



BOLDLY Privacy Policy

Lantern Rouge Online Ltd.; Lanterne Rouge Online Pte. Ltd.; Lanterne Rouge Holdings Pte. Ltd.; and Lanterne Rouge Technologies Pte. Ltd., trading under the registered trademarks Ka-BLOOM Group and BOLDLY (“we”, “us”, or “our”), are committed to protecting and respecting your privacy and personal data. This privacy policy (together with any other documents referred to herein) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us and the choices you have regarding this information. Please read the following carefully to understand our practices regarding your personal data and how we will treat it. This privacy policy applies to the information we collect when you access or use our products, services and/or technology platforms (including without limitation, our websites, mobile applications, and other Ka-BLOOM Group or BOLDLY controlled property (collectively the “Sites”)) or other services that link to this privacy policy (collectively the “Services”). It also applies when you apply to work with us, contact us or otherwise interact with us through our Sites.

If you are under 18 years of age, please do not send any personal data about yourself to us.

1. Information collection

We collect personal information from individuals we interact with in the course of providing our Sites and Services, dealing with suppliers, employees and potential employees and as is necessary for the operation of our business and provision of our Services.

In order to provide our Services the main types of information we collect are:

- Information that you provide when registering to use our Sites or subscribing to our Services, alerts, newsletters, or to attend our events, or when applying to work with us. This may include data such as name, postal address, telephone number, email address, other forms of electronic communication, details from your LinkedIn profile or background information.
- Login credentials for any of our Sites.
- Information you provide in connection with the delivery of our Services including responses to questionnaires, activities, participation in any interactive features of our Sites or Services including video or audio calls and other information generated in connection with coaching sessions.
- If you contact us, for instance to report a problem with our Site or Services, we may keep a record of that correspondence.
- Information you provide in response to any promotions or research surveys that we send (subject to your agreement to be contacted for such purposes).

We also automatically collect information when you use our Services or Sites, including:

- Data related to your use of and visit to the Sites such as time of login, how you navigated to our Sites, browsing information, what you viewed, clicked and searched for.
- Data related to the type of device you used to access our Services including web browser used and browsing information collected through cookies (see more on this further below), web beacons, pixels and other similar tracking technologies, IP address, device identifiers, operating system and mobile network information.

The information we collect automatically will be associated with the personal data you provide.

Our Sites are not designed to respond to “do not track” signals from browsers and we do not track or collect information about your online activities over time and across third-party web sites.

2. Data Retention

We only retain personal data for so long as it is necessary for the purpose for which it was collected, to meet legal or regulatory obligations or for other legitimate business purposes. Data may be archived as long as the purpose for which the data was used still exists.

3. Use of Information

We only use and process personal data for legitimate business purposes. The purposes for which information may be used include:

- To conduct our business, provide and improve our Sites and Services.
- To fix errors, monitor usage and improve performance and reliability of our Sites and Services. We may use third party service providers to assist us with this and their services are not intended to identify one user specifically.
- To personalise and enhance the content we think is relevant for you and provide alerts, newsletters, surveys, research or other information that you have requested.
- To communicate and stay in touch with our clients, suppliers and business contacts (such as to notify of technical issues, notify of offers, promotions, events, respond to queries and provide other relevant information and insights we think are relevant for you).
- For Employees and Coaches to assess qualifications, verify information and references, provide appropriate compensation and contact potential Employees on opportunities of interest.
- To fulfil our and our affiliates' legal obligations and contractual obligations such as those entered into with Clients and Citizens.
- Any other purpose for which the information is collected or which is incidental to the above.

Our Sites use Google Analytics, a web traffic analysis service provided by Google Inc. ("Google"). Please refer to <http://www.google.com/policies/privacy/partners> to find out more about how Google uses data when you use our Sites and how to control the information sent to Google. You can prevent Google's collection and processing of data through adjustment to the Google Ads Settings page or downloading and installing their browser plug-in (<https://tools.google.com/dlpage/gaoptout>).

4. Marketing Practices

We use personal data to send promotional communications. Where required by law, we will obtain consent prior to sending such communications. If you no longer wish to receive these communications you can unsubscribe by following the link or contacting us as set out below in this Privacy Policy. Please note we will still send communications about your account or any ongoing Services.

5. Disclosure of Your Information and International Transfers

In order to deliver our Services and Sites we may disclose personal data to:

- Our Employees, Agents, Coaches, Consultants, Advisers, Auditors, Contractors and service providers in connection with our operations or Services (wherever they may be located throughout the world).
- Our overseas offices, affiliates, business partners and counterparts (wherever they may be located throughout the world).
- Financial institutions, professional advisers, purchasers or business partners in connection with any financing, sale, reorganisation, merger or acquisition of our business (wherever they may be located throughout the world).

