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## Privacy Policy

Updated on: 31 August, 2021

Effective Date: 31 August, 2021

As integrationWorks Asia Co., Ltd. (hereinafter "integrationWorks Asia " or "We") we only collect information that we actually need from you so that you can use the Services of our SaaS IIoT platform OCTOBUS properly. Some of that is information that you actively give to us when you sign up for an account, ask for customer support via our [Service Desk](#), or sign up for a subscription. We store your name and contact information; we don't store credit card numbers as they are stored with the third-party payment gateways only.

When you visit one of our websites or use our software, we automatically log some basic information like how you got to the site, where you navigated within it, and what features and settings you use. We use this information to improve our websites and services and to drive new product development.

Sometimes we receive information indirectly. If you ask about our products through one of our referral programs or reselling partners or sign in to one of our products through an authentication service provider like LinkedIn or Google, they'll pass on your contact information to us. For now (Effective Date above) there is no Social Login Plugin - but we will develop such one in the future and then update this Privacy Policy document. We won't be responsible for their Privacy Policies as these services are third-party services and you can use them entirely voluntary. We cannot be hold accountable for any of their practices.

We will use that information to complete the request that you made. If you engage with our brand on social media (for instance, liking, commenting, retweeting, mentioning, or following us), we'll have access to your interactions and profile information. We'll still have that information even if you later remove it from the social media site.

We appreciate your trust and understand that you want to know more how your provided information that you share with us will be used. Therefore, you find in this document - our Privacy Policy - more information about this matter.

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This Privacy Policy applies to our website, and its associated subdomains (collectively, our "Services") alongside our application, OCTOBUS. By accessing or using our Services, you signify that you have read, understood, and agreed to our collection, storage, use, and disclosure of your personal information as described in this Privacy Policy and our Terms & Conditions of Service which can be found on our website during the registration process and as linked documents in the [Service Desk](#). As soon as you start using the Services you have accepted and agreed on both.

## Definitions and key terms

To help explain things as clearly as possible in this Privacy Policy, every time any of these terms are referenced, are strictly defined as:

- **Cookie:** small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, and remember information about you such as your language preference or login information.
  - **Company:** when this policy mentions "Company," "we," "us," or "our," it refers to integrationWorks Asia Co., Ltd., 170 Ocean Tower 1 20th Floor, Suite 170/62 New Ratchadapisek Road, Klongtoey Bangkok, 10110 that is responsible for your information under this Privacy Policy.
  - **Country:** where OCTOBUS or the owners/founders of integrationWorks Asia are based, in this case is Thailand.
  - **Customer:** refers to the company, organization or person that signs up to use the OCTOBUS Service to manage the relationships with your consumers or service users.
  - **Device:** any internet connected device such as a phone, tablet, computer, or any other device that can be used to visit OCTOBUS and use the services.
  - **IP address:** Every device connected to the Internet is assigned a number known as an Internet protocol (IP) address. These numbers are usually assigned in geographic blocks. An IP address can often be used to identify the location from which a device is connecting to the Internet.
  - **Personnel:** refers to those individuals who are employed by OCTOBUS or are under contract to perform a service on behalf of one of the parties.
  - **Personal Data:** any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.
  - **Service(s):** refer(s) to the service(s) provided by OCTOBUS as described in the Terms & Conditions of Service and on this platform.
  - **Third-party service(s):** refer(s) to advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you.
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- **Website:** OCTOBUS' sign in website, which can be accessed via this URL: <https://iot-web.octobus.asia/signin> and the landing page via <https://iot-web.octobus.asia>
  - **You:** a person or entity that is registered with OCTOBUS to use the Services.

### Information how integrationWorks Asia collects data

We collect information from you when you visit our website/platform, register on our site, sign up for a subscription, subscribe to our newsletter (if there will be one in the future), respond to a survey or fill out a form via our [Service Desk](#).

