

Privacy Policy of Creatory (by MoneyHero Group)

Platform Date of Last Revision: 6th June 2023

This privacy policy (the “**Privacy Policy**”) applies to all visitors and users (“**you**” or “**Creatory User**”) of the Creatory (by MoneyHero Group) Platform located at <https://beta.creatory.hyphengroup.io/> and <https://creatory.hyphengroup.io>) and hosted services and websites (together the “**Creatory Platform**”), including the community forum located at <https://thecreatory.mn.co> (“**Creatory Community Forum**”), our mobile applications and any other websites or applications we operate (unless those websites or applications have posted separate or additional terms of service) (collectively, the “**Website**” or “**Websites**”), which are offered by the relevant eKos Entity (as defined below) and/or any of its affiliates (“**Creatory**” or “**we**” or “**us**”) and describes how we process your Personal Data in connection with those Websites, and how we collect information through the use of cookies and related technologies. It also tells you how you can access and update your Personal Data.

Please read this entire Privacy Policy carefully. By accessing, using or interacting with any part of the Websites, you acknowledge you have been informed of and expressly consent to our practices described in this Privacy Policy with regard to your Personal Data (as defined below).

Terms used herein but not defined will have the meaning given to them in the Terms of Service of Creatory (by MoneyHero Group) Platform (the “**Terms of Service**”), which are available within the Creatory Platform. This Privacy Policy is incorporated into our Terms of Service.

Definitions

“eKos Entity” means the relevant entity specified in the Commercial Terms, being any one of the following:

- eKos Pte Ltd. (Singapore)
- eKos Limited (Hong Kong)
- Money101 Company Limited (Taiwan)
- eKos Inc. (Philippines)

“Personal Data” means any data relating directly or indirectly to an individual from which it is possible to identify that individual.

“Relevant Country” means the relevant country specified in the Commercial Terms, , being either Singapore, Hong Kong, Taiwan [or Philippines].

Who We Are

The Creatory Platform and the Websites are owned and operated by Creatory. We are part of MoneyHero Group (previously known as CompareAsia Group), a leading personal finance marketplace across Asia.

The Creatory Platform is a pay-per-action platform that displays personal finance product offers and campaign information to content creators. With the Creatory Platform, content creators can monetise

their online content by placing Links on their Site to personal finance products and offers advertised in the Creatory Platform.

Information We Collect

We collect information about you in three main ways: when you provide it to us, with automatic technologies and when third party sources provide it to us.

Information You Provide Us

When you interact with us through the Websites, you may provide Personal Data and other information to us in various ways. The following are examples (without limitation) of the circumstances in which we collect Personal Data:

- When you register an account on the Websites, we may ask for your name, gender, nationality, country of residence, email address, telephone number, social media handles and/or mobile number.
- When you register an account on the Creatory Platform, we may collect your email address and/or basic profile info (profile picture and full name) and any other data that you would have explicitly consented to our collection
- When you contact us with enquiries, we may ask for your name, email address and/or phone number, so that we can contact you regarding your query;
- When you voluntarily provide us feedback on the Creatory Platform and/or Websites; • We may ask you to provide additional information (such as identity documents, proof of address) we can use in order to verify your identity, address, organization, billing and/or invoicing information;
- Any information you provide through your posts on the Creatory Community Platform.

Automatic Collection of Computer Data

In addition, when you use the Websites, we may automatically collect certain data about how you access and interact with the Websites. Automated technologies, such as our use of 'cookies', help us achieve our goal of providing you with the best possible service. When you access the Websites, our servers will record or track information sent from the browsers. This can include the following information (without limitation):

- attributes of the equipment or device you are using, such as the operating system, hardware version, device settings, software and device identifiers;
- device locations, including specific geographic locations identified through GPS, Bluetooth or WiFi signals or other means;
- connection information such as the name of your mobile operator, ISP or other service provider, browser type and IP address;
- the website from which you have accessed the Creatory Platform
- the Website pages viewed and/or details of the information, tools and features available through the Creatory Platform that you interact with;
- links from our Website that you click on; and
- information related to any of the above.

