

HPass Global Privacy Policy

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HPASS GLOBAL LIMITED respects the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our mobile application or website (the HPass Global). Please read this Privacy Policy carefully. IF YOU DO NOT AGREE WITH THE TERMS OF THIS PRIVACY POLICY, PLEASE DO NOT ACCESS THE HPASS GLOBAL APPLICATION OR WEBSITE.

We reserve the right to make changes to this Privacy Policy at any time and for any reason. We will alert you about any changes by updating the “Last updated” date of this Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the HPass Global Mobile App or Website after the date such revised Privacy Policy is posted.

This Privacy Policy does not apply to the third-party online/mobile store from which you install the HPass Global Mobile App or Website or make payments, including any in-game virtual items, which may also collect and use data about you. We are not responsible for any of the data collected by any such third party.

This Privacy Policy was created using Termly’s Privacy Policy Generator.

COLLECTION OF YOUR INFORMATION

We may collect information about you in a variety of ways. The information we may collect via the HPass Global Mobile App or Website depends on the content and materials you use, and includes:

Personal Data

Demographic and other personally identifiable information (such as your name and email address) that you voluntarily give to us when choosing to participate in various activities related to the HPass Global Mobile App or Website, such as chat, posting messages in comment sections or in our forums, liking posts, sending feedback, and responding to surveys. If you choose to share data about yourself via your profile, online chat, or other interactive areas of the HPass Global Mobile App or Website, please be

advised that all data you disclose in these areas is public and your data will be accessible to anyone who accesses the HPass Global Mobile App or Website.

Derivative Data

Information our servers automatically collect when you access the HPass Global Mobile App or Website, such as your native actions that are integral to the HPass Global Mobile App or Website, including liking, re-blogging, or replying to a post, as well as other interactions with the HPass Global Mobile App or Website and other users via server log files.

Financial Data

Financial information, such as data related to your payment method (e.g. valid credit card number, card brand, expiration date) that we may collect when you purchase, order, return, exchange, or request information about our services from the HPass Global Mobile App or Website. We store only very limited, if any, financial information that we collect. Otherwise, all financial information is stored by our payment processors and you are encouraged to review their privacy policy and contact them directly for responses to your questions.

Facebook Permissions

The HPass Global Mobile App or Website may by default access your Facebook basic account information, including your name, email, gender, birthday, current city, and profile picture URL, as well as other information that you choose to make public. We may also request access to other permissions related to your account, such as friends, checkins, and likes, and you may choose to grant or deny us access to each individual permission. For more information regarding Facebook permissions, refer to the Facebook Permissions Reference page.

Data from Social Networks

User information from various social networking sites, including your name, your social network username, location, gender, birth date, email address, profile picture, and public data for contacts, if you connect your account to such social networks. This information may also include the contact information of anyone you invite to use and/or join the HPass Global Mobile App or Website.

Geo-Location Information

We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using the HPass Global Mobile App or Website, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Access

We may request access or permission to certain features from your mobile device, including your mobile device's front and back camera, gallery and other features that that your HPass Global App can connect to. If you wish to change our access or permissions, you may do so in your device's settings.

Mobile Device Data

Device information such as your mobile device ID number, model, and manufacturer, version of your operating system, phone number, country, location, and any other data you choose to provide.

Push Notifications

We may request to send you push notifications regarding your account or the HPass Global Mobile App or Website. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.

Third-Party Data

Information from third parties, such as personal information or network friends, if you connect your account to the third party and grant the HPass Global Mobile App or Website permission to access this information.

Data from Contests, Giveaways, and Surveys

Personal and other information you may provide when entering contests or giveaways and/or responding to surveys.

USE OF YOUR INFORMATION

Having accurate information about you permits us to provide you with a smooth, efficient, and customized experience. Specifically, we may use information collected about you via the HPass Global Mobile App or Website to:

Create and manage your account.

Email you regarding your account or order.

