

MEIRO PTE. LTD. is a company incorporated in Singapore with its registered address at 53 Jalan Rumia, Singapore 278004 (Company Registration No. 201716898D) (“Meiro”) developing and operating Meiro software, providing analytical tools and related consulting services.

This Privacy Policy explains how we, Meiro, use personal and other data collected from you when you use this website and how it is secured.

## 1. INTERPRETATIONS

Personal data means any data about an individual who can be identified from that data or from a combination of that data and other information available. Not every type of data about an individual is considered as personal data regardless of conditions. Some types of data may be considered as personal data only in combination with other information or in certain conditions.

In terms of Personal Data Protection Act 2012 (PDPA) in Singapore, we are the organization carrying out activities involving personal data. In terms of General Data Protection Regulation (GDPR) in the EU, we are data controller, a legal person which determines the purpose and means of the processing of personal data.

We may use third-party service providers for collection, recording, holding and transmission of data (i.e. data processing). In terms of PDPA in Singapore, any of such third-party service provider is a data intermediary, an organization which processes personal data on behalf of another organization but does not include an employee of that other organization. In terms of GDPR in the EU, any such third-party service provider is a data processor, a natural or legal person which processes personal data on behalf of the data controller.

As a general policy, we use personal data for internal purposes only. We do not sell or rent information about you. We will not disclose personal data to third parties without your consent, except as explained in our Terms and Conditions for Events Attendance , Privacy Policy or [Cookie Notice](#).

Our website is not intended for children under 14 years of age. We do not knowingly collect personal information from children under 14. If you are under 14, please do not provide any information on our website.

## 2. TYPES OF DATA COLLECTED AND HOW WE USE IT

We collect data from you, through your interactions with us on our website and through your devices. You may provide some of this data directly, and we get some of it by collecting data about your interactions, use, and experience with our website or products. The data we may collect depends on the context of your interactions with us and choices you make, including your privacy settings and the products and features you use.

The data collected from you and the way how we use it may vary depending on the nature of your interaction with our website.

## **A. If you are a VISITOR**

### **What data we collect**

If you visit our website, the data we collect from you are as follows:

- IP address,
- cookies ID (identification) tags.

We may also collect information about your conduct on our website, such as links opened, products viewed, session duration, date and time of your visit to our website, information about your Internet browser or operating system etc. If you access our website from your mobile phone or a similar device, we can collect information about your mobile device as well (mobile phone details, model or type of your mobile phone etc.).

The data mentioned above may be considered as personal data under data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.)

IP address is a numerical label assigned to each device connected to the Internet Protocol for communication and required to show you websites, images, files and other information on the Internet. IP address typically can be used to find out the location of your device, generally down to the city level. In case of business IP address, it can be matched with a business name and street address.

Cookies are small text files that are sent from a website and stored on your computer or other device by your web browser when you visit a site. Cookies are created when you visit a website that uses cookies to recognize you, keep track of your interaction with the site, remember your preferences and make all site's functions available for you.

For more information about cookies used by our website please see our [Cookie Notice](#) which is part of this Privacy Policy.

Cookies, among other information, typically contain ID tags. A website that uses cookies stores a file with the same ID tags corresponding to cookies placed on your computer. When you visit the site again, your browser sends the relevant cookies from your computer to the website. Using cookies ID tags, a website, for instance, can recognize you as a returning visitor and apply your preferences automatically.

### **How we collect data**

IP address of your networked device is automatically captured whenever a connection is made over the Internet regardless of your consent.

This website uses cookies and requests your consent before placing any persistent cookies on your computer. You have the right to choose whether or not to accept cookies. You can accept all our website's cookies by clicking the respective button in the cookie consent banner that pops up in the bottom of the website's page you open or you can manage your cookies setting individually in the cookie consent banner. For more information about your rights to accept, manage or withdraw your consent for use of cookies on our website please see our [Cookie Notice](#).

### **How we store data**

IP addresses, cookies ID tags and other information about your interactions with our website are logged automatically and kept in the relevant log files.

## **For how long we store data**

We store (i) your IP address for the shortest time possible for our purposes, however not longer than 7 years; and (ii) cookies ID (identification) tags for a period of time stated in our [Cookie Notice](#). For more details, please check our [Cookie Notice](#).

## **How we use data**

We use IP addresses of our website's visitors for security reasons, particularly to identify malicious site visits and hacking attempts, to protect the website's data and traffic and make it safer for anyone visiting and using the website. Thus, we collect and use IP addresses of our website's visitors based on legitimate interest.

We will not disclose IP addresses of the website's visitors to any third party except where required to do so by law.