Our use of cookies enables us to:

- provide you with a more personalised experience using the Creatory Platform. • study

browsing habits on this Website. The more we understand what products you are interested in, the greater our ability to offer you customized solutions and targeted advertisements and other marketing materials; and

- obtain information regarding the number of visitors to this Website and the pages viewed.

In most cases, cookies are deleted when you close your browser; these are referred to as session cookies. However, persistent cookies stay on your browsing device either until such time as you delete them or they expire. By using the Websites, you consent to us using cookies.

You can alter your computer browser settings to block or delete cookies. If you opt to block or delete cookies of the Websites, you may not be able to access certain products or services and this could have an effect on the performance of the Websites on your system (for example, banner ads may not display properly).

We also use cookies, javascript, query parameters and/or other tracking codes in order to track when an End User delivers an advertising impression so that we can correctly credit it to that Creatory User and the relevant Product Provider, and invoice accordingly.

Using the above, Creatory uses product analytics tools including:

- Google Analytics and Google Display Network features including advertising and remarketing. Please visit <https://www.google.com/settings/ads/> if you would like to opt out of any of these features.
- a tool called PostHog which tracks user behaviour on the Creatory Platform. We currently use PostHog Cloud, whereby PostHog acts as a processor of any data we send to PostHog. You can review how PostHog uses data, the list of its sub-processors and how to opt out of basic tracking [here](#).

You should note that opting out or enabling “Do Not Track” settings may have an impact on your ability to avail of some or all of our services, or prevent us to execute any commercial agreement we have entered into.

Information Provided To Us By Third-Party Sources

We may also receive information about you from other third parties we have engaged such as business associates, subcontractors, analytics providers, platform providers, search information providers, credit bureaus and identity verification services. We may also receive information about you from our Partners with whom you do business. This may happen if you have promoted products/services of a company that has recently started using our technology and wants to give us your information so that we can request you to join its campaign on the Creatory Platform.

Accuracy & Retention of Personal Data

By providing us with your Personal Data, you warrant that such data is true and accurate and undertake to notify us as soon as practicable of any change or alteration to the same. Any loss or damage caused to the Websites or to the person responsible for the Websites or to any third person through the provision of erroneous, inexact, or incomplete information will be your exclusive and absolute responsibility.

All Personal Data that has been collected from you will only be stored for a duration that is relevant to the purpose for which it was processed and for as long as permissible by applicable law(s).

We will only retain your Personal Data for as long as reasonably necessary to fulfill the purposes we collected it for (further detailed in the "What do we use your Information for?" section below), including

for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your Personal Data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

You have the right to request access to and correction of your Personal Data as held by us. Please contact us at: team@creatory.MoneyHerogroup.io at any time if you wish to correct, amend, or update your Personal Data. We aim to acknowledge and act upon your request promptly. To help us respond in the most timely and appropriate way, please be as specific as possible in your request or inquiry. If, for any reason, we are unable to accede to your request, you will be notified accordingly.

What Do We Use Your Information For?

We use the information we collect about you for our legitimate business interests to operate the Websites, to enhance and customise users' experiences with the Websites and to improve and grow our business. Some examples of how we may use the Personal Data we collect include the following (without limitation):

- to set up and administer your account with us;
- to allow you access to the Creatory Community Forum;
- to verify your identity through manual and/or eKYC checks and to perform any sanctions and/or other background screenings (as necessary);
- to respond to your requests for further information about Websites, our software as a service offering, our professional services, and our company, and to otherwise communicate with you;
- to analyse customer usage and behaviour, market trends and client demographics so that we can improve the content and functionality of our Services and provide a more bespoke user experience and more relevant communications to you;
- with your consent, for promotions and direct marketing purposes (see "Keeping You Updated" below);
- to store data and to manage our business operations efficiently;
- to comply with our legal and regulatory obligations;
- to diagnose and prevent service, security or technical issues affecting the Websites;
- to monitor, detect and prevent fraud or abuse of the Websites;
- to protect the safety, integrity and/or rights of our users or any third party; and/or
- to enable us to provide services and products related to the above and/or otherwise related to your use of the Websites.

