# **Privacy Policy**

Qode respects the privacy of the personal information and your data and will ensure compliance by its staff to the strictest standards of security and confidentiality in respect of all personal information and data submitted by you via the Site and Qode will not, subject to the terms herein, release such information to anyone without your prior consent (whether registered or not).

You are strongly recommended to read this privacy statement ("Privacy Statement") carefully to have an understanding of Qode policy and practices with regard to the treatment of personal information and data provided by Users on the Site. This Privacy Statement is applicable to both registered and unregistered Users, and the terms herein may be updated, revised, varied and/or amended from time to time as Qode may deem necessary and/or appropriate.

By registering for or using the services/Site, or by clicking the 'Sign up' button, you:

- Consent to Qode and/or Qode' group companies collecting, using, disclosing and/or processing your personal data for the purposes as described below;
- Consent to Qode and/or Qode group companies disclosing your personal data to Qode and/or Qode' group companies' third party service providers or agents (whether within or outside Singapore) for the purposes as described below.

If you have questions or concerns regarding this Privacy Statement, please contact the Data Protection Officer, whose contact details are set out under the section headed "Enquiries" below.

In this Privacy Statement, the following terms shall have the respective meanings specified below unless the context otherwise requires:

"Advertiser(s)" means a User or Company who places a job advertisement or promotes any job related activities via the Site.

"Qode" means Olik Pte Ltd.

"Qode Group" means Olik Pte Ltd, Qode Singapore Pte Ltd, and any other subsidiaries of Olik Pte Ltd.

"Job Seeker(s)" means users seeking employment.

"Sign up User(s)" means Users who sign up on the Site to obtain services offered by Qode. Unless the context provides otherwise, references in this Privacy Statement to "users" or "you" include references to generic users and Registered Users.

"Site" means any website, job portal or mobile application owned and operated by Qode and its affiliates/subsidiaries or its service providers.

## **Purpose of Collection and Use of Personal Data**

In the course of using the Site, you may disclose or be asked to provide personal information and/or data. In order to have the benefit of and enjoy various services offered by the Site, it may be necessary for you to provide Qode with your personal information and/or data. Although you are not obliged to provide the information and/or data as requested on the Site, Qode will not be able to render certain services on the Site in the event that you fail to do so.

Qode purposes for collecting and using the information and data on the Site include but are not limited to the following:

- for the daily operation of the services provided to you;
- to assist you to find appropriate employment with Employers and to assist Employers to assess the suitability of candidates for a job vacancy for a wide spectrum of jobs and industries;

- to provide you with various services offered by the Site and newsletters, information on job openings and promotional and marketing materials (for further details, please refer to section headed "Subscription of Newsletter/Promotional Materials/Marketing Materials" below);
- to handle and follow up on enquiries, requests and complaints from you;
- to contact you regarding administrative notices and communications relevant to your use of the Site and to respond to your inquiries or requests;
- to assist Qode with developments for future marketing and promoting purposes or other internal purposes;
- to verify your identity in posted advertisements, materials, representations, messages, views or comments or such other information (collectively "Information") on the Site;
- to identify who viewed the Information posted on the Site;
- to allow you to enjoy your benefits as members of the Site by enrolling for special events and promotions hosted by Qode and/or its affiliates and/or partner companies;
- to facilitate Qode and/or its affiliates to use your personal data for the purposes relating to the provision of services offered by Qode and marketing services and/or special events of Qode and/or its affiliates;
- to obtain statistics to analyze usage of the Site in order to help its further development; and
- for purposes other than the above mentioned which are related to Qode and/or its affiliates' provision of their product and/or services.

Before using the Site or disclosing any information or data on the Site, if you are a minor in the jurisdiction in which you reside, you should seek prior consent from a person with parental responsibility for you, e.g. parent or guardian, who may contact the responsible Data Protection Officer whose contact details are set out under the section headed "Enquiries".

Qode strives to only collect personal data which are necessary and adequate but not excessive in relation to the purposes set out hereinabove.

If Qode requires the use of your personal data for a purpose other than those set out hereinabove, we will request your prescribed consent to the same. If you are a minor, the prescribed consent should be given by your parent or guardian.

#### **Collection of Personal Data**

Qode may collect personal information and/or data about you, such as your name, login ID and password, address, email address, phone number, age, gender, date of birth, country of residence, nationality, education level and work experience that is/are not otherwise publicly available. Occasionally, Qode may also collect additional personal information and/or data from you in connection with contests, surveys, or special offers.

