



Privacy Policy

Last modified on 4 June 2020

Our Commitment to You At ViSenze, we are 100% committed to protecting the privacy and security of the businesses we work with to provide our services to. We respect the privacy and confidentiality of any personal data that we process when we provide our services.

Purpose of this Privacy Policy

We have two types of Privacy Policies:

- **GENERAL Privacy Policy:** This explains how we use and disclose personal data that we collect from individuals who visit our website and from individuals who engage with us in both online and offline business activities.
- **SERVICES Privacy Policy:** We provide services to other businesses that enables them in turn to provide services to their individual customers. We provide visual search and recognition services, annotation services, tagging services and other services that enable an individual to find items that they may want to purchase, and we work with images either in photos or videos.

We respect the privacy and confidentiality of any personal data that we process when we provide our services. With one exception, the way we do so is set out in this Privacy Policy. The exception occurs when our services are provided through an app on a mobile phone that was loaded onto it by the mobile phone manufacturer. In that case, please refer to the Privacy Policy in the app on your mobile phone.

Personal Data Compliance

Our home is Singapore and we have implemented policies and practices about the way we process personal data in compliance with the Personal Data Protection Act (PDPA) of Singapore. Being a global business, we have also implemented policies and practices required by the General Data Protection Regulation (GDPR).

Updates to this Privacy Policy

As there may be changes to privacy laws and regulations, we reserve the right to update this Privacy Policy at any time.

Past Policy Updates

We are transparent about the changes we make to our Privacy Policy. For past Privacy Policy updates:

• [October 2018](#)

GENERAL Privacy Policy

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1. SOME TECHNICAL TERMS FOR YOUR UNDERSTANDING

What is 'Personal Data'?

'Personal Data' means any data (in Singapore, whether true or not), about or relating to an individual who can be identified from that data (including when it is put together with other information to which we have or are likely to have access) or is otherwise an identified or identifiable individual.

Examples of Personal Data

Your name, plus information such as your phone number, physical or email address, your employer's name and your job title, is personal data. Your image in a photo or video may be personal data. Your IP address may also be personal data.

Who or what is a 'data subject'?

An individual who can be identified from personal data is called a 'data subject'.

2. WHAT KIND OF DATA DO WE COLLECT?

We may collect the following types of personal data about or relating to you:

- contact information that enables us to communicate with you and send messages to you – such as your name, company name, job title, work email address, personal email address, work phone number, home phone number and mobile phone number – including contact information that you choose to make available publicly, such as information in your LinkedIn profile or in other business-related social media posts

- information about our business relationship with you and/or your company and that helps us to do business with you and/or with your company and information that helps us tailor our services for you and/or your company
- payment information, including payment card details if you choose to use a payment card to pay for the services you and/or your company acquire from us
- transaction information about how you interact with us, including enquiries, account information and information about how you use our website and/or any dashboard that we make available to your company and how you and/or your company use our services
- send you marketing and communications materials electronically or offline

3. HOW WE COLLECT PERSONAL DATA

We generally collect personal data directly from you.

- We will ask you for it (including contact information and relationship information) when you interact with us and/or when you have been referred to us as an individual who may be interested in knowing more about the services we provide, including:
- when our representative meets you at a trade show or other industry event or you are otherwise introduced to us or we contact you through contact information that you choose to make available publicly
- when you complete and submit to us personal data such as your name and contact information in an online form on our website (such as 'Request for Free Trial' and 'Contact Us') or otherwise make enquiries about our services and pricing
- when we are working with you in the course of establishing a business relationship with you and/or your company
- when we are providing our services to you and/or your company, including when we provide you and/or your company with access to a dashboard and we track your usage of that dashboard to understand your behaviour and how, therefore, we can improve our services for you and/or your company and/or
- if you visit our website, we use cookies and other technological tools to collect information about your computer or other device that you use for that purpose and your use of our website. We treat this information as personal data when it is associated

with your name and contact information and we are therefore able to identify you. Otherwise, we do not treat the information provided to us by cookies and other technological tools as personal data. For more information about cookies and other technologies, please refer to our [Cookies Policy](#).