How Do We Disclose Your Information?

We are committed to keeping your Personal Data and other information shared with us confidential. There are, however, certain circumstances in which we may disclose or transfer your Personal Data to certain third parties without further notice to you, as set forth below:

- **Tracked Activities:** To provide you our services, we may need to share some of your information with the entity that you are involved in a transaction with (including where such involvement is conducted via Creatory as the contracting party). If necessary to facilitate the transaction, we may share your contact information, and certain other information you have provided with us, or we have collected through the Websites.
- **Related Companies:** We may share your Personal Data with our affiliates in the MoneyHero

Group (subsidiaries/affiliated companies of eKos Entity, including its parent company, CompareAsia Group Limited (“**CAGL**”) and CAGL’s direct and indirect subsidiaries) that provide services to, or share services with, Creatory.

- **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of, or in preparation for, a change of control, merger, acquisition, restructuring, dissolution or similar event, we may disclose or transfer Personal Data to a third party.
- **Platform and Hosting Service Provider(s):** Such platforms provide a wide range of tools – including analytics, user registration, commenting, database management, e-commerce, payment processing – that imply the collection and handling of Personal Data. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data is stored. The Creatory Platform is hosted on Scaleo, affiliate marketing software that is provided by Owly Labs s.r.o. We share your Personal Data with Scaleo for managing the affiliate programs made available through the Creatory Platform and tracking conversions through Scaleo’s affiliate management software. Scaleo processes and stores your Personal Data in accordance with its privacy policy (<https://www.scaleo.io/privacy>).
- **Agents, Consultants and Other Service Providers:** We rely on service providers to help support our business and the Websites, for example (without limitation) our IT and analytics service providers, back-office support, business consultants, legal service providers and marketing service providers. When we engage another entity to perform a function of this nature, we only provide them with the information that they need to perform their specific function.
- **Legal Requirements:** We and/or any of the third parties listed above may also be required to disclose your Personal Data to any court, law enforcement body, government department, listing exchange, regulator or industry body of any country where required by the laws of the Relevant Country or any other jurisdiction in which MoneyHero Group does business, or in response to a lawful request in the Relevant Country or elsewhere. We may also need to disclose your Personal Data in order to protect or enforce the rights or property of Creatory, to protect the personal safety of users of the Websites and/or the public or to defend against legal liability.
- **Other Creatory Users:** The Websites (and in particular the Creatory Community Forum) contain features that allow you to upload, post, transmit, display, perform or distribute content, including personal information about yourself. Once you have chosen to divulge information about yourself to another user, multiple users, and/or the public at large by accessing the Websites — including in a "members-only" forum, direct message or otherwise—such information can be copied, transmitted or displayed by the recipient(s) and is no longer within our ability to control. We share this information in order to provide the Creatory Community Forum and the Websites, and to allow you and other Creatory Users the opportunity to communicate.

By using the Websites, you expressly consent to the disclosure of your information to the above parties. You also agree and understand that in connection with the purposes set out in this Privacy Policy, your Personal Data may be transferred to jurisdictions outside the Relevant Country and/or the country of your residence. That means your Personal Data may not be protected to the same or similar level as it would in the Relevant Country and/or the country of your residence. However, we will take all reasonable measures to ensure that your data is processed and stored securely, regardless of the country in which it is processed or stored.

