

# Privacy Policy

Effective Date: **2 June 2024**

This Privacy Policy and its Addendum(s) ("**Privacy Policy**") describe how CheetahGo company collect, use, process and disclose your Personal Data through the use of CheetahGo's mobile applications and websites (respectively "**Apps**" and "**Websites**"), as well as products, features and other services globally, operated by CheetahGo (collectively, "**Services**").

This Policy applies to our consumers, agents, vendors, suppliers, partners (such as driver, delivery and merchant partners), contractors and service providers (collectively "**you**", "**your**" or "**yours**").

"**Personal Data**" is any information which can be used to identify you or from which you are identifiable. This includes but is not limited to your name, nationality, telephone number, bank and credit card details, personal interests, email address, your image, government-issued identification numbers, biometric data, date of birth, vehicle and insurance information, employment information and financial information.

We typically collect, use, disclose or otherwise process your Personal Data in accordance with this Privacy Policy with your consent, or in compliance with applicable laws, such as where:

- it is required for us to comply with legal requirements;
- it is required for us to enter into or perform a contract with you; and/or
- for our legitimate interests or the legitimate interests of any other persons, including but not limited to for the purposes set forth in this Privacy Policy.

## I. COLLECTION OF PERSONAL DATA

We collect Personal Data about you in the ways listed below. We may also combine Personal Data collected via these various channels:

### You provide your Personal Data to us

We collect your Personal Data when you provide it to us. For example, when you:

- complete a user profile or registration forms (such as your name, contact information and other identification information where needed);
- provide information to assess your eligibility to provide services as a CheetahGo driver partner or delivery partner (such as your driver's license information, vehicle information and background check results);
- interact with our social media pages (such as your social media account ID, profile photo and any other publicly available data);

- verify your identity through various means (such as social media logins, submission of selfie images or independently verified payment card information);
- agree to take a ride with in-vehicle audio and/or video recording features.

## When our services are used

Personal Data may be collected through the normal operation or use of our Apps, Websites and Services. Some examples are:

- your location information;
- feedback, ratings and compliments;
- transaction information (such as payment method);
- information about how you interacted with our Apps, Website or Services (such as features used and content viewed);
- device information (such as hardware model and serial number, IP addresses), file and app names and versions, GPS location, IMEI number, and advertising identifiers or any information that may indicate device or app modification);
- telematics data (such as your speed, acceleration and braking data);
- personal data you enter in messages when you use our in-app communication features; and
- personal data that may be captured through your interaction with us, our agents, in-vehicle audio and/or video recording during a ride (such as your image or voice or both, and its related metadata).
  - our in-vehicle applications or devices
    - we may install in-vehicle audio and/or video recording applications or devices to promote the safety and security of our driver partners, delivery partners and consumers.
    - your Personal Data may be captured in these audio and/or video recordings. Where in-vehicle audio and/or video recordings are made, such recordings are collected, processed, used and stored in a manner in accordance with this Privacy Policy and applicable laws.
  - personal in-vehicle applications or devices
    - some CheetahGo partners may install personal in-vehicle applications or devices in their vehicles for their own purposes. This practice is not endorsed nor prohibited by CheetahGo;
    - the collection, use and disclosure of Personal Data obtained from personal in-vehicle applications or devices is the responsibility of the relevant partner. Please check with the relevant partner if you have any queries about their use of personal in-vehicle cameras.

## From other sources

We may collect Personal Data, including but not limited to your name, contact information and other identification information where needed from other sources. Such sources include:

- referral programmes;

- our business partners, such as fleet partners, payment providers, ride-hailing partners and transport partners;
- insurance and financial providers;
- credit bureaus, alternative credit scoring agencies and any other credit reporting organisations;
- publicly available or governmental sources of data;
- when our users add you as an emergency contact;
- when our users add you as a recipient or beneficiary of any use of our Services;
- when you use our in-app chat; and
- marketing services providers or partners.

## Sensitive Personal Data

Some of the Personal Data that we collect may be sensitive in nature. This may include Personal Data pertaining to your race, national ID information, religious beliefs, background information (including financial and criminal records, where legally permissible), health data, disability, marital status and biometric data, as applicable. We collect sensitive Personal Data only with your consent and/or in strict compliance with applicable laws. In the event that you are required to furnish any documentation or information to us for any Purpose which may contain such sensitive Personal Data (which is not required that Purpose), you agree to redact such sensitive Personal Data before providing such documentation or information to us.