4. HOW DO WE USE THIS INFORMATION?

We use personal data about or relating to you:

- to fulfil your and/or your company's requests for services and for related activities, such as service delivery, customer service, account / relationship management, support and training
- to send you marketing communications, including offers targeted based on your interests, business characteristics and location
- to discuss and invite you to join ViSenze in a strategic business partnership, alliance, sponsorships and other work collaborations
- to invite you to promotional and speaking events that we think may be of interest to you
- to determine if you and/or your company are eligible for certain services or offers
- to enable you to interact with us on behalf of your company, such as by providing you with access to a dashboard maintained by us that is relevant to the business relationship we have with your company
- to provide you and/or your company with additional information that we think may be of interest to you and/or your company, such as news about us, announcements made by us and technical information such as technical service bulletins and product updates
- to manage our everyday business needs and interactions with you and/or your company, including delivering our services to you and/or your company, processing payments, managing our financial accounting, carrying out product research and development, administering our website, analysing your and/or your company's use of our services, preventing fraud and maintaining the security of our systems and processes, reporting and legal compliance and managing our business continuity

5. HOW IS THIS INFORMATION SHARED?

Service providers

We use a variety of third-party service providers to help us provide our services to our customers. They may be located inside or outside of the European Economic Area (EEA). In particular, they may be located in Europe, India, Asia Pacific, and North America. We use them to help us:

- to perform product development, maintenance and debugging
- to provide customer service, advertising or payments services
- to host our IT systems

These service providers have limited access to your personal data to perform these tasks on our behalf and they are contractually bound to protect the personal data and only use it in accordance with our instructions. We share your personal data with them only so that we are able to ensure the adequate performance of our obligations to you.

Our related companies

To enable us to provide our services, we may share your personal data with companies that are in our corporate group (because they are related by common ownership or control).

Business transfers and other related transactions

If we undertake or are involved in any fundraising through investment in us or in any merger, acquisition, reorganisation, sale of assets, bankruptcy or insolvency event, we may sell, transfer or share some or all of our assets, including your personal data in connection with such a transaction or in contemplation of such a transaction (for example, in due diligence).

If this happens, we will if it is reasonably commercially possible notify you before your personal data is transferred and becomes subject to the privacy policy of the transferee.

6. WHERE WE STORE PERSONAL DATA

We have five data centres globally at present. They are in Ireland, Singapore, Japan, China and the US. We may add more data centres in the future.

Website forms; other marketing uses of personal data

If you complete an online form on our website (such as 'Request for Free Trial' and 'Contact Us' or other such marketing reasons that would require your voluntary sharing or contact information) or if we otherwise process personal data about you because we think you and/or your company may be interested in using our services we store the personal data we receive from you or otherwise collect about you on our server in Singapore and as we use the services of HubSpot, Inc., on their server in the US.

Use of a dashboard and/or our annotation system

If you choose to use a dashboard that we make available to our customers and/or business partners (such as our Enterprise Dashboard and our Sales Performance Dashboard), we store the personal data we receive from you or otherwise collect about you from such customer and/or business partner:

- on our server in Singapore and
- as we use the services of OKTA, Inc., on their server in the US

7. HOW LONG DO WE STORE DATA FOR?

If there is a contract between us and you / your company:

If you and/or your company have a contract with us (for example, a contract under which we provide services to you/your company) we generally retain your personal data for as long as is necessary for the performance of that contract and to comply with our legal obligations.

If you have been nominated by your company to have access to a dashboard maintained by us that is relevant to the business relationship we have with your company, we retain your personal data only until the earlier of:

- your company telling us that you no longer need or shall have access to that dashboard (for example, because you have left the company)
- your company closing its account with us

If we have been in contact with you and we do not enter into a contract with you / your company:

If we have been in active contact with you but you / your company have not entered into a contract with us we generally retain your personal data for no longer than two years after such contact ceases (for your and our convenience if you contact us again during that two year period).