Only duly authorized staff of Qode will be permitted to access your personal information and data, and Qode shall not release such personal information and data to any third parties except in the circumstances listed under the section headed "Disclosure or Transfer of Data" below.

### **Disclosure or Transfer of Data**

Qode agrees to take all practicable steps to keep all personal information and data of Users confidential and/or undisclosed, subject to the following.

Generally speaking, Qode will only disclose and/or transfer your personal information and/or data to Qode personnel and staff for the purpose of providing services to you and corporate clients of Qode who have made specific requests for such information and/or data with your prior consent. However, Qode may disclose and/or transfer such information and/or data to third parties under the following circumstances:

where the information and/or data is disclosed and/or transferred to any third party suppliers
or external service providers who have been duly authorized by Qode to use such
information and/or data and who will facilitate the services on the Site, under a duty of
confidentiality;

- where the information and/or data is disclosed and/or transferred to any agents, affiliates or associates of Qode who have been duly authorized by Qode to use such information and/or data;
- where permitted under the "Terms and Conditions" including the "Talent Search Terms and Conditions" (see the Profiles Section below);
- where Qode needs to protect and defend its rights and property;
- where Qode considers necessary to do so in order to comply with the applicable laws and regulations, including without limitation compliance with a judicial proceeding, court order, or legal process served on the Site;
- where Qode deems necessary in order to deliver the products and services that we offer and cultivate a positive user experience; and/or
- where Qode deems necessary in order to maintain and/or improve the services on the Site.

Personal data collected via the Site may be transferred, stored and processed in any country in which Qode or any member of the Qode Group operates. By using the Site, you are deemed to have agreed to, consented to and authorized Qode to disclose and/or transfer your personal information and data under the circumstances stated above, as well as to any transfer of information (including the Information) outside of your country.

#### **Qode Advertisers and Online Applications**

Making an online application to a job advertisement on the Site is a free and optional service that requires you to complete mandatory fields (for example first name, last name, phone and email) so that Advertisers can identify and contact the applicants. When you apply for a job advertisement on the Site, applications, including attachments and cover letters, are:

- forwarded directly on to the Advertiser and/or its nominated representative; and/or
- stored in the Qode Employers Portal.

The Qode Employers Portal allows Advertisers to easily and effectively manage their recruitment process via one central facility made available by Qode.

By applying to a position advertised on the Site you are requesting that Qode pass the information you provide to the relevant Advertiser and/or their nominated representative. Any questions you have relating to a position advertised on Qode, your online application and/or the status of your application should be directed directly to the Advertiser or their nominated agent, not Qode.

Any Personal Information retained by Qode as part of your application will only be used in accord with this Privacy Statement. The use of your information (personal or otherwise) by Advertisers is not within the control of Qode and if you have any questions about how an Advertiser uses your personal information or want to request access to any personal information that you have sent as part of an application or that has been provided to them as part of a Qode Profile (as defined below), you have the right to contact that Advertiser directly.

#### **Qode Profile**

Qode provides all Registered Users with the option of creating a personal Qode Profile ("Qode Profile"). A Qode Profile can include a resume, employment and educational history, contact details, salary expectations, notice period and preferred job classifications and locations. Advertisers who are approved by Qode are able to search Qode Profile database to find and contact relevant candidates.

If you have replied to a job invitation sent by an Advertiser or you have applied for jobs directly on the Site using your profile, that Advertiser will have access to your up-to-date profile, including your contact details (as updated by you from time to time).

All information provided when creating a Qode Profile (including your name, resume, email address, telephone numbers, employment and educational history) may be used by Qode for the purpose of improving placement opportunities for you or for tailoring specific products to you.

Where you create a Qode Profile on Qode, you consent to your profile being viewed and/or accessed by Advertisers using the websites of any member of the Qode Group, which may result in

the transfer of your personal data from Singapore to the other countries in which the other members of the Qode Group operate.

As a Registered User, you can modify your Qode Profile, your resume or modify the privacy options in relation to your Qode Profile at any time, by going to the Profile area of the Site.

You may also elect to clear your Qode Profile altogether. Cleared Qode Profiles may still however be stored by Qode in testing or backup systems for a period of time. Qode reserves the right to disable or clear a Qode Profile at any time at its sole discretion.

