

Privacy Policy (Last updated: 6 February 2020)

At Ottodot, we recognize that privacy and intellectual property rights are important to our users. This Privacy Policy applies to all products, services and websites offered by Ottodot Pte Ltd or its affiliated companies, such as www.platform.ottodot.com, www.tools.ottodot.com and any associated services and products (collectively, the "Service").

Ottodot processes personal information only for the purposes described in this Privacy Policy including:

- Providing our services, including the display of customized content and advertising, and the recommendation of resources to our users;
- Auditing, research and analysis in order to maintain, protect and improve our services;
- Ensuring the technical functionality of our network;
- Protecting the rights or property of Ottodot or our users; and
- Developing new services.

Ottodot processes personal information on our servers in The Republic of Singapore and in other countries. In some cases, we process personal information on a server which may be outside your own country. We may process personal information to provide our own services. In some cases, we may process personal information on behalf of and according to the instructions of a third party, such as our advertising partners.

Option to opt out

When you sign up for our service, you will be asked to provide personal information. If we use this information in a manner other than the purpose for which it was collected, then we will ask for your consent prior to such use.

If we propose to use personal information for any purposes other than those described in this Privacy Policy and/or in the specific service privacy notices, we will offer you an effective way to opt out of the use of your personal information for those other purposes. We will not collect or use sensitive information for purposes other than those described in this Privacy Policy, unless we have obtained your prior consent.

For individual purchases through direct online payment, Ottodot processes personal information only for payment and account creation purposes. The customer will only be contacted by us to inform you of anything involving your payment.

By default, provided information such as the user's name, class, school, and country etc might be seen by other logged-in users under certain modules. The user may choose to opt out by contacting us at info@ottodot.com.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. However, some Ottodot Product features may not function properly if your cookies are disabled.

You can decline to submit personal information to any of our services, in which case Ottodot may not be able to provide those services to you.

Information sharing

Ottodot only shares personal information with other companies or individuals outside of Ottodot in the following limited circumstances:

- We have your consent. We require opt-in consent for the sharing of any sensitive personal information.
- We provide such information to our subsidiaries, affiliated companies or other trusted businesses or persons for the purpose of processing personal information on our behalf. We require that these parties agree to process such information based on our instructions and in compliance with this Privacy Policy and any other appropriate confidentiality and security measures.
- We have a good faith belief that access, use, preservation or disclosure of such information is reasonably necessary to (a) satisfy any applicable law, regulation, legal process or enforceable governmental request, (b) enforce applicable Terms of Service, including investigation of potential violations thereof, (c) detect, prevent, or otherwise address fraud, security or technical issues, or (d) protect against harm to the rights, property or safety of Ottodot, its users or the public as required or permitted by law.

If Ottodot becomes involved in a merger, acquisition, or any form of sale of some or all of its assets, we will ensure the confidentiality of any personal information involved in such transactions and provide notice before personal information is transferred and becomes subject to a different privacy policy.

We may share with third parties certain pieces of aggregated, non-personal information, such as the number of users who searched for a particular term, for example, or how many users clicked on a particular item. Such information does not identify you individually.

Information security

We take appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. These include internal reviews of our data collection, storage and processing practices and security measures, as well as physical security measures to guard against unauthorized access to systems where we store personal data.

We restrict access to personal information to Ottodot employees, contractors and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Data integrity

Ottodot processes personal information only for the purposes for which it was collected and in accordance with this Privacy Policy or any applicable service-specific privacy notice. We review our data collection, storage and processing practices to ensure that we only collect, store and process the personal information needed to provide or improve our services or as otherwise permitted under this criminal prosecution, if they fail to meet these obligations. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

Accessing and updating personal information

When you use Ottodot services, we make good faith efforts to provide you with access to your personal information and either to correct this data if it is inaccurate or to delete such data at your request if it is not otherwise required to be retained by law or for legitimate business purposes. We ask individual users to identify themselves and the information requested to be accessed, corrected or removed before processing such requests, and we may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, or would be extremely impractical (for instance, requests concerning information residing on backup tapes), or for which access is not otherwise required. In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. Some of our services have different procedures to access, correct or delete users' personal information. We provide the details for these procedures in the specific privacy notices or FAQs for these services.

Enforcement

Ottodot regularly reviews its compliance with this Privacy Policy. Please feel free to direct any questions or concerns regarding this Privacy Policy or Ottodot's treatment of personal information by contacting us through this web site or by writing to us at info@ottodot.com.

When we receive formal written complaints at this address, it is Ottodot's policy to contact the complaining user regarding his or her concerns. We will cooperate with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of personal data that cannot be resolved between Ottodot and an individual.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent, and we expect most such changes will be minor. Regardless, we will post any Privacy Policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

Each version of this Privacy Policy will be identified at the top of the page by its effective date, and we will also keep prior versions of this Privacy Policy in an archive for your review.

If you have any additional questions or concerns regarding this Privacy Policy, please contact us at info@ottodot.com.