If we have not been in active contact with you (for example, where you have completed the 'Request for Free Trial' or 'Contact Us' form on our website, we have responded to your request and we have not heard back from you) we generally retain your personal data for no longer than six months after you submit it to us.

8. YOUR RIGHTS

You can request us to erase your personal data at any time. However, in any such case we may retain some of your personal data as necessary for our legitimate business interests, including our corporate record-keeping. We may also retain and use your personal data to the extent necessary or desirable to enable us to comply with our legal obligations. For example, we may retain some of your personal data for tax, legal and auditing purposes.

Your right to access personal data about or relating to you

You have the right to obtain confirmation from us as to whether or not we are processing personal data concerning you. Where we are doing so, you have the right to obtain a copy of the personal data undergoing processing from us and:

- information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed (in particular recipients in third countries or international organisations), where possible, the envisaged period for which we will store the personal data or, if not possible, the criteria we will use to determine that period and
- any available information as to the source from which we collected the personal data, including whether it came from publicly available sources

Your right to rectification of personal data concerning you

You have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you.

Your right to erasure – the ‘right to be forgotten’

You have the right to obtain from us the erasure of personal data concerning you without undue delay if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- you object to us processing the personal data on the grounds of our legitimate interests and we do not have overriding legitimate grounds for the processing
- the personal data have been unlawfully processed or
- the personal data have to be erased for compliance with an obligation under European Union or Member State law to which we are subject

Your right to restriction of processing

You have the right to obtain from us restriction of processing of personal data concerning you where one of the following applies:

- you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims
- you have objected to processing, pending the verification whether our legitimate grounds of processing override your legitimate interests

Your right to object to processing

You are entitled to request us not to process your personal data for certain specific purposes (including profiling) where such processing is based on our legitimate interest in processing it. If you object to such processing we will no longer process your personal data for these purposes



unless we can demonstrate compelling legitimate grounds for such processing or such processing is required in order for us to establish, exercise or defence legal claims.

Where we process your personal data for direct marketing purposes, you may at any time ask us to cease processing your personal data for such purposes. You can do this by choosing 'unsubscribe' in an email we have sent to you or by contacting us.

Your right to data portability

You are entitled to request copies of personal data that you have provided to us in a structured, commonly-used and machine-readable format and/or to request us to transmit such personal data to another service provider if it is technically feasible for us to do so.

Your right to raise issues

If you have any complaints about the way or ways in which we have or have not processed your personal data or you believe that we have not complied with your rights as a data subject, please do [contact us](#).

However, if you believe that we have not complied with your rights as a data subject, you can lodge a complaint to the supervisory authority in the country in which you live.

Your right to know about any automated decision-making

We do not use any personal data about you for automated decision-making, including profiling. Where we return visual matches to [query images](#), to the extent that our visual search and recognition service includes automated decision-making it concerns the item in the query image and not any personal data about you.

9. CONTACT US

We are ViSenze Pte. Ltd ('**ViSenze**', '**we**', '**us**', '**our**', etc.), a company incorporated in Singapore with registration number 201221002E. Our registered office and place of business is at 67 Ayer Rajah Crescent #07-11 Singapore 139950.

We are always happy to provide additional information about how we process personal data and to answer any

questions about our processing activities. You can contact us by writing to us at our address above or by emailing dataprotection@visenze.com.

General Data Protection Regulation (GDPR) – European Representative

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), Visenze has appointed European Data Protection Office (EDPO) as its GDPR representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR by:

- using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
- writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

If you are our employee or a job applicant, please contact our Human Resources Department or email careers@visenze.com and we will be happy to provide you with information about how we process personal data in that context.

UK General Data Protection Regulation (GDPR) – UK Representative

Pursuant to the UK GDPR, Visenze has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO UK's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

10. COOKIES POLICY

When you visit our website and when you and/or your company use our services, we collect certain transaction information by automated means. We do this by using technologies such as cookies, pixel tags, browser analysis tools, server logs and web beacons. We may also collect information about the website you were visiting before you came to our website and the website you visit after you leave our site.

Cookies are small text files that websites send to your computer or device to uniquely identify your browser or to store information or settings in your browser. We place cookies on your computer or other device when you use it to visit our website.