## When you provide Personal Data of other individuals to us

In some situations, you may provide Personal Data of other individuals (such as your spouse, family members or friends) to us. For example, you may add them as your emergency contact, when you use the in-app chat or when you add them as recipients or beneficiaries of any use of our Services. If you provide us with their Personal Data, you represent and warrant that you have obtained their consent for their Personal Data to be collected, used and disclosed as set out in this Privacy Policy.

## Personal Data of minors

As a parent or legal guardian, please do not allow minors under your care to submit Personal Data to CheetahGo. In the event that such Personal Data of a minor is disclosed to CheetahGo, you hereby consent to the processing of the minor's Personal Data and accept and agree to be bound by this Policy and take responsibility for his or her actions.

## II. USE OF PERSONAL DATA

CheetahGo may use your Personal Data for the following purposes set out in the list below. ("**Purposes**"). Additionally, if you use CheetahGo in various capacities (for example, if you use

multiple CheetahGo Services, or if you are both a driver partner/delivery partner and a consumer), we may link your Personal Data collected across your various capacities to facilitate your use of our Services and for the Purposes described below:

## Providing services and features

Your Personal Data will be used to provide, personalise, maintain and improve our Apps, Websites and Services. This includes using your Personal Data to:

- engage you to provide you with Services across our various business verticals;
- create, administer and update your account;
- process, manage or verify your eligibility for or application of products, Services, promotions, rewards and subscriptions with CheetahGo;
- conduct due diligence checks and risk assessments / analysis;
- verify your identity and age (where necessary);
- validate your ride and process payments;
- offer, obtain, provide, facilitate or maintain insurance or financing solutions;
- track the progress of your trip and detect abnormal trip variations;
- allow you to participate in the loyalty programmes or marketing activities organized by our merchant-partners and/or in collaboration with CheetahGo;
- personalise your App experience (such as to recommend products and services relevant to you, identify your preferences or otherwise personalise your experience with CheetahGo);
- perform internal operations necessary to provide our Services, including troubleshooting software bugs and operational problems, conducting data analysis, testing and research, monitoring and analysing usage and activity trends;
- protect the security or integrity of the Services and any facilities or equipment used to make the Services available;
- enable communications between our users;
- invite you to participate in our surveys and studies;
- enable our partners to manage and allocate fleet resources; and
- fulfil the services to you as a data processor, where you have provided consent to the data controller (i.e. the organisation you had purchased goods or services from, and for whom CheetahGo is providing services on behalf of) for such services to be rendered.

## Safety and security

We use your data to ensure the safety and security of our Services and all users. This includes:

- screening driver and delivery partners before enabling their use of our Services;
- identifying unsafe driving behaviour such as speeding, harsh braking and acceleration, and providing personalised feedback to driver partners;
- verifying your identity when you log in to CheetahGo;
- using device, location, profile, usage and other Personal Data to prevent, detect and combat fraud or unsafe activities;
- monitoring compliance with our terms and conditions and policies.

## User support

We use Personal Data to resolve user support issues. For example, we may:

- investigate and address concerns;
- monitor and improve our user support responses;
- respond to questions, comments and feedback; and
- inform you about steps taken to resolve user support issues.

## Research and development and security

We may use the Personal Data we collect for testing, research, analysis and product development. This allows us to understand and analyse your needs and preferences, protect your Personal Data, improve and enhance the safety and security of our Services, develop new features, products and services.

## Legal purposes

We may use the Personal Data we collect for legal purposes, such as to investigate and resolve claims or disputes, detect/prevent/prosecute crime, or as allowed or required by applicable law.

We may also use your Personal Data when we are required, advised, recommended, expected or requested to do so by our legal advisors or any local or foreign legal, regulatory, governmental or other authority.

For example, we may use your Personal Data to:

- comply with court orders or other legal, governmental or regulatory requirements;
- enforce our Terms of Service or other agreements; and
- protect our rights or property in the event of a claim or dispute.

## Marketing and promotions

We may use your Personal Data to send you marketing communications relating to customised products or services (that may be of interest or relevance based on your profile), or CheetahGo's partners', sponsors' and advertisers' products, services, events or promotions. For example, we may:

- send you special offers that may be of interest or relevance to you across all of CheetahGo's service offerings;
- send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings; and
- notify, invite and manage your participation in our events or activities.

We may communicate such marketing to you by various means, where applicable (including by SMS, chat applications (e.g. WhatsApp, Telegram), push notification, call, and by email).

If you wish to unsubscribe to the receiving of such marketing communications, please click on the unsubscribe link in the relevant email or message. Alternatively, you may also update your preferences in our App settings. Please note that while you may opt out of marketing or promotion communications, CheetahGo may still send you account and / or service-related messages (such as two-factor authentication, information on your transactions, rewards, etc.).