Where the Services are purchased for you by an Employer or sponsoring entity we may share information relating to the use of the Sites or Services such as to confirm your participation in a program, number of sessions attended, types of activities or programs selected. We will not share detail of the content discussed or produced during your use of the Services without your prior consent to do so except as outlined in this Privacy Policy.

We and our third party service providers may hold your data on servers located throughout the world. By using the Sites or Services you voluntarily consent to trans-border transfers of and hosting of such



BOLDLY Privacy Policy

information and acknowledge that the location of recipients of your personal data and/or third party service providers may include countries where local laws grant fewer rights than you have in your own country.

We use reasonable endeavours to protect the confidentiality of personal data shared with any of the abovementioned recipients to ensure it is treated in a manner consistent with this Privacy Policy. We have also implemented a generally accepted standard of internal security measures and processes to protect the confidentiality, availability, misuse, loss, alteration and integrity of your personal data. Despite these precautions we cannot guarantee that unauthorized persons will not obtain access to your personal data. Accordingly,

We may also disclose personal data:

- To persons under a duty of confidentiality to us.
- Where we believe it is necessary to do so in order to protect the rights, property or safety of you or others or in connection with an investigation of suspected or actual illegal activity.
- Where required under applicable laws and regulations or legal processes.
- To enforce our terms and conditions of use of our Services or Sites.
- Where we believe it is necessary for us to do so to protect your interests.

We do not sell or otherwise disclose the personal information we collect, except as described in this Privacy Policy.

6. Cookies

Our website uses cookies to distinguish you from other users of our website. Cookies are a small file of letters and numbers that are stored on your browser or hard drive to uniquely identify the browser or to store information or settings on the user's device. This helps us provide you with a good experience when you browse our Sites and also allows us to improve our Sites. By continuing to browse our Sites, you are agreeing to our use of cookies. It is possible to disable or restrict cookies or adjust their settings through your browser however please note this may impact your ability to use some of the features of our Sites.

We use **strictly necessary cookies**. These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, including the use of e-billing services.

Please note that third parties (for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

7. Third Party Websites and Social Networking

Our website may contain links to other sites and you may be able to sign into your account with us through your social network accounts such as, but not limited to Twitter, LinkedIn and Facebook ("**Linked Sites**"). We are not responsible for the privacy policies or practices of such other Linked Sites. Please note that this Privacy Policy does not apply to the use of third-party sites, services or applications that you may access through our Sites. We encourage our users to be aware when leaving our website to read the privacy policies or statements of each Linked Site that collects your personal data. You are encouraged to review the privacy policies of such third party vendors to understand their privacy practices and treatment of your personal data.

By associating your social network account with your account with us, you give us permission to access information that you have made available in your public profile on these social network accounts. The information you make available through this will depend on the settings and selections you have made in

BOLDLY Privacy Policy

your respective social network accounts. We use the information we receive through your social network accounts pursuant to the social network's terms of use and this Privacy Policy. If you would like to disconnect a social media account from us, please refer to the settings of that social network account.

8. Children

The Sites and Services are not designed for or directed at persons under 18 years of age. We request that persons under 18 years of age do not provide us with their personal data and we do not intentionally collect or maintain personal data for persons under 18 years of age.

9. Consent and Changes to our Privacy Policy

By using our Sites or Services, you consent to the collection, use and storage of your personal data as set forth in this Privacy Policy. We may make changes to this Privacy Policy from time to time. Any changes we may make to our Privacy Policy in the future will be posted on this page and the revised date of the Privacy Policy will indicate the date on which notice of the changes has been given. We may also choose to provide additional notice through email or a statement on our website. Your continued use of our Services or Sites constitutes your agreement to this Privacy Policy and any updates.

10. Your Rights

To the extent provided by the laws of your jurisdiction, you may request we check, correct, amend, delete, restrict or transfer your data, provide more information on our privacy practices and the type of data held or object to certain uses of your data such as the use of personal data for marketing or research and statistical purposes. You may also withdraw consent that you have previously provided relating to our handling of your personal information. Unless there is a legal or legitimate reason not to, we will apply your preferences going forward.

You may exercise any of your rights by notifying us. Some of these requests can be made through your account. Alternately, please send such requests, questions or complaints to:

Name: Lanterne Rouge Holdings
Address: 141 Middle Road #05-06 GSM Building Singapore 188976
Tel: +65 6834 3323
Email: Alexandra.Lamb@kabloomgroup.com

In accordance with the laws of certain jurisdictions, we have the right to and may charge a minimum fee for processing any data access request.

If you are a European Resident and have a concern with our personal data practices that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.