Types of cookies

Technically-required cookies

These are cookies that are mandatorily required for the technical functions of our website e.g. session cookies.

For these, consent is not required and we will delete technically-required cookies when you leave the website.

Cookies that are not technically-required

We only use cookies and/or other tracking mechanisms that are not technically-required if you have given us your prior consent the first time you visit our website.

We use such cookies for marketing purposes so that we are able to communicate better with you based on your interests.

- Statistics: by using statistical tools we measure for example the number of your page views.
- Conversion tracking: our conversion tracking partners place a cookie on your computer if you accessed our website via an advertisement of the respective partner.
- Social plug-ins: some of the pages of our website involve content and services of other providers (for example, Facebook, Twitter, LinkedIn, Google+), who may also use cookies.
- Retargeting: these cookies create user profiles by means of advertising cookies or third-party advertising cookies or so called "web beacons" (invisible graphics that are also called pixels or tracking pixels), or by means of comparable technologies. These are used for interest-based advertising and to control the frequency with which the user looks at certain advertisements. The relevant provider is the controller responsible for the processing of data in connection with the tool. The providers of the tools might disclose information also to third parties for the purposes mentioned above. Please note the data protection notices of the relevant provider in this context.

Cookies and your Personal Data

We collect many different types of information from cookies and other tracking mechanisms. For example, we may collect information about your device type, your operating system type, browser type, domain and other system settings, language and IP address.

In many cases, we only use this information statistically in a non-identifiable way, without any reference to personal data – in other words, in these cases we are not able to uniquely identify you from the information collected. For example, we use information we collect about all website users to understand website traffic patterns.

Where you have contacted us through a contact form on our website and provided your name and contact details to us, we do associate the information we collect using cookies and other tools with your personal data – in other words, in these cases we do identify you. This Privacy Policy applies to information we collect using cookies and other tools only when we associate it with personal data about or referring to you.

Managing your cookie preferences

In many cases, you can manage cookie preferences and opt-out of having cookies and other data collection technologies used by adjusting the settings on your browser. Please go to the 'help' section of your browser to find out about cookie preferences and other privacy settings that may be available in your browser and how to set them.

OUR SERVICES Privacy Policy

1. [Some technical terms for your understanding](#)
2. [Information regarding Reference Image Data Subjects](#)
3. [Information regarding Query Image Data Subjects](#)
4. [Information regarding End Users](#)
5. [Where do we store data?](#)
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1. SOME TECHNICAL TERMS FOR YOUR UNDERSTANDING

What is 'Personal Data'?

'Personal Data' means any data (in Singapore, whether true or not), about or relating to an individual who can be identified from that data (including when it is put together with other information to which we have or are likely to have access) or is otherwise an identified or identifiable individual.

Examples of Personal Data

Your name, plus information such as your phone number, physical or email address, your employer's name and your job title, is personal data. Your image in a photo or video may be personal data. Your IP address may also be personal data.

Who or what is a 'data subject'?

An individual who can be identified from personal data is called a 'data subject'.

Reference Image Data Subject

We build up a 'reference database' of images of products from various sources – we call images in the reference database 'reference images'.

The sources include businesses that provide images to us to add to our reference database to use in providing our visual search and recognition services. The sources also include business that provide us with images so that we can provide annotation and tagging services.

Some reference images may include an individual, such as a model in a clothing catalogue or an actor in a video. If so, that individual is a 'reference image data subject'.

Query Image Data Subject

Any individual, as an [external end user](#), can upload an image and send it to us to request a visual match to an item in it that the individual wishes to find available for purchase if the individual has an app, website or a mobile device that is integrated with our visual search

and recognition service. The apps / websites send the image to us either directly or via our business partner that provided the app/website used by the end user. In addition, an [internal end user](#) can upload an image and send it to us for testing our visual search and recognition services. We call any such image a 'query image'.

Some query images may include the image of an individual. If so, that individual is a 'query image data subject'.