- Information about the Business Partner on company level
  - Required
    - Business Partner name (company name)
    - Business Partner ID (an abbreviation of the BP name)
    - Industry Segment(s) of the Business Partner (provide information from a list)
  - Optional
    - Address of the Business Partner
    - Contact details (phone, email, website, and social media links)
    - Contact details of company contact person (name, position, email, phone)
    - Logo (picture)
- Information about the user on single user level
  - Required
    - Name
    - Email
    - Password
  - Optional
    - Profile picture
    - Allowing GPS Google location via Browser to set marker on the map

During the sign-up process for a subscription more details like billing address and payment details are mandatory data which need to be provided by the admin customer.

### When do we use end user information from third parties?

OCTOBUS will collect End User Data necessary to provide the OCTOBUS services to our customers. End users may voluntarily provide us with information they have made available on social media websites. If you provide us with any such information, we may collect publicly available information from the social media websites you have indicated. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

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## **When do we use customer information from third parties?**

We receive some information from the third parties when you contact us. For example, when you submit your email address to us to show interest in becoming a OCTOBUS customer, we receive information from a third party that provides automated fraud detection services to OCTOBUS. We also occasionally collect information that is made publicly available on social media websites. You can control how much of your information social media websites make public by visiting these websites and changing your privacy settings.

## **Do we share the information we collect with third parties?**

Currently, we **don't** share information that we collect, both personal and non-personal, with third parties such as advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you. If this situation changes, we will inform you about that in advance.

We may share it with our current and future affiliated companies and business partners, and if we are involved in a merger, asset sale or other business reorganization, we may also share or transfer your personal and nonpersonal information to our successors-in-interest.

We may engage trusted third-party service providers to perform functions and provide services to us, such as hosting and maintaining our servers and the website/platform, database storage and management, email management, storage marketing, credit card processing, customer service and fulfilling orders for products and services you may purchase through the website/platform. We will likely share your personal information, and possibly some non-personal information, with these third parties to enable them to perform these services for us and for you.

We may share portions of our log file data, including IP addresses, for analytics purposes with third parties such as web analytics partners, application developers, and ad networks. If your IP address is shared, it may be used to estimate general location and other technographics such as connection speed, whether you have visited the website/platform in a shared location, and type of the device used to visit the website/platform. They may aggregate information about our advertising and what you see on the website/platform and then provide auditing, research and reporting for us and our advertisers.

We may also disclose personal and non-personal information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate in order to respond to claims, legal process (including subpoenas), to protect our rights and interests or those of a third party, the safety of the public or any person, to prevent or stop any illegal, unethical, or legally actionable

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activity, or to otherwise comply with applicable court orders, laws, rules and regulations.

## **Where and when is information collected from customers and end users?**

OCTOBUS will collect personal information that you submit to us. We may also receive personal information about you from third parties as described above.

## **How do we use collected information?**

Any of the information we collect from you may be used in one of the following ways:

- to personalize your experience (your information helps us to better respond to your individual needs)
- to improve our website/platform (we continually strive to improve our website/platform offerings based on the information and feedback we receive from you)
- to improve customer service (your information helps us to more effectively respond to your customer service requests and support needs)
- to process transactions
- to administer a contest, promotion, survey, or other site feature
- to send emails – only when significant announcements like changings in the Terms & Conditions of Service or Privacy Policy will happen to inform you about your rights. More information about this can be found in “how do we use your email address?” below.

## **How do we use your email address?**

By submitting your email address on our platform, you agree to receive emails from us.

Currently, we don't send email periodically like newsletters. If we inform our users about new deployments, we will do this on-screen with a notification and a link to the announcement.

If there are changes which affect the user and his rights, e. g. a substantial change of legal documents like our Privacy Policy or the Terms & Conditions of Service, we will inform you on-screen, but to highlight the importance we will send you an email as well to your provided email address.

If we decide to send newsletters in the future, you will be asked to register for it in advance before we include you in our newsletter mailing list. We only send emails to

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people who have authorized us to contact them, either directly, or through a third party. If you decide to cancel your participation in this email list, you can click on the opt-out link or other unsubscribe option that is included in the respective email at any time. Updating a mailing list may take a few days, but we will consider your request and won't send you any further newsletters after we updated the newsletter mailing list.