## User Published Content

If you publish content (such as a review or comment) on CheetahGo's platform, it will be shown publicly along with your personal data (such as profile name, uploaded photo(s)), and other information you choose to include in your content.

## III. DISCLOSURE OF PERSONAL DATA

We need to share Personal Data with various parties for the Purposes. These parties include:

### Other users

For example:

- if you are a passenger of driver partners, we may share your username, pick-up and drop-off locations with our driver partner fulfilling your service request;
- if you are a driver partner, we may share your Personal Data with your passenger including your name and photo; your vehicle make, model, number plate, location and average rating;
- if you are participating in loyalty programmes or marketing activities organized by our merchant-partners, we may share your Personal Data with them, including your name and contact details;
- if you are a delivery partner, we may share your Personal Data with your selected merchant-partner and user, including your name and photo; your vehicle make, model, location and average rating;
- if you use our in-app chat service, we may share your mobile number and CheetahGo-registered name with the other parties to your chat.

### With third parties

#### With third parties related to your use of CheetahGo Services

For example:

- if you are a driver-partner, we may disclose your vehicle plate number or other personal data to the insurance company and/or to your customer for the purpose of submission of insurance claims.
- if you use our payment services, we may share your Personal Data with another individual should you authorise and enable connection of his or her third party service payment method to our payment service for the purposes of enabling your payment on CheetahGo.

## With CheetahGo's service providers and business partners

We may provide Personal Data to our vendors, consultants, marketing partners, research firms, and other service providers or business partners. This includes:

- payment processors and facilitators;
- debt collectors;
- credit bureaus, alternative credit scoring agencies and any other credit reporting organisations;
- background check and anti-money laundering service providers;
- cloud storage providers;
- document storage and management providers;
- advertising and marketing partners and platform providers;
- data analytics providers;
- insurance and financing partners;
- third party intermediaries involved in the managed investment of funds, such as brokers, asset managers, and custodians;
- service providers who perform identity verification services; and
- vehicle solutions partners, vendors or third-party vehicle suppliers.

For example:

- If you requested a service through a CheetahGo partner or used a promotion provided by a CheetahGo partner, CheetahGo may share your Personal Data with that CheetahGo partner.
- If you have rented a vehicle from our recommended fleet partners to drive with CheetahGo, we may share relevant information (e.g. the status of your account, applicable incentives/promotions, your ride statistics) for collaborative efforts (e.g. create new incentives and benefits for you or improving supply of driver partners).

## With our legal advisors and governmental authorities

We may share your Personal Data with our legal advisors, law enforcement officials, government authorities and other third parties. This may take place to fulfil the legal purposes (mentioned above), or any of the following circumstances:

- where it is necessary to respond to an emergency that threatens the life, health or safety of a person; or
- where it is necessary in the public interest (e.g. in a public health crisis, for contact tracing purposes and safeguarding our community).

## Business transfers

We may share your Personal Data with other parties, in connection with any acquisitions, sales, mergers, joint ventures, consolidation, restructuring, financing or any other type of business transactions. Your Personal Data will however remain subject to our obligations made in any pre-existing Privacy Policy that you have agreed to.

## IV. RETENTION OF PERSONAL DATA

We retain your Personal Data for the period necessary to fulfill the Purposes outlined in this Policy unless a longer retention period is required or allowed by law. Once your Personal Data is no longer necessary for the Services or Purposes, or we no longer have a legal or business purpose for retaining your Personal Data, we take steps to erase, destroy, anonymise or prevent access or use of such Personal Data for any purpose other than compliance with this Policy, or for purposes of safety, security, fraud prevention and detection, in accordance with the requirements of applicable laws.

## V. INTERNATIONAL TRANSFERS OF PERSONAL DATA

Your Personal Data may be transferred from the country, state and city ("**Home Country**") in which you are present while using our Services to another country, state and city ("**Alternate Country**").

When we transfer your Personal Data from your Home Country to the Alternate Country, we will comply with our legal and regulatory obligations in relation to your Personal Data, including having a lawful basis for transferring Personal Data and putting appropriate safeguards in place to ensure an adequate level of protection for the Personal Data. We will also ensure that the recipient in Alternate Country is obliged to protect your Personal Data at a standard of protection comparable to the protection under applicable laws.

Our lawful basis will be either consent (i.e. we may ask for your consent to transfer your Personal Data from your Home Country to the Alternate Country at the time you provide your Personal Data) or one of the safeguards permissible by laws.