End User

As an individual you can upload a [query image](#) and send it to us to request a visual match to an item in it and/or select a category of products that you want to search. You can do this if you have an app or if you use a website or mobile device that a business integrates with our visual search and recognition services. If so, we refer to you as an 'external end user'.

If you represent a business that is our customer, you can upload a query image and send it to us to test our visual search and recognition services and/or send us images for annotation or tagging. If so, we refer to you as an 'internal end user' – please refer to our Privacy Policy – General for information about personal data about or relating to you that we may process.

Where both external end users and internal end users are treated in the same way, in this Privacy Policy we simply use the term 'end user' of our services.

2. INFORMATION REGARDING REFERENCE IMAGE DATA SUBJECTS

What is a reference image and reference image data subject?

We build up a 'reference database' of images of products from various sources – we call images in the reference database 'reference images'.

The sources include businesses that provide images to us to add to our reference database to use in providing our visual search and recognition services. The sources also include business that provide us with images so that we can provide annotation and tagging services.

Some reference images may include an individual, such as a model in a clothing catalogue or an actor in a video. If so, that individual is a 'reference image data subject'.

Why we process the personal data of reference image data subjects

If you are a reference image data subject we process your personal data incidentally:

- when we index images and convert them into digital representations so that we can search for and return visual search results to our [end users](#)
- when a business asks us to provide annotation or tagging services and
- when we process reference images in our prediction models and when we annotate them with information, in each case for the essential task of developing, supporting, continuously improving and optimising the ViSenze Service for the benefit of the businesses that use them.

We say 'incidentally' here because our services concentrate on the item in the image. But we cannot avoid processing your personal data too – for example, for product matching we need to know where your face is in the image and we need to detect your gender so that we can return relevant visual matches to the end user.

We process personal data for these purposes on the basis that it is necessary for the purposes of our legitimate interests and that, by doing so, we do not override the interests or fundamental rights and freedoms of the reference image data subject that requires protection of personal data.

Who receives the personal data of reference image data subjects?

If you are a reference image data subject your personal data:

- will be disclosed to [external end users](#) and [internal end users](#) of our visual search and recognition services when we return visual search results to them that include your image and to internal end users of our annotation and tagging services when we provide those services to businesses and
- may be disclosed to personnel of our annotation service providers – we have entered into strict confidentiality arrangements with them

How long we keep a reference image

If the reference image is related to product retailing we seek to keep visual matches that we return to [end users](#) relevant to their likely current purchasing preferences. By default we keep reference images for 12 months after the relevant business closes its account with us, but businesses generally update their reference images regularly so they are up-to-date and may ask us to delete them immediately after, or a specified time (such as three months after) they close their account with us.

If the reference image is not related to product retailing, the relevant business generally requires us to delete the images after they close their account with us, but it may require us to delete reference images during the course of an ongoing relationship with them.

When we process reference images in our prediction models for the essential task of developing, supporting, continuously improving and optimising the ViSenze Service for the benefit of the businesses that use them, the reference images may become unidentifiable during such use and, in any event, we delete them when we cease using the prediction model.

Where we store reference images

We store a copy of all reference images in Singapore for the essential task of developing, supporting, continuously improving and optimising the ViSenze Service for the benefit of the businesses that use them.

3. INFORMATION REGARDING QUERY IMAGE DATA SUBJECTS

What is a query image and a query image data subject?

Any individual, as an [external end user](#), can upload an image and send it to us to request a visual match to an item in it that the individual wishes to find available for purchase if the individual has an app, website or a mobile device that is integrated with our visual search and recognition service. The apps / websites send the image to us either directly or via our business partner that provided the app/website used by the end user. In addition, an [internal end user](#) can upload an image and send it to us for testing our visual search and recognition services. We call any such image a 'query image'. Some query images may include the image of an individual. If so, that individual is a 'query image data subject'.