Links To Other Sites

The Creatory Platform contains hyperlinks to websites owned and operated by third parties. These third-party websites have their own privacy policies, including cookies, over which we have no control, and we urge you to review them. They will govern the use of your Personal Data which is submitted/collected while you visit these websites. We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

Data Security

We are fully committed to safeguarding the privacy of our customers, online and otherwise, and the success of our business depends on our ability to maintain the trust of our clients and customers. We apply Defense in Depth approach in securing Personal Data entrusted to us by our customers and continuously improve those measures to address security risks. We use Amazon Web Services, Inc (“AWS”) as our technology infrastructure service provider to power the main core of our Websites. Data we collect is stored in data centres operated by AWS which offer best-in-class security. For more information, please visit: <https://aws.amazon.com/security/>

When you register for an account with us, you will be asked to choose a password. It is your responsibility to keep your password safe, and not share it with anyone. We are not responsible for any transactions conducted by a third party that has logged in to your account using your password. If you suspect that your account has been used by someone other than you, please notify us straight away.

Despite our security precautions, we cannot fully guarantee the security of your Personal Data because of the inherent risks of data transmission over the internet. At all times, you assume the risks associated with the transmission of your Personal Data over the internet and the possibility of malware present on your device used for the Websites. Therefore, you should ensure that you only enter or upload your Personal Data on a secure device within a secure environment.

Consent

We are fully committed to safeguarding the privacy of its customers, online and otherwise, and the success of our business depends on our ability to maintain the trust of our clients and customers.

This Privacy Policy supplements but does not supersede nor replace any other consents you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

Keeping You Updated

In connection with your use of the Websites, and provided you give your explicit consent, from time to time we may use your Personal Data (including your name, address, email address and telephone number) to inform you of events, initiatives, products and services that we think may be of interest to you.

In connection with your use of the Websites, we may request your permission to use your Personal Data for other informative purposes, for example, to inform you of products and services that may be

of interest to you or for other general marketing purposes.

You will always be provided the opportunity to opt-in to further contact by us. You can opt out of direct marketing, free of charge, at any time (see "Your Rights" below).

Improving Our Service

In order to ensure that the services we offer you continue to meet your requirements; we might ask for your feedback. Any feedback or other information you submit to us ("**Submissions**") will unless otherwise stated be used in accordance with this Privacy Policy and our Terms of Service.

Storage, Security and Retention

Keeping your data secure is important to us and we take reasonable steps to protect the Personal Data provided via the Websites from loss, misuse, and unauthorised access, disclosure, alteration or destruction. However, no information transmission over the internet or email is 100% secure or error free.

All Personal Data that has been collected from you will only be stored for a duration that is relevant to the purpose for which it was processed and for as long as permissible by applicable law(s), in any event no longer than necessary for purposes mentioned in the "What Do We Use Your Information For?" section above.

International Users

Your Personal Data will be transferred out of the Relevant Country for processing and stored by Creatory on its servers (located in Singapore) and as otherwise set out above. By choosing to use the Websites or otherwise provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the Relevant Country's law and the adjudication of any disputes arising in connection with the Websites will be in accordance with the Terms of Service.

If you are visiting or accessing the Websites from the European Union or any other regions outside of the Relevant Country with laws governing data collection and use, please note that by using the Websites you are consenting and agreeing to the transfer of your information outside the Relevant Country and to the global processing of such information. By providing your information, you consent to any transfer and processing in accordance with this Privacy Policy.

Changes to this Privacy Policy

We may need to revise or update this Privacy Policy from time to time in order to reflect changes in the Websites, our business or applicable law. We reserve the right to modify this Privacy Policy periodically without prior notice. Your continued access or use of the Websites after any changes or revisions to this Privacy Policy will be deemed to constitute your agreement with the terms of such revised Privacy Policy. We will always include a 'last revised' date as part of our privacy policy. You may check this page periodically to stay informed on our Privacy Policy.

Your Rights

You have the right to check whether we hold Personal Data about you and to require access or correction of your Personal Data. You can also opt out of receiving direct marketing or promotional communications from us and/or any of our affiliates.

If you wish to exercise any of your above-mentioned rights, or you have any inquiries or complaints in respect of your Personal Data, you may address your enquiries to us at team@creatory.hyphengroup.io

Language

In the event of any inconsistency between the English version and the local language version of this Privacy Policy, the English version shall prevail.