Advertisers that purchase job ads on Qode, and that purchase Qode Profiles are asked by Qode to comply with all relevant laws and obligations relating to the use and disclosure of personal information. The use of your information (personal or otherwise) by these Advertisers is not within the control of Qode and we cannot accept responsibility for the conduct of these companies.

## **Storing Your Resume**

You may elect to store resumes in your Qode account, and use those resumes when applying for a job.

In order to provide Advertisers with the most relevant information about you, social network information (including but not limited to GitHub or LinkedIn profiles) that you provide may also be scanned by Qode and relevant content may be displayed to Advertisers. If you do not want content from social networks to be displayed to Advertisers, do not provide social network information.. For more information on how your resume will be used, see above under the heading "Qode Profile".

## **Subscription of Newsletter/Promotional Materials/Marketing Materials**

Qode and its affiliates may from time to time send to members and Users of the Site newsletters, information on job openings, and marketing materials based on the personal information and data that they have provided to Qode. Qode may use your data in direct marketing and Qode requires your consent (which includes an indication of no objection) for that purpose. In this connection, please note that:

- your name, login ID and password, contact details, age, gender, date of birth, country of residence, nationality, education level and work experience from time to time may be used by Qode and/or its authorized personnel or staff in direct marketing;
- the following classes of services, products and subjects may be marketed:
  - job-hunting and agencies services offered other than by Qode
  - various courses, programs and career opportunities;
  - special events hosted by Qode, including but not limited to courses, workshops, and competitions;
  - reward, loyalty or privilege programs and related products and services;
  - special offers including coupons, discounts, group purchase offers and promotional campaigns;
  - products and services offered by Qode' affiliates and advertisers (the names of such affiliates and advertisers can be found in the application form(s) for the relevant products and services, as the case may be);
  - donations and contributions for charitable and/or non-profit making purposes;
- the above products, services and subjects may be provided or (in the case of donations and contributions) solicited by Qode and/or;
  - Qode' affiliates:
  - third party service providers providing the products, services and subjects listed in paragraph (b) above; and
  - charitable or non-profit making organizations;
- in addition to marketing the above services, products, and subject itself, Qode also intends to provide the data described in paragraph (a) above to all or any of the persons described in paragraph (c) above for use by them in marketing those services, products and subjects, and Qode requires your written consent (which includes an indication of no objection) for that purpose; and

Qode may receive money or other property in return for providing the data to the other
persons in paragraph (d) above and, when requesting your written consent as described in
paragraph (d) above, Qode will inform you if Qode receives any money or other property in
return for providing the data to other persons.

In this regard, you may choose to sign up or unsubscribe for such materials by logging into the registration or Settings page, or clicking on the automatic link appearing in each newsletter/message or contacting Qode using the contact details under the section headed "Enquiries".

### Access to or Request for Correction of Data

You are entitled to request access to or make amendments to your own personal information and data kept with Qode by contacting Qode using the contact details set out under the section headed "Enquiries". Subject to the paragraph below, you may alternatively edit, amend or delete your personal information and data at any time by logging into the "My Profile" section of the Site.

In the event that you wish to access or amend your personal information and data, Qode may request you to provide personal details in order to verify your identity.

Qode will respond to your request as soon as reasonably possible. Should Qode not be able to respond to your request within thirty (30) days after receiving your request, Qode will inform you in writing within thirty (30) days of the time by which Qode will be able to respond to your request. Where legally permitted, if Qode is unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so.

## **Cookies and Log Files**

Qode does not collect any personally identifiable information from you while you visit and browse the Site. When you access the Site, Qode records your visits only and does not collect your personal information or data. The Site's server software will also record the domain name, server, address and track the pages you visit and store such information in "cookies", and gather and store

information such as internet protocol (IP) addresses, browser type, referring/exit pages, operating system, date/time stamp, and clickstream data in log files. All these are done without you being aware that they are occurring.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can modify their individual browser settings to decline cookies if they prefer. However, you should note that disabling cookies on their browser may prevent them from taking full advantage of the Site.

Qode does not link the information and data automatically collected in the above manner to any personally identifiable information. Qode generally uses such automatically collected information and data to estimate the audience size of the Site, gauge the popularity of various parts of the Site, track your movements and number of entries in Qode' promotional activities and special events, measure traffic patterns and administer the Site. Such automatically collected information and data will not be disclosed save and except in accordance with the section headed "Disclosure or Transfer of Data".