Why we process the personal data of query image data subjects

If you are a query image data subject we process your personal data incidentally:

- when we convert a query image into a digital representation so that we can search for visual

matches to the item requested by the end user who uploaded the query image in which you are the query image data subject

- when we analyse query images because we returned less than ideal results and
- when we process query images in our prediction models and when we annotate them with information, in each case, for the essential task of developing, supporting, continuously improving and optimising the ViSenze Service for the benefit of the businesses that use them

We say 'incidentally' here because our services concentrate on the item in the image. But we cannot avoid processing your personal data too – for example, for product matching we need to know where your face is in the image and we need to detect your gender so that we can return relevant visual matches to the end user.

We process personal data for these purposes on the basis that it is necessary for the purposes of our legitimate interests and that, by doing so, we do not override the interests or fundamental rights and freedoms of the query image data subject that requires protection of personal data.

Who receives the personal data of query image data subjects

If you are a query image data subject your personal data may be disclosed to personnel of our annotation service providers – we have entered into strict confidentiality arrangements with them.

How long we keep a query image

Some businesses require us to delete query images immediately after we return visual search matches for them and others specify a period of time – such as a few weeks or months – for which we may keep them. Otherwise, we may decide to retain query images for up to one year:

- so that we can establish a sub-set / sample of query images that we can use as a 'reference set' of query images to measure our search engine's performance and
- so that we can respond to any feedback from the external end user (for example, about bad query results) so we can refer back to the original query image to replicate the error and to take remedial action for the essential task of developing, supporting, continuously improving and optimising the ViSenze

Service for the benefit of the businesses that use them and

- we process personal data for these purposes on the basis that it is necessary for the purposes of our legitimate interests and that, by doing so, we do not override the interests or fundamental rights and freedoms of the query image data subject that requires protection of personal data.

Where we store query images and IP addresses of external end users

If you are an [external end user](#) and you are located in the European Economic Area we store the query images you send us in a data centre in a Member State of the European Union. We keep your location information attached to such query images in the European Economic Area too. Otherwise, we store query images in a data centre agreed with the business through which we provide our services to you.

However, we also keep a copy of your IP address (which provides location information) in our system logs.

4. INFORMATION REGARDING END USERS

What is an 'End User' ?

As an individual you can upload a [query image](#) and send it to us to request a visual match to an item in it and/or select a category of products that you want to search. You can do this if you have an app or if you use a website or mobile device that a business integrates with our visual search and recognition services. If so, we refer to you as an 'external end user'.

If you represent a business that is our customer, you can upload a query image and send it to us to test our visual search and recognition services and/or send us images for annotation or tagging. If so, we refer to you as an 'internal end user'.

Where both external end users and internal end users are treated in the same way, in this Privacy Policy we simply use the term 'end user' of our services.

Being an external end user and also a query image data subject

It is possible for you, as an external end user, to choose to send us a [query image](#) that is a selfie. If you do so, the query image contains your personal data and you are both the [query image data subject](#) and the external end user.

What personal data we collect, why and how long we keep it

- **Collecting your IP address**

If you are an external end user who uploads a query image or searches product categories (for example, if you want to see red shirts or blue blouses), we collect your IP address – as a result of the way the technology works, your IP address is attached to the query image or product category search.

- **Using your IP address**

We use the IP address for troubleshooting – where we experience technical difficulties in our visual search and recognition service, we can isolate the geographic location where they are occurring, which increases our ability to fix those technical difficulties.

- **How long we keep external end user location data**

We keep external end user location information – that is, your IP address – in Singapore for up to 12 months. We do so for the purpose of debugging and optimising search results and continuously improving our visual search and recognition services. Our systems logs contain for each external end user their IP address, their device type and their browser name. Because we retain our systems logs for up to 12 months, we retain a copy of this information, including the IP address of the end user, for up to 12 months too.

- **Lawful basis of processing**

We do not consider that IP addresses used only for troubleshooting, or any other information in our systems logs, are personal data. However, if in fact they are personal data we process them for troubleshooting on the basis that it is necessary for the purposes of our legitimate interests and that, by doing so, we do not override the interests or fundamental rights and freedoms of the external end user that requires protection of personal data.