By submitting your email address, you also agree to allow us to use your email address for customer audience targeting on sites like Facebook, where we display custom advertising to specific people who have opted-in to receive communications from us.

Email addresses submitted only through the order processing page will be used for the sole purpose of sending you information and updates pertaining to your order. If, however, you have provided the same email to us through another method, we may use it for any of the purposes stated in this Policy.

Please note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

### **How long do we keep your information?**

We keep your information only as long as we need it to provide the Services of OCTOBUS to you and fulfil the purposes described in this policy. This is also the case for anyone that we share your information with and who carries out services on our behalf. When we no longer need your information and there is no need for us to keep it to comply with our legal or regulatory obligations, we'll either remove it from our systems or depersonalize it so that we can't identify you.

### **How do we protect your information?**

We implement a variety of security measures to maintain the safety of your personal information when you sign up for a subscription or enter, submit, or access your personal information. We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our Payment gateway providers database only to be accessible by those authorized with special access rights to such systems and are required to keep the information confidential. After a transaction, your private information (credit cards, social security numbers, financials, etc.) is never kept on file. We cannot, however, ensure or warrant the absolute security of any information you transmit to OCTOBUS or guarantee that your information on the Service may not be accessed, disclosed, altered, or destroyed by a breach of any of our physical, technical, or managerial safeguards.

### **Could your information be transferred to other countries?**

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integrationWorks Asia is incorporated in Thailand. Information collected via our website, through direct interactions with you, or from use of our help services may be transferred from time to time to our international offices or personnel, to maintain operations of OCTOBUS. To the fullest extent allowed by applicable law, by using any of the above, you voluntarily consent to the trans-border transfer and hosting of such information. Now (Effective Date above) OCTOBUS Services are hosted on AWS (Amazon Web Services) in Singapore and Frankfurt, Germany. New AWS nodes might be added. In that case this Privacy policy will be updated.

### **Is the information collected through us secure?**

We take precautions to protect the security of your information. We have physical, electronic, and managerial procedures to help safeguard, prevent unauthorized access, maintain data security, and correctly use your information. However, neither people nor security systems are fool proof, including encryption systems. In addition, people can commit intentional crimes, make mistakes, or fail to follow policies. Therefore, while we use reasonable efforts to protect your personal information, we cannot guarantee its absolute security. If applicable law imposes any non-disclaimable duty to protect your personal information, you agree that intentional misconduct will be the standards used to measure our compliance with that duty.

### **Can you update or correct your information?**

At any time and we please you to do so if necessary.

Customers have the right to request the restriction of certain uses and disclosures of personally identifiable information as follows. You can contact us to (1) update or correct your personally identifiable information, (2) change your preferences with respect to communications and other information you receive from us, or (3) delete the personally identifiable information maintained about you on our systems (subject to the following paragraph), by cancelling your account. Such updates, corrections, changes, and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion. To protect your privacy and security, we may take reasonable steps (such as requesting a unique password) to verify your identity before granting you profile access or making corrections. You are responsible for always maintaining the secrecy of your unique password and account information.

You should be aware that it is not technologically possible to remove each record of the information you have provided to us from our system. The need to back up our systems to protect information from inadvertent loss means that a copy of your information may exist in a non-erasable form that will be difficult or impossible for us to locate. Promptly after receiving your request, all personal information stored in databases we actively use, and other readily searchable media will be updated,

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corrected, changed, or deleted, as appropriate, as soon as and to the extent reasonably and technically practicable.

If you are an end user and wish to update, delete, or receive any information we have about you, you may do so by contacting the organization of which you are a customer.

### Personnel

If you are an integrationWorks Asia worker or applicant, we collect information you voluntarily provide to us. We use the information collected for Human Resources purposes to administer benefits to workers and screen applicants.

You may contact us to (1) update or correct your information, (2) change your preferences with respect to communications and other information you receive from us, or (3) receive a record of the information we have relating to you. Such updates, corrections, changes, and deletions will have no effect on other information that we maintain, or information that we have provided to third parties in accordance with this Privacy Policy prior to such update, correction, change or deletion.

