

PRIVACY POLICY

May 18, 2021

1. WHAT INFORMATION TOVBAN WILL COLLECT

Information You Provide to TovBan

*When you use the services provided by the TovBan platform (“**Services**”), you may provide TovBan Co., Ltd (“**TovBan**”, “**we**” and “**us**”) with information about you. This may include your name and contact information, financial information to make or receive payment for the Services, or information to help us fill out tax forms. When you use the Services, we may also collect information related to your use of the Services and aggregate this with information about other users. This helps us improve our Services for you. You may also provide us with information about your contacts or friends if, for example, you’d like to add those contacts to a message room.*

- **Personal Information:** In the course of using the Services (whether as a customer of TovBan (“**Client**”) or freelancer using the Services (“**Freelancer**”) or agency of TovBan (“**Agency**”)), we may require or otherwise collect information that identifies you as a specific individual, which can be used to contact or identify you (“**Personal Information**”). Examples of Personal Information include your name, email address, company address, billing address, and phone number.
- **Payment Information:** If you use the Services to make or receive payments, we will also collect certain payment information, such as credit card details or other financial account information, and billing address.
- **Identity Verification:** We may collect Personal Information, such as your date of birth or taxpayer identification number, to validate your identity or as may be required by Cambodian laws, such as to complete tax filings. We may request documents to verify this information, such as a copy of your government-issued identification or photo or a billing statement.
- **General Audience Service:** The Services are for the general audience and intended for users aged 18 and older. We do not knowingly collect Personal Information from anyone younger than the age of 18 (“**Minor**” and “**Minors**”). If we become aware that a Minor has provided us with his/her Personal Information, we will use commercially reasonable efforts to delete such information from our files. If you are the parent or legal guardian of a Minor and believe that TovBan has collected his/her Personal Information, please contact us at: info@tovban.com
- **Non-Personally Identifiable Information/Usernames:** We also may collect other information, such as zip codes, demographic data, information regarding your use of the Services, and general project-related data (“**Non-Personally Identifiable Information**”). We may aggregate information collected from TovBan registered and non-registered users (“**TovBan Users**”). In some cases, we may render Personal Information (generally, email address) into a form of Non-Personally Identifiable Information (“**Hashed Information**”). This is typically accomplished using a mathematical process (commonly known as a hash function) to convert information into a code. The code does not identify you directly, but it may be used to connect your activity and interests.
- **Combination of Personal and Non-Personally Identifiable Information:** Certain Non-Personally Identifiable Information would be considered as a part of your Personal Information if it were combined with other identifiers in a way that enables you to be identified (for example, combining information with your name). But the same pieces of information are considered Non-Personally Identifiable Information when they are taken alone or combined only with other non-personally identifiable information (for example, your viewing preferences). We may combine your Personal Information with Non-Personally Identifiable Information, but TovBan will treat the combined information as Personal Information.

- **Collection of Third Party Personal Information:** We collect the following Personal Information from you about your contacts or friends: first name, last name, and email address when you provide it to us for the purpose of adding your contacts to a message room.

You do not have a statutory obligation to provide us with any information, but you may have a contractual obligation to do so, and if we do not receive certain information from you, then we will not be able to provide our Services to you. If you have any questions regarding whether provision of information is mandatory and the consequences for withholding such information, please contact us using the contact information below.

Information Received from Third Parties

Third parties may also give us information about you. If we combine the information provided by such third parties with information about you collected through the Services, we will still treat that combined information as Personal Information or, as the case may be, Non-Personally Identifiable Information.

We also may receive information about you from third parties. For example, we may supplement the information we collect with outside records or third parties may provide information in connection with a co-marketing agreement or at your request (such as if you choose to sign in with a third-party service). If we combine the information we receive from others with information we collect through the Services, we will treat the combined information as *Personal Information or, as the case may be, Non-Personally Identifiable Information.*

Information Collected Automatically

Like other online companies, we receive technical information when you use our Services. We use these technologies to analyze how people use the Services, to improve how the website and platform of TovBan (“Site”) functions, to save your log-in information for future sessions, and to serve you with advertisements that may interest you.

We and our third party service providers, including analytics and third party content providers, may automatically collect certain information from you whenever you access or interact with the Services. This information may include, among other information, the browser and operating system you are using, the universal resource locator (“URL”) or advertisement that referred you to the Services, the search terms you entered into a search engine that led you to the Services, areas within the Services that you visited, which links you clicked on, which pages or contents you viewed and for how long, other similar information and statistics about your interactions, such as content response times, download errors and length of visits to certain pages and other information commonly shared when browsers communicate with websites. We may combine this automatically collected log information with other information we collect about you. We do this to improve the Services we offer you, and to improve marketing, analytics, and functionality of the Site.

The information we collect also includes the Internet Protocol (“IP”) address or other unique device identifier (“**Device Identifier**”) for any device (computer, mobile phone, tablet, etc.) used to access the Services. A Device Identifier is a number that is automatically assigned or connected to the device you use to access the Services, and our servers identify your device by its Device Identifier. Some mobile service providers may also provide us or our third party service providers with information regarding the physical location of the device used to access the Services.