5. WHERE DO WE STORE DATA?

We have five data centres globally at present. They are in Ireland, Singapore, Japan, China and the US. We may add more data centres in the future. Generally, we store personal data about [external end users](#) who are located in the European Economic Area in our server in Ireland although, as set out in this Privacy Policy, we also store some personal data in our server in Singapore. Otherwise, we store personal data in the servers requested by the businesses through which we provide our services to external end users.

6. HOW WE PROTECT YOUR

We take the security of your personal data seriously. We have appropriate security measures in place to prevent your personal data being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal data to those employees, agents, contractors and

PERSONAL DATA

other third parties who have a business 'need to know'. They will process your personal data only on our instructions. Details of these measures can be obtained by [contacting us](#).

We have procedures in place to deal with any suspected personal data breach and will notify the relevant business partner and any applicable supervisory authority of an actual or suspected personal data breach where we are required by contract or law to do so.

If we transfer personal data from a country that has data protection legislation to a country that does not have an equivalent standard of data protection legislation we enter into strong contracts to provide that the personal data with protection as required by the GDPR.

7. YOUR RIGHTS

Special circumstances of reference image data subjects, query image data subjects and end users

If you are a [reference image data subject](#), a [query image data subject](#) or an [external end user](#) the purposes for which we process any personal data in a reference image and a query image, respectively, do not require us to identify you (and we do not do so). Therefore, we are not obliged by the GDPR to maintain, acquire or process additional personal information in order to identify you for the sole purpose of enabling you to exercise any of the data subject rights described below.

However, you may be able to exercise such rights if you provide us with additional information enabling us to identify you. We would also need information to enable us to pinpoint the reference image and/or query image in connection with which you wish to exercise your rights.

Your right to access personal data about or relating to you

Subject to special circumstance, you have the right to obtain confirmation from us as to whether or not we are processing personal data concerning you. Where we are doing so, you have the right to obtain a copy of the personal data undergoing processing from us and:

- information about the purposes of the processing, the categories of personal data concerned, the recipients or categories of recipient to whom the personal data have been or will be disclosed (in particular recipients in third countries or international organisations), where possible, the envisaged period for which we will store the personal data or, if not possible, the criteria we will use to determine that period and

- any available information as to the source from which we collected the personal data, including whether it came from publicly available sources

This information is included in this Privacy Policy and can be found categorised by ['reference image data subject'](#), ['query image data subject'](#) and ['end user'](#).

Your right to rectification of personal data concerning you

Subject to special circumstances, you have the right to obtain from us without undue delay the rectification of inaccurate personal data concerning you.

Your right to erasure – the 'right to be forgotten'

Subject to special circumstances, you have the right to obtain from us the erasure of personal data concerning you without undue delay if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- you object to us processing the personal data on the grounds of our legitimate interests and we do not have overriding legitimate grounds for the processing
- the personal data have been unlawfully processed or
- the personal data have to be erased for compliance with an obligation in European Union or Member State law to which we are subject

Your right to restriction of processing

Subject to special circumstances, you have the right to obtain from us restriction of processing of personal data concerning you where one of the following applies:

- you contest the accuracy of the personal data, for a period enabling us to verify the accuracy of the personal data
- the processing is unlawful and you oppose the erasure of the personal data and request the restriction of their use instead
- we no longer need the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defence of legal claims

- you have objected to processing, pending the verification whether our legitimate grounds of processing override your legitimate interests

Your right to lodge a complaint with a supervisory authority

If you believe that we have not complied with your rights as a data subject and you live in the European Economic Area, you can lodge a complaint to the supervisory authority in the country in which you live.

Your right to know about any automated decision-making

We do not use any personal data about you for automated decision-making, including profiling. Where we return visual matches to query images, to the extent that our visual search and recognition service includes automated decision-making it concerns the item in the query image and not any personal data about you.

8. CONTACT US

We are ViSenze Pte. Ltd ('ViSenze', 'we', 'us', 'our', etc.), a company incorporated in Singapore with registration number 201221002E. Our registered office and place of business is at 67 Ayer Rajah Crescent #07-11 Singapore 139950.

We are always happy to provide additional information about how we process personal data and to answer any questions about our processing activities. You can contact us by writing to us at our address above or by emailing dataprotection@visenze.com.