Prevent fraudulent transactions, monitor against theft, and protect against criminal activity.

Deliver targeted advertising, coupons, newsletters, and other information regarding promotions and the HPass Global Mobile App or Website to you.

Administer promotions, and contests.

Monitor and analyze usage and trends to improve your experience with the HPass Global Mobile App or Website.

Notify you of updates to the HPass Global Mobile App or Website.

Compile anonymous statistical data and analysis for use internally or with third parties.

Generate a personal profile about you to make future visits to the HPass Global Mobile App or Website more personalized.

Increase the efficiency and operation of the HPass Global Mobile App or Website.

Perform other business activities as needed.

Process payments and refunds.

Offer new products, services, mobile HPass Global Mobile App or Websites, and/or recommendations to you.

Resolve disputes and troubleshoot problems.

Assist law enforcement and respond to subpoena and manage pandemics such as Corona Virus Covid19

Respond to product and customer service requests.

Send you a newsletter.

Request feedback and contact you about your use of the HPass Global Mobile App or Website.

Enable user-to-user communications.

Fulfill and manage transactions related to the HPass Global Mobile App or Website.

Any other need as may be required from time to time.

DISCLOSURE OF YOUR INFORMATION

We may share information we have collected about you in certain situations. Your information may be disclosed as follows:

By Law or to Protect Rights

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any HPass Global applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

Third-Party Service Providers

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

Marketing Communications

With your consent, or with an opportunity for you to withdraw consent, we may share your information with third parties for marketing purposes, as permitted by law.

Interactions with Other Users

If you interact with other users of the HPass Global Mobile App or Website, those users may see your name, profile photo, and descriptions of your activity, including sending invitations to other users, chatting with other users, liking posts, following blogs.

Online Postings

When you post comments, contributions or other content to the HPass Global Mobile App or Websites, your posts may be viewed by all users and may be publicly distributed outside the HPass Global Mobile App or Website in perpetuity.

Third-Party Advertisers

We may use third-party advertising companies to serve ads when you visit the HPass Global Mobile App or Website. These companies may use information about your visits to the HPass Global Mobile App or Website and other websites that are contained in web cookies in order to provide advertisements about goods and services of interest to you.

Affiliates

We may share your information with our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.

Business Partners

We may share your information with our business partners to offer you certain products, services or promotions.

Offer Wall

The HPass Global Mobile App or Website may display a third-party-hosted “offer wall.” Such an offer wall allows third-party advertisers to offer virtual currency, gifts, or other items to users in return for acceptance and completion of an advertisement offer. Such an offer wall may appear in the HPass Global Mobile App or Website and be displayed to you based on certain data, such as your geographic area or demographic information. When you click on an offer wall, you will leave the HPass Global Mobile App or Website. A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account.

Social Media Contacts

If you connect to the HPass Global Mobile App or Website through a social network, your contacts on the social network will see your name, profile photo, and descriptions of your activity.

Other Third Parties

We may share your information with advertisers and investors for the purpose of conducting general business analysis. We may also share your information with such third parties for marketing purposes, as permitted by law.

Sale or Bankruptcy

If we reorganize or sell all or a portion of our assets, undergo a merger, or are acquired by another entity, we may transfer your information to the successor entity. If we go out of business or enter bankruptcy, your information would be an asset transferred or acquired by a third party. You acknowledge that such transfers may occur and that the transferee may decline honor commitments we made in this Privacy Policy.

We are not responsible for the actions of third parties with whom you share personal or sensitive data, and we have no authority to manage or control third-party solicitations. If you no longer wish to receive correspondence, emails or other communications from third parties, you are responsible for contacting the third party directly.