### Sale of Business

We reserve the right to transfer information to a third party in the event of a sale, merger or other transfer of all or substantially all of the assets of integrationWorks Asia or any of its Corporate Affiliates (as defined herein), or that portion of integrationWorks Asia or any of its Corporate Affiliates to which the Service relates, or in the event that we discontinue our business or file a petition or have filed against us a petition in bankruptcy, reorganization or similar proceeding, provided that the third party agrees to adhere to the terms of this Privacy Policy.

In case one of these events happens, we will send you an email to inform you about that and notify all users with an on-screen notification and a link to get further details about it.

### Affiliates

We may disclose information (including personal information) about you to our Corporate Affiliates. For purposes of this Privacy Policy, "Corporate Affiliate" means any person or entity which directly or indirectly controls, is controlled by or is under common control with integrationWorks Asia, whether by ownership or otherwise. Any information relating to you that we provide to our Corporate Affiliates will be treated by those Corporate Affiliates in accordance with the terms of this Privacy Policy.

### Governing Law

This Privacy Policy is governed by the laws of Thailand without regard to its conflict of laws provision. You consent to the exclusive jurisdiction of the courts in connection with any action or dispute arising between the parties under or in connection with this Privacy Policy except for those individuals who may have rights to make claims under Privacy Shield, or the Swiss-US framework.

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The laws of Thailand, excluding its conflicts of law rules, shall govern this Agreement and your use of the platform. Your use of the platform may also be subject to other local, state, national, or international laws.

By using OCTOBUS or contacting us directly, you signify your acceptance of this Privacy Policy. If you do not agree to this Privacy Policy, you should not engage with our platform, or use our services. Continued use of the website and our platform, direct engagement with us, or following the posting of changes to this Privacy Policy that do not significantly affect the use or disclosure of your personal information will mean that you accept those changes.

### Your Consent

We've updated our Privacy Policy to provide you with complete transparency into what is being set when you visit our site and how it's being used. By using OCTOBUS, registering an account, or signing up for a subscription, you hereby consent to our Privacy Policy and agree to its terms.

### Links to other Websites

This Privacy Policy applies only to the Services of our SaaS IIoT platform OCTOBUS. The Services may contain links to other websites not operated or controlled by OCTOBUS. We are not responsible for the content, accuracy or opinions expressed in such websites, and such websites are not investigated, monitored, or checked for accuracy or completeness by us. Please remember that when you use a link to go from the Services to another website, our Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including those that have a link on our platform, is subject to that website's own rules and policies. Such third parties may use their own cookies or other methods to collect information about you.

### Cookies

We use "Cookies" only for user authentication. Cookies will be stored for one day from the previous usage session of our website. We declare that we don't use any Cookies for marketing or advertising purposes at least till further notice.

In the future we might use cookies to identify the areas of our SaaS IIoT platform OCTOBUS that you have visited. A Cookie is a small piece of data stored on your computer or mobile device by your web browser. We might will use Cookies to enhance the performance and functionality of our platform, but the usage won't be essential to their use. This technology leads to a more tailored user experience.

However, without these cookies, certain functionality like videos may become unavailable or you would be required to enter your login details every time you visit the platform as we would not be able to remember that you had logged in previously. Most web browsers can be set to disable the use of Cookies. However, if you disable Cookies, you may not be able to access functionality on our website correctly or at all. We never place Personally Identifiable Information in Cookies.

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## Blocking and disabling cookies and similar technologies

Wherever you're located you may also set your browser to block cookies and similar technologies, but this action may block our essential cookies and prevent our website/platform from functioning properly, and you may not be able to fully utilize all its features and services. You should also be aware that you may also lose some saved information (e.g., saved login details, site preferences) if you block cookies on your browser. Different browsers make different controls available to you. Disabling a cookie or category of cookie does not delete the cookie from your browser, you will need to do this yourself from within your browser, you should visit your browser's help menu for more information.