General Data Protection Regulation (GDPR) – European Representative

Pursuant to Article 27 of the General Data Protection Regulation (GDPR), Visenze has appointed European Data Protection Office (EDPO) as its GDPR representative in the EU. You can contact EDPO regarding matters pertaining to the GDPR by:

- using EDPO's online request form: <https://edpo.com/gdpr-data-request/>
- writing to EDPO at Avenue Huart Hamoir 71, 1030 Brussels, Belgium

If you are our employee or a job applicant, please contact our Human Resources Department or email careers@visenze.com and we will be happy to provide you with information about how we process personal data in that context.

UK General Data Protection Regulation (GDPR) – UK Representative

Pursuant to the UK GDPR, Visenze has appointed EDPO UK Ltd as its UK GDPR representative in the UK. You can contact EDPO UK regarding matters pertaining to the UK GDPR:

- by using EDPO UK's online request form: <https://edpo.com/uk-gdpr-data-request/>
- by writing to EDPO UK at 8 Northumberland Avenue, London WC2N 5BY, United Kingdom

9. TERMS OF USE

If you are an 'End User' as described in our Privacy Policy these Terms of Use form a contract between you and Visenze Pte Ltd ('Visenze', 'we', 'us', 'our', etc), which you accept when you use our visual search and recognition service. If you do not agree to these Terms of Use, you may not use that service.

1. You shall be solely responsible for all images you transmit to us when you choose to use our visual search and recognition service.
2. We shall not be liable for the lawfulness, accuracy, integrity or quality of such images. Under no circumstances shall we or our officers, agents, employees, licensors, users, suppliers, holding companies, subsidiaries, affiliates or related companies be liable in any way for any image, including but not limited to any exposure to offensive, indecent or objectionable images, any errors or omissions in any images, or any loss or damage of any kind suffered by you as a result of the receipt, storage or processing or use of any images you send to us.
3. In the event any loss, expense or cost is suffered or incurred by us arising from or in connection with you transmitting an image to us when you choose to use our visual search and recognition service, you indemnify us for such loss, expense or cost.
4. You agree not to use our visual search and recognition service to:
 - upload any image that is unlawful under the laws applicable to our visual search and recognition service, harmful, threatening, abusive, harassing, tortious, defamatory, vulgar, obscene, pornographic, libellous, invasive of another's privacy, subversive, hateful, or racially, ethnically or otherwise objectionable or contrary to public interest, public order or national harmony in all relevant jurisdictions;

- harm minors in any way;
 - upload any image that you do not have a right to make available under any applicable law or under contractual or fiduciary relationships;
 - upload any image that infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party;
 - upload any image that contains software viruses or any other computer code, files or programs designed to interrupt, destroy or limit the functionality of any computer software or hardware or telecommunications equipment;
 - engage in unlawful activity or intentionally or unintentionally violate any applicable law, statute, ordinance, regulation, rule or code, including, but not limited to, any regulations, rules, notices, instructions or directives of any regulatory body or authority, governmental agency or national or other securities exchange of any jurisdiction; and
 - contribute any illegal or unethical or abusive content, or use our visual search and recognition service for any abusive or illegal activity. We may, but are under no obligation to, review all images and remove or block access to them if we think that they fail to comply with any one or more of the above prohibitions.
5. We shall in no way be liable for:
- any aspects of the search results that we return to you, including but not limited to, their accuracy, the description of goods and their conformity with that description, product liability, the quality of goods, intellectual property rights, safety, support, service, content and charges;
 - the accuracy and completeness of the search results, which we do not guarantee and/or
 - any consequences of your use of our visual search and recognition service, including your decision whether or not to proceed with a purchase based on the search results, that decision being at your sole discretion
6. These Terms of Use, the visual search and recognition service and any dispute arising out of or in relation to the use of the visual search and recognition service, shall be governed and construed in accordance with the law of Singapore, regardless



of your country of origin or where you access the visual search and recognition service and without giving effect to any conflicts of law principles that would result in the application of the laws of a jurisdiction other than Singapore.