We use cookies ID tags and information about your activity on our websites to recognize you, keep track of your interaction with the site, remember your preferences and make all site's functions available for you. Since we may use third-party service providers to track and report websites traffic, those third-party service providers may place their own cookies on your computer and use the relevant cookies ID tags to measure and analyze information of your visits.

We collect and use cookies ID tags based on your acceptance of the website's cookies. For more information about how we use cookies, how you can accept, manage or withdraw your consent for use of cookies please check our [Cookie Notice](#).

## **B. If you are a SUBSCRIBER**

### **What data we collect**

If you not just visit our website, but also sign up for our newsletter and other Meiro marketing communication, in addition to the data mentioned above we collect from you:

- email address,

and, if you provide to us or where explicitly required, as the case may be, we may also collect from you:

- first name and last name (optional),
- phone number (optional),
- company you represent or work for or your job position (optional),
- city or country you come or operate from (optional),
- fax number (optional),
- age (optional),
- mobile phone number (optional).

Since an email address usually belongs to a particular person, it would likely be considered as personal data under data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.)

Not every type of the other data explicitly identifies an individual by itself, but in combination all of them are qualified as personal data under the data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.)

## **How we collect data**

We collect your email address and other data when you provide it to us voluntarily by filling in the subscription form on our website and clicking the respective subscribe button.

We collect your email address and other data provided to us on an optional basis automatically through the integration with [SmartEmailing](#), an email marketing service helping us to collect the subscribers' email addresses and other data and to send them our newsletters. SmartEmailing is our data intermediary in terms of PDPA in Singapore and data processor in terms of GDPR in EU.

## **How we store data**

We store your email address and other data provided to us on an optional basis within our account with SmartEmailing and in our internal database.

For the detailed information about SmartEmailing's privacy policy please check [SmartEmailing website](#).

## **For how long we store data**

As for our internal database, we store your email address and other data provided to us on an optional basis for an indefinite period of time unless you unsubscribe from our newsletters or notify our Data Protection Officer otherwise. Please note that you can revoke your consent anytime.

For the detailed information about the length of time for which your email address is stored by [SmartEmailing](#), please check [SmartEmailing website](#).

## **How we use data**

We use your email address and other data provided to us on an optional basis for sending you the newsletters related to our activities and events and other relevant marketing communication. We do not sell or trade email addresses or any other data of our subscribers to any third party, however we share such data with service providers or business partners who may help us to improve and target our marketing (particularly via Facebook, LinkedIn, Twitter and Google Ads) according to your preferences and offer you relevant products in which you may be interested. Such third parties are particularly Facebook Group companies (operating Facebook, Instagram and other social networks), Twitter, Inc. and Google Group companies. For detailed information about the above mentioned third parties' privacy policies please check the respective website of the third party.

We collect and use your email address and other data based on your consent to receive our newsletters and other relevant marketing communication expressed in the above-mentioned way.

If you subscribed to our newsletters and other relevant marketing communication, but do not want to receive them any longer, you can unsubscribe from them by using the "Unsubscribe" function on the newsletter.

## C. If you CONTACT us via contact forms

### What data we collect

If you not just visit our website, but also contact us via contact forms, e.g. ask for a free consultation, schedule a call, send us a message or request for demo, ask for receiving our marketing communication or ask us any question, in addition to the data mentioned above we collect from you:

- first name and last name,
- email address,
- company you represent or work for or job position (where required),
- your question/requirement.

Not every type of these data explicitly identifies an individual by itself, but in combination all of them are qualified as personal data under the data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.)

### How we collect data

If you contact us via contact forms available on our websites, we use your email address and other data for answering your questions, sending you a demo or our marketing communication (if requested), contacting you (if requested for a consultation) or helping you. We do not sell or trade email addresses or any other data to any third party.

We collect your data when you provide it to us voluntarily by filling in the contact form, accepting our Privacy Policy by ticking the relevant box and sending a message to us.

### How we store data

We store your data in an organized form in our internal database. Email addresses of individuals that contacted us are also stored within our account with [SmartEmailing](#), an email marketing service helping us to send you event-related information and our newsletters if required by you. [SmartEmailing](#) is our data intermediary in terms of PDPA in Singapore and data processor in terms of GDPR in EU.

For detailed information about [SmartEmailing's](#) privacy policy please check [SmartEmailing](#) website.

### For how long we store data

As for our internal database, we store your data for a period of 7 years.

For the detailed information about the length of time for which your data is stored by [SmartEmailing](#), please check [SmartEmailing website](#).