## Interaction on Social Media Channels

We use different Social Media channels (like Facebook, LinkedIn, etc.) for announcements. Please be cautious with providing your personal data – people could contact you with unsolicited contact requests. We are not responsible for any action after you shared your data publicly.

## Payment Details & Providers

In respect to any credit card or other payment processing details (e. g. PayPal) you have provided to our payment service providers (e. g. Omise), we commit that this confidential information will be stored in the most secure manner possible.

In Thailand we work together with [Omise Co., Ltd.](#) and we offer payments with [PayPal](#) globally. For more information, please go to their websites.

When you sign up for a subscription, we ask you to provide your name, contact information, and credit card information or other payment account information. When you submit your card information, we store the name and address of the cardholder, the expiry date and the last four digits of the credit card number. We do not store the actual credit card number. For quick processing of future payments, if you have given us your approval, we may store your credit card information or other payment information in an encrypted format in the secured servers of our Payment Gateway Service Providers.

If you have questions about our collaboration with payment service providers or if you want to pay for your subscription in another way, please contact our [Service Desk](#).

## Ordering history and Retention of your information

We will keep records of your order history. We need to keep this information even after you submitted a form to delete your account. We will hold your personal information for two more years after we notified you of the successful deletion of your account.

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When we no longer have a legitimate need to process your information, we will delete or anonymize your information from our active databases. We will also securely store the information and isolate it from further processing on backup discs until deletion is possible.

Sensor data which you could see on the OCTOBUS, and which were collected through sensors or imported data will be deleted at the same time when we delete the Business Partner account. There won't be any backup.

### Kids' Privacy

As mentioned in our Terms and Conditions of Service you must be of legal age to enter into a binding agreement to accept our terms. Therefore, there is no intention to provide our Services for anyone who is under legal ages. Consequently, there is no single section to describe kids' privacy.

### Changes To Our Privacy Policy

We may change our Service and policies, and we may need to make changes to this Privacy Policy so that they accurately reflect our Service and policies. Unless otherwise required by law, we will notify you on-screen with a notification on the platform and if we had to make substantial changes (like described above) – we will send you an email to your provided email address to inform you about them.

These measurements give you an opportunity to review them before they go into effect. Then, if you continue to use the Service, you will be bound by the updated Privacy Policy. If you do not want to agree to this or any updated Privacy Policy, you can delete your account.

### Third-Party Services

We may display, include, or make available third-party content (including data, information, applications, and other products services) or provide links to third-party websites or services ("Third- Party Services").

Our 3<sup>rd</sup> party Service Providers may provide us with services like hosting services, email providers, payment processors and fraud and security prevention organizations.

These providers support us to ensure a proper functionality of our own Services. We share only necessary information with them so that they can execute their services according to our contracts with them.

You acknowledge and agree that integrationWorks Asia shall not be responsible for any Third-Party Services, including their accuracy, completeness, timeliness, validity, copyright compliance, legality, decency, quality, or any other aspect thereof. integrationWorks Asia does not assume and shall not have any liability or responsibility to you or any other person or entity for any Third-Party Services.

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Third-Party Services and links thereto are provided solely as a convenience to you, and you access and use them entirely at your own risk and subject to such third parties' terms and conditions.

For now, we are add-free – but this can change in the future. If so, we will let you know in advance and which tools we will use to show you personalised advertisements.

### Data Access for others (except for Third-Party providers)

Due to providing you customer service on a top-level we implemented an OCTOBUS Service User into every Business Partner. If you have any issues with our platform, you can activate that service user for a specific time period, by enabling the user in the OCTOBUS business partner profile, so we can investigate the issue in no time in your BP directly. This service user can only be activated by you.

We only use this OCTOBUS Service User when you grant us permission to do it. Access to the credentials of this user is limited in our company to two persons only. This user is disabled by default.

Only a few very well selected employees have access to your provided services data and your contact data as well. This is needed to offer our services to you. All of them are committed to the highest standards of data security and discretion. Moreover, we ensure that all activities of our employees are logged with unique IDs and every action will be logged and audited. Dealing with data is our business, so everyone who works for us is highly sensitive about the topic of data security.

