best efforts, obtain unauthorized access.

### **8.0 Notification of Changes**

Wifin reserves the right to change or modify this Privacy Policy from time to time, or to terminate this Privacy Policy. We will post notice of the new policy from the Privacy Policy link on the homepage of our Website. Your use of our Website following any such change constitutes your agreement to follow and be bound by the Privacy Policy, as changed. If we make any significant changes regarding disclosure of personally identifiable information to third parties, we will attempt to notify you prior to the date the modified policy takes effect.

### **9.0 Your Consent**

By using our Website, you consent to our collection and use of your information, in accordance with this Privacy Policy. If you do not agree with some, or all of the terms of this Privacy Policy, you may not become a Subscriber, or otherwise visit our Website.

### **10.0 Contact Us**

You may contact us for any reason by email or traditional mail at the following addresses, provided, however, if you wish to provide us with formal notice under our Privacy Policy, you must provide your notice in writing, and mail it to the address set forth below:

By mail:

Wifin Technologies Pte Limited  
5, Shenton Way, UIC Building #27-01  
Singapore 068808

By email: [support@wifintech.com](mailto:support@wifintech.com)