### How we use data

Your data are used for the purpose of communication with you and helping you with your requests. We do not disclose your data to any other third party which is not a data intermediary / data processor.

Your email address is also used for sending you your question-related messages, including, without limitation, in the future our newsletter or marketing communication if requested by you. We do not sell or trade email addresses or any other data of our user or subscribers to any third

party, however we share such data with service providers or business partners who may help us to improve and target our marketing (particularly via Facebook, LinkedIn, Twitter and Google Ads) according to your preferences and offer you relevant products in which you may be interested. Such third parties are particularly Facebook Group companies (operating Facebook, Instagram and other social networks), Twitter, Inc. and Google Group companies. For detailed information about the above mentioned third parties' privacy policies please check the respective website of the third party.

Here "Unsubscribe" option is available for you on the message, just as for any other newsletter or Meiro marketing communication subscriber.

We collect and use your data based on your consent given when you accept this Privacy Policy and/ or Meiro marketing communication. If you do not want us to store and use your data any longer, please check Clause 7 of this Privacy Policy to find out how to contact our Data Protection Officer with the relevant request.

#### **D. If you contact us via online chat**

##### **What data we collect**

If you not just visit our website, but also contact us via online chat available on our websites, in addition to the data mentioned above we may collect from you:

- text message you sent to us.

The content of the text message may be qualified as personal data under the data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.).

##### **How we collect data**

We collect your data when you provide it to us voluntarily by contacting us via online chat available on our websites, giving your consent to store your data by our website and sending the message to us. We do not disclose any other data to any third party which is not a data intermediary / data processor.

##### **How we store data**

If needed, we store your data in an organized form in our internal database. We manage answering your text messages via [tawk.to](https://tawk.to),, a service helping us to monitor and chat with the visitors on our website. [Tawk.to](https://tawk.to) is our data intermediary in terms of PDPA in Singapore and data processor in terms of GDPR in EU.

For detailed information about [tawk.to's](https://tawk.to) privacy policy please check [tawk.to](https://tawk.to) website.

##### **For how long we store data**

As for our internal database, we store your messages or data for a period of time necessary for answering your message.

For the detailed information about the length of time for which your data is stored by [tawk.to](https://tawk.to), please check [tawk.to](https://tawk.to) website.

## How we use data

Your data are used for the purpose of communication with you, helping you with your requests and also for our internal purposes as we may develop better services based on your comments. We do not disclose your data to any other third party which is not a data intermediary / data processor.

We collect and use your data based on your consent given when you fill in and send the relevant form on our website. If you do not want us to store and use your data any longer, please check Clause 7 of this Privacy Policy to find out how to contact our Data Protection Officer with the relevant request.

## E. If you REGISTER for one of our events

### What data we collect

If you register for attending one of our events, we collect from you:

- first name and last name,
- email address,

and, if you provide to us or where explicitly required, as the case may be, we may also collect from you:

- whether you have been to our events before,
- phone number (optional),
- company you represent or work for or your job position (optional),
- city or country you come or operate from (optional),
- age (optional),
- mobile phone number (optional).

Not every type of this data explicitly identifies an individual by itself, but in combination all of them are qualified as personal data under the data protection regulations being applied within countries and across regions (PDPA in Singapore, GDPR in EU, etc.)

### How we collect data

If you register for one of our events, we may collect your data via Zoom, a cloud platform for video, voice, content sharing, and chat. Zoom is our data intermediary in terms of PDPA in Singapore and data processor in terms of GDPR in EU.

We collect your data when you provide it to us voluntarily by filling in the registration form, accepting our Privacy Policy and [Terms and Conditions for Events Attendance](#) by ticking the relevant boxes and/or completing signing up on [Zoom](#) websites.

By completing the registration for our event on [Zoom](#) you also accept [Zoom's](#) Privacy Policy and Terms of Service. For more information please check [Zoom](#) website.

### How we store data

We store your data in an organized form in our internal database. Email addresses of individuals that registered for our events may be also stored within our account with SmartEmailing, an email marketing service helping us to send you event-related information and our newsletters. SmartEmailing is our data intermediary in terms of PDPA in Singapore and data processor in terms of GDPR in EU.

For detailed information about SmartEmailing's privacy policy please check [SmartEmailing](#) website.

### **For how long we store data**

As for our internal database, we store your data for a period when the event takes place and subsequently unless you unsubscribe from our newsletters or other Meiro marketing communication or other messages or notify our Data Protection Officer otherwise.

For the detailed information about the length of time for which your data is stored by SmartEmailing, please check [SmartEmailing](#) website. For the detailed information about the length of time for which your data is stored by Zoom, please check [Zoom](#) website.