TRACKING TECHNOLOGIES

Cookies and Web Beacons

We may use cookies, web beacons, tracking pixels, and other tracking technologies on the HPass Global Mobile App or Website to help customize the HPass Global Mobile App or Website and improve your experience. When you access the HPass Global Mobile App or Website, your personal information is not collected through the use of tracking technology. Most browsers are set to accept cookies by default. You can remove or reject cookies, but be aware that such action could affect the availability and functionality of the HPass Global Mobile App or Website. You may not decline web beacons. However, they can be rendered ineffective by declining all cookies or by modifying your web browser's settings to notify you each time a cookie is tendered, permitting you to accept or decline cookies on an individual basis.

Internet-Based Advertising

Additionally, we may use third-party software to serve ads on the HPass Global Mobile App or Website, implement email marketing campaigns, and manage other interactive marketing initiatives. This third-party software may use cookies or similar tracking technology to help manage and optimize your online experience with us. For more information about opting-out of interest-based ads, visit the Network Advertising Initiative Opt-Out Tool or Digital Advertising Alliance Opt-Out Tool.

Website Analytics

We may also partner with selected third-party vendors, such as Google Analytics to allow tracking technologies and remarketing services on the HPass Global Mobile App or Website through the use of first party cookies and third-party cookies, to, among other things, analyze and track users' use of the HPass Global Mobile App or Website, determine the popularity of certain content, and better

understand online activity. By accessing the HPass Global Mobile App or Website, you consent to the collection and use of your information by these third-party vendors. You are encouraged to review their privacy policy and contact them directly for responses to your questions. We do not transfer personal information to these third-party vendors.

You should be aware that getting a new computer, installing a new browser, upgrading an existing browser, or erasing or otherwise altering your browser's cookies files may also clear certain opt-out cookies, plug-ins, or settings.

THIRD-PARTY WEBSITES

The HPass Global Mobile App or Website may contain links to third-party websites and HPass Global Mobile App or Websites of interest, including advertisements and external services, that are not affiliated with us. Once you have used these links to leave the HPass Global Mobile App or Website, any information you provide to these third parties is not covered by this Privacy Policy, and we cannot guarantee the safety and privacy of your information. Before visiting and providing any information to any third-party websites, you should inform yourself of the privacy policies and practices (if any) of the third party responsible for that website, and should take those steps necessary to, in your discretion, protect the privacy of your information. We are not responsible for the content or privacy and security practices and policies of any third parties, including other sites, services or HPass Global Mobile App or Websites that may be linked to or from the HPass Global Mobile App or Website.

SECURITY OF YOUR INFORMATION

We use administrative, technical, and physical security measures to help protect your personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee complete security if you provide personal information.

POLICY FOR CHILDREN

We do not knowingly solicit information from or market to children under the age of 13. If you become aware of any data we have collected from children under age 13, please contact us using the contact information provided below.

CONTROLS FOR DO-NOT-TRACK FEATURES

Most web browsers and some mobile operating systems, and our mobile HPass Global Mobile App or Websites include a Do-Not-Track (“DNT”) feature or setting you can activate to signal your privacy preference not to have data about your online browsing activities monitored and collected. No uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

OPTIONS REGARDING YOUR INFORMATION

Account Information

You may at any time review or change the information in your account or terminate your account by:

Contacting us using the contact information provided below

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

Emails and Communications

If you no longer wish to receive correspondence, emails, or other communications from us, you may opt-out by:

Noting your preferences at the time you register your account with the HPass Global Mobile App or Website

Contacting us using the contact information provided below

If you no longer wish to receive correspondence, emails, or other communications from third parties, you are responsible for contacting the third party directly.

KENYA DATA PROTECTION LAW

Kenya Data Protection Law, permits our users who are Kenyan residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a Kenyan resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in Kenya, and have a registered account with the HPass Global Mobile App or Website, you have the right to request removal of unwanted data that you publicly post on the HPass Global Mobile App or Website. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in Kenya. We will make sure the data is not publicly displayed on the HPass Global Mobile App or Website, but please be aware that the data may not be completely or comprehensively removed from our systems.

CONTACT US

If you have questions or comments about this Privacy Policy, please contact us at:

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