Currently, we don't work with any independent contractors – all our staff is hired directly at integrationWorks Asia or integrationWorks GmbH headquartered in Berlin, Germany.

As an admin you can invite users from inside your company or outside to collaborate with you within your Business Partner account. You can grant them full rights or only monitor platform rights and even here you can limit the access to specific Organisational Units, Dashboards, etc. – for more information please contact our [Service Desk](#) or check our knowledge base.

If you are from the European Economic Area and you believe that we store, use, or process your information on behalf of one of our customers, please contact the customer if you would like to access, rectify, erase, restrict or object to processing, or export your personal data. We will extend our support to our customer in responding to your request within a reasonable timeframe.

### Tracking Technologies

For now, we don't use any tracking technologies.

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## General Data Protection Regulation (GDPR)

The European Economic Area (EEA) provides certain rights to data subjects (including access, rectification, erasure, restriction of processing, data portability, and the right to object and to complain). The personal data entered on the platform are stored exclusively on servers in states of the European Union (EU) or the European Economic Area (EEA), if the Business Partner is located inside the mentioned zones.

This part of our Privacy Policy is especially interesting for all users located in the European Union which use our platform, but for all others as well (except for the place of data processing) as we decided to apply all requirements of the EU General Data Protection Regulation (GDPR) globally for all users.

As already mentioned, we take the protection of your data seriously and we have been constantly observing which (legal) changes we can take into consideration to apply to the highest standards. The EU General Data Protection Regulation (GDPR) sets the requirement to tell the user explicitly how companies like we process your data and which rights do you have. About many aspects we informed you already.

If you are in the European Economic Area and you believe that someone has entrusted your information to us for processing (for instance, your employer or a company whose services you use), you can request certain actions from us regarding your data. To exercise those data rights, please contact the person or company that entrusted the data to us and we will work with them on your request.

Most of our information collection and processing activities are typically based on (i) contractual necessity, (ii) one or more legitimate interests of integrationWorks Asia or a third party that are not overridden by your data protection interests, or (iii) your consent. Sometimes, we may be legally required to collect your information, or may need your personal information to protect your vital interests or those of another person.

Where we rely on your consent as the legal basis, you have the right to withdraw your consent at any time, but this will not affect any processing that has already taken place.

Where we rely on legitimate interests as the legal basis and those legitimate interests are not specified above, we will clearly explain to you what those legitimate interests are at the time that we collect your information.

### **And here are some more rights with respect to information we hold about you:**

- *Right to access:* You have the right to access (and obtain a copy of, if required) the categories of personal information that we hold about you, including the
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information's source, purpose and period of processing, and the persons to whom the information is shared

- *Right to rectification:* You have the right to update the information we hold about you or to rectify any inaccuracies. Based on the purpose for which we use your information, you can instruct us to add supplemental information about you in our database.
- *Right to erasure:* You have the right to request that we delete your personal information in certain circumstances, such as when it is no longer necessary for the purpose for which it was originally collected.
- *Right to restriction of processing:* You may also have the right to request to restrict the use of your information in certain circumstances, such as when you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.
- *Right to data portability:* You have the right to transfer your information to a third party in a structured, commonly used, and machine-readable format, in circumstances where the information is processed with your consent or by automated means.
- *Right to object:* You have the right to object to the use of your information in certain circumstances, such as the use of your personal information for direct marketing.
- *Rights in automated decisions:* If, in exceptional cases, we use automated individual decisions - including profiling - we are required by law to take precautions so that you can influence the decision (Art. 22 GDPR).
- *Right to complain:* You have the right to complain to the appropriate supervisory authority if you have any grievance against the way we collect, use, or share your information. This right may not be available to you if there is no supervisory authority dealing with data protection in your country. This [link](#) provides you more information about "Data protection authorities in Germany" and a list of data protection supervisory authorities.

## Contact Us

Don't hesitate to contact our [Service Desk](#) if you have any questions. We are happy to help you.

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