## VI. COOKIES, RELATED TECHNOLOGIES AND ADVERTISING ON THIRD PARTY PLATFORMS

### Cookies

CheetahGo, and third parties with whom we partner, may use cookies, web beacons, tags, scripts, local shared objects such as HTML5, advertising identifiers and similar technologies (such



as software development kits (SDKs), which have similar functions to cookies and which may be installed in the CheetahGo App to allow partners to collect certain information about your interaction with the CheetahGo App) (collectively, “**Cookies**”) in connection with your use of the Websites and Apps, which may be persistent or stored only during an individual session on your browsers or devices.

Cookies may have unique identifiers, and reside, among other places, on your computer or mobile device, in emails we send to you, and on our web pages. Cookies may be used for various purposes such as to:

- provide the essential, basic functions of the use of our Websites, Services or Apps;
- authenticate you, or remember your user preferences and settings;
- delivering and measuring the effectiveness of advertising campaigns, such as by measuring number of views or clickthroughs;
- analyse site traffic and trends;
- serve you relevant advertisements across other apps and websites owned by other companies (whether by us or by other advertisers); and
- enhance user interface and experience by generally understanding the online behaviors and interests of users who interact with our Website, Services or Apps.

CheetahGo may allow third parties to use Cookies on the Websites and Apps to collect the same type of Personal Data for the same purposes CheetahGo does for itself. Third parties may be able to associate the Personal Data they collect with other Personal Data they have about you from other sources. We do not necessarily have access to or control over the Cookies they use.

## Disabling the collection of cookies on our websites

You have the right to choose to disable, block or deactivate cookies. Please note that however refusal or removal of some cookies could affect the availability, functionality or use of our Website, Services or Apps.

You may adjust your internet browser settings to disable, block or deactivate cookies, delete your browsing history or clear the cache from your internet browser. The settings may be contained within the “History”, “Preferences”, “Settings” or “Privacy” section of your internet browsers, or you may otherwise consult the help section of your internet browser for more information.

## VII. PROTECTION OF PERSONAL DATA

We will take reasonable legal, organisational and technical measures to ensure that your Personal Data is protected. This includes measures to prevent Personal Data from getting lost, or used or accessed in an unauthorised way. We limit access to your Personal Data to our employees on a need to know basis. Those processing your Personal Data will only do so in an authorised manner and are required to treat your information with confidentiality.

Nevertheless, please understand that the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot

guarantee the security of your Personal Data transmitted through any online means, therefore, any transmission remains at your own risk.

## VIII. YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA

In accordance with applicable laws and regulations, you may be entitled to:

- inquire about the processing of your Personal Data and be provided with a copy of it;
- in some cases, request the correction and/or deletion of your Personal Data;
- in some cases, request the restriction of or object to the processing of your Personal Data;
- withdraw your consent to the processing of your Personal Data within our possession or control (and where we are processing your Personal Data based on your consent);
- request receipt or transmission to another organisation, in a machine-readable form, of the Personal Data that you have provided to us where we are using your Personal Data based on consent or performance of a contract; and
- complain to the relevant data privacy authority if your data privacy rights are violated, or if you have suffered detriment as a result of unlawful processing of your Personal Data.

Where you are given the option to share your Personal Data with us, you can always choose not to do so. If we have requested your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, choosing not to share your Personal Data with us, withdrawing your consent to our use of it or to your agreement with our Privacy Policy could mean that we are unable to perform the actions necessary to achieve the purposes of processing described in *Section II (Use of Personal Data)* or that you are unable to make use of App or the Services.

After you have chosen to withdraw your consent, we may be able to continue to process your Personal Data to the extent required or otherwise permitted by applicable laws and regulations.

We will screen and verify all requests beforehand. In order to verify your authority to make the request, we may require you to provide supporting information or documentation to corroborate the request. Once verified, we will give effect to your request within the timelines prescribed by applicable laws.

## IX. AMENDMENTS AND UPDATES

CheetahGo may modify, update or amend the terms in this Privacy Policy at any time. Such amendments shall be notified to you through the Application and/ or other appropriate means at least five (5) business days before the effective date. The updated version will be posted on the website <https://cheetahgo.app>. It is your responsibility to review the Privacy Policy regularly. Your continued use of the Apps, Websites or Services, purchase products from CheetahGo or continuing to communicate or engage with CheetahGo following the modifications, updates or amendments to this Policy, whether or not reviewed by you, shall constitute your agreement to be bound by such amendments.

## **X. HOW TO CONTACT US**

If you have any questions or suggestions regarding our privacy policy, please contact us at [cheetahgo.app@gmail.com](mailto:cheetahgo.app@gmail.com)

The original of this Policy is written in the English language. In the event of any conflict between the English and other language versions, the English version shall prevail.