### **How we use data**

Your first name, last name and email address are used for the purpose of facilitating your participation in the event you register for. These data may be shared with our event partners or third parties engaged by us to assist in the conduct of the event solely for the purpose of facilitating your participation in the event. We do not disclose your data to any other third party which is not a data intermediary / data processor.

Your email address is also used for sending you event-related messages, including, without limitation, changes and/or additions to the event you register for, and, in the future, our newsletter or marketing communication if requested by you. We do not sell or trade email addresses or any other data of our subscribers to any third party, however we share such data with service providers or business partners who may help us to improve and target our marketing (particularly via Facebook, LinkedIn, Twitter and Google Ads) according to your preferences and offer you relevant products in which you may be interested. Such third parties are particularly Facebook Group companies (operating Facebook, Instagram and other social networks), Twitter, Inc. and Google Group companies. For detailed information about the above mentioned third parties' privacy policies please check the respective website of the third party.

Here "Unsubscribe" option is available for you on the message, just as for any other newsletter or Meiro marketing communication subscriber.

We may use the rest of data collected from you during your registration for statistical analysis which allows us to track our progress in promoting diversity and inclusivity in tech.

For more detailed information please check Clause 5 "Privacy" of our [Terms and Conditions for Events Attendance](#).

We collect and use your data based on your consent given when you accept this Privacy Policy and/or Meiro marketing communication during your registration for one of our events. If you do not want us to store and use your data any longer, please check Clause 7 of this Privacy Policy to find out how to contact our Data Protection Officer with the relevant request.

## **3. PROTECTION OF PERSONAL DATA**

To safeguard your personal data from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks, we have implemented appropriate technical and organisational measures to secure all storage and transmission of personal data by us, and disclosing personal data both internally and to our authorized third parties only on a need-to-know basis to provide a level of security and confidentiality to your personal data. Implemented measures take into account the state of the art of the technology, the costs of its implementation, the nature of the data and the risk of the processing.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

#### 4. RETENTION OF PERSONAL DATA

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.

We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

#### 5. TRANSFER OF PERSONAL DATA

Your information, including personal data, may be transferred to and maintained on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Singapore and choose to provide information to us, please note that your data, including personal data, are transferred to Singapore or other countries where our affiliates are incorporated and exist (namely MEIRO EUROPE s.r.o. incorporated and having its seat in the Czech Republic, the European Union) and process it there with respect to the applicable data privacy laws. Your consent given by your submission of such information represents your agreement to that transfer.

We take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your personal data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

#### 6. RETENTION OF PERSONAL DATA

We would like to make sure you are fully aware of your data protection rights.

**The right to withdraw.** You have the right to recall the consent at any time. But please note that it does not affect the possibility to continue processing your personal data based on your consent, which was given prior to its recall.

**The right to access.** You have the right to request from us for copies of your personal data, under certain conditions. We may charge you a reasonable fee for this service.

**The right to rectification.** You have the right to request from us to correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.

**The right to erasure.** You have the right to request from us to erase your personal data, under certain conditions.

**The right to restrict processing.** You have the right to request from us to restrict the processing of your personal data, under certain conditions.

**The right to object to processing.** You have the right to object to our processing of your personal data, under certain conditions.

**The right to data portability.** You have the right to request from us to transfer the data that we have collected to another organization, or directly to you, under certain conditions.

**The right to information.** You have the right to be informed about a personal data breach in certain cases.

**The right to void automated decision-making.** You have the right not to be subject to a decision based solely on automated means in certain cases.

**Other rights.** You also have other rights set out in PDPA, GDPR and other relevant regulation regarding the protection of personal data.

If you would like to exercise any of these rights, please contact our Data Protection Officer.

## **7. HOW TO CONTACT OUR DATA PROTECTION OFFICER**

You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, using the following email address:

privacy@meiro.io

If you make a request, we have one month to respond to you.

## **8. HOW TO CONTACT THE APPROPRIATE AUTHORITY**

If you wish to report a complaint, please check [Personal Data Protection Commission](#) website where you can find the respective contact information.

## **9. PRIVACY POLICIES OF OTHER WEBSITES**

Our website contains links to other websites. This Privacy Policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

## **10. CHANGES TO THIS PRIVACY POLICY**

We may revise this Privacy Policy from time to time without any prior notice. You may determine if any of such revisions has taken place by referring to the date on which this Privacy Policy was last updated. Your continued use of our website, receiving of our newsletter, contacting us via contact form or online chat on our website and registering for our events constitutes your acknowledgement and acceptance of such changes.

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