TovBan and its partners use cookies or similar technologies to analyze trends, administer the website, track users’ movement around the website, the desktop app, and the mobile app, and to gather demographic information about our user base as a whole. The technology used to collect information automatically from TovBan Users may include the following:

- **Cookies:** Like many websites, we and our marketing partners, affiliates, analytics, and service providers use “cookies” to collect information. A cookie is a small data file that we transfer to your computer’s hard disk for record-keeping purposes. We use both persistent cookies that remain on your computer or similar device (such as to save your registration ID and login password for future logins to the Services and to track your compliance with the TovBan Terms of Service) and session ID cookies, which expire at the end of your browser session (for example, to enable certain features of the Services, to better understand how TovBan Users interact with the Services and to monitor aggregate usage by TovBan Users and web traffic routing on the Services). You can control the use of cookies at the individual browser level, but if you choose to disable cookies, it may limit your use of certain features or functionality of the Services.
- **Web Beacons:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as “web beacons” and/or “tracking tags” to help us keep track of what content on our Services is effective and to serve relevant advertising to you. Web beacons are small graphics with a unique identifier that may be invisible to you, and which are used to track the online activity of Internet users. Web beacons are embedded in the web pages you review or email messages you receive. Web beacons or similar technologies may be used for a number of purposes, including, without limitation, to count visitors to our Services, to monitor how TovBan Users navigate the Services, to count how many emails that were sent were actually opened, or to count how many particular articles or links were actually viewed.
- **Embedded Scripts:** We and our marketing partners, affiliates, analytics, and service providers may also employ software technology known as an Embedded Script. An Embedded Script is programming code that is designed to collect information about your interactions with the Services, such as the links you click on. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Services.

In addition, we and our marketing partners, affiliates, analytics, and service providers may use a variety of other technologies (such as tags) that collect similar information for security and fraud detection purposes and we may use third parties to perform these services on our behalf.

2. WHAT TOVBAN WILL DO WITH COLLECTED INFORMATION

We collect information primarily to:

- 1) identify you;
- 2) provide better service; and
- 3) conduct legal/investigative compliance.

We will use your information to contact you. You have the option to opt out of us contacting you, including but not limited to marketing emails and promotional materials. However, you may not be able to fully utilize our platform to its potential.

By signing up with TovBan and/or using the Services, you authorize us to use, collect, store, process and manage your Personal Information, and to share your Personal Information with third-party partners for the purposes of providing better services. We will not sell your information, and we will only share your Personal Information if we expressly believe that the sharing of the Personal Information falls in the scope of your interests. You have the right to refuse this third-party sharing of Personal Information, and we will comply.

As you use your services, you may share information such as files and audio messages with other TovBan Users on the TovBan platform. This information remains strictly confidential, and with the exception of legal/investigative requirements, we will not divulge this information to any third-party entity.

We will only share your information to the extent required by the Cambodian laws or competent authorities if the disclosure of your Personal Information is required.

The bottom line is we will treat your information and privacy with the utmost respect.

International Data Transfers

We rely on marketing partners, affiliates, analytics, and service providers, who will need your Personal Information in order to enhance our Services to you. Our marketing partners, affiliates, analytics, and service providers are located in different countries and required to comply with different regulatory requirements with respect to data protection.

By signing up with TovBan and/or using the Services, you authorize us to transfer your Personal Information to marketing partners, affiliates, analytics, and service providers for using, collecting, storing, processing and managing your Personal Information in different countries. Under these circumstances, your Personal Information is subject to the regulatory requirements of these countries.

3. WHAT YOU CAN DO WITH YOUR PERSONAL INFORMATION

If you would like to undertake the following activities in relation to your Personal Information, you may do so by editing your TovBan account on the platform and/or contacting us]:

- to access or review your Personal Information and request for information on how TovBan processes your Personal Information;
- to correct, amend or update your Personal Information;
- to delete your Personal Information;
- to request that your Personal Information be used in specific circumstances; and/or
- to withdraw your authorization from the use of your Personal Information.

All your Personal Information is treated in the same manner regardless of its sensitivity. We do not knowingly or intentionally use, collect, store, process and manage your Personal Information that is sensitive to you, and we recommend that you do not submit your sensitive information to us.

4. HOW WE PROTECT AND KEEP YOUR PERSONAL INFORMATION

Security Protection

We use commercially viable and reasonable measures to protect your Personal Information from unauthorized access, destruction, loss, alteration or misuse of your Personal Information. We undertake appropriate organizational, technical and administrative measures to maintain a reasonable level of protection of your Personal Information by:

- sharing and giving access of your Personal Information strictly for the purpose of providing and enhancing the Services to you;
- applying appropriate security protection to the server and the premises storing your Personal Information;
- checking the identify of the person requesting for access to your Personal Information;
- transferring your information via data encryption system; and

Retention of Personal Information

We maintain your Personal Information while we are providing the Services to you. We will continue to retain your Personal Information after you have terminated to use our Services for the following purposes:

- to comply with the regulatory requirements including for the purpose of monitoring, detecting and preventing fraud;
- to comply tax obligations, financial reporting obligations, and record retention requirements;
- to settle outstanding payment; and/or
- to comply with our contractual commitments or legitimate interests for conducting our Services.

5. UPDATE TO OUR PRIVACY POLICY

Our Privacy Policy may be amended from time to time to adjust to the additional Services, changes in regulatory requirements and our practices towards Personal Information. We may provide you with

notification with our updated Privacy Policy through the contact that you have provided to us and the disclosure of the updated Privacy Policy on this website.

The updated Privacy Policy becomes effective on the date on which it is posted on this website. The date of the last revision of this Privacy Policy can be found at the top of this page.