In addition, our third party advertising companies may place cookies on some of the pages you visit on the Site. These cookies are designed to collect non-personally identifiable information in order to analyze your interests and searches on our Site to help deliver more relevant advertisements when you visit our Site. The non-personally identifiable information collected by these cookies may be shared with other third parties for the purpose of managing and targeting advertisements and for market research analysis.

## **Links to Other Websites**

The Site may provide links to other websites which are not owned or controlled by Qode or its affiliates. Personal information and data from you may be collected on these other websites when you visit such websites and make use of the services provided therein. Where and when you decide to click on any advertisement or hyperlink on the Site which grants you access to another website, the protection of your personal information and data which are deemed to be private and confidential may be exposed in these other websites.

If you register on the Site via your accounts from social networking sites (including but not limited to Facebook, Google and LinkedIn), you are deemed to have consented to the terms of this Privacy Statement, and such your personal data provided to those networking tools may be obtained by Qode and be used by Qode and its authorized persons in and outside of the your country for the purpose of providing services and marketing materials to the you. Where this occurs, you will be provided clear notice by these social networking sites. Qode and its authorized personnel may gain access and use your personal data obtained in such a way, subject to the other provisions of this Privacy Statement.

This Privacy Statement is only applicable to the Site. You are reminded that this Privacy Statement grants no protection to your personal information and data that may be exposed on websites other than the Site, and Qode is not responsible for the privacy practices of such other websites. You are strongly recommended to refer to the privacy policies of such other websites before using those websites.

#### **Testimonials**

Qode posts Users' testimonials on the Site, which may contain personally identifiable information such as the Users' names. Qode does obtain the Users' consent prior to posting the testimonials to post their names along with their testimonials.

#### Security

The security of your personal information and data is important to Qode. Qode will always strive to ensure that your personal information and data will be protected against unauthorized access. Qode has implemented appropriate electronic and managerial measures in order to safeguard, protect and secure your personal information and data.

All personal information and data provided by you are only accessible by the authorized personnel of Qode or its authorized third parties, and such personnel shall be instructed to observe the terms of this Privacy Statement when accessing such personal information and data. You may rest assured that their personal information and data will only be kept for as long as is necessary to fulfill the

purpose for which it is collected. You should safeguard your unique Username and Password by keeping it secret and confidential and never share these details with anyone.

Qode uses a third party service provider to facilitate the electronic payment transactions on the Site.

Qode follows generally accepted industry standards to protect the personal information and data submitted by you to the Site, both during transmission and once Qode receives it. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while Qode strives to protect your personal information and data against unauthorized access, Qode cannot guarantee its absolute security.

#### **Retention of Personal Data**

Once Qode has obtained your personal information and/or data, it will be maintained securely in Qode' system for the period necessary to fulfill the purposes for which the data was collected as set out under the section headed "Purpose of Collection of Personal Data". Once registered, you may terminate your membership of the Site by contacting Qode using the contact details under the section headed "Enquiries". Qode may retain your personal information even after you have closed your account if retention is reasonably necessary to comply with our legal obligations, meet regulatory requirements, resolve disputes between Users, prevent fraud and abuse, or enforce this Privacy Statement and the Terms and Conditions.

## **Changes in this Privacy Statement**

Qode reserves the right to update, revise, modify or amend this Privacy Statement at any time as Qode deems necessary, so you are strongly recommended to review this Privacy Statement frequently. If Qode decides to update, revise, modify or amend this Privacy Statement, Qode will post those changes to this webpage and/or other places as Qode deems appropriate, so that you would be aware of what information Qode collects, how Qode uses it, and under what circumstances, if any, Qode discloses it.

If Qode makes material changes to this Privacy Statement, Qode will notify you on this webpage, by email, or by means of a notice on the home page of Qode.

Such changes to this Privacy Statement shall apply from the time that Qode posts the same on this webpage. Your continued use of the Site and services on the Site shall constitute acceptance of the changes to this Privacy Statement.

## **Enquiries**

Should you have any enquiries relating to this Privacy Statement, please contact us through the chat facilities available on the Site or email Qode at contact@qode.world or write to us at the following address:

Olik Pte Ltd

1 Irving Place #09-01, Singapore 369551