

## Privacy Policy

Effective Date: May, 2023. This SaaS Privacy Policy replaces and supersedes all prior versions.

Skintonics operates SaaS beauty AR service provided by Perfect Corp and related platform features available for through mobile devices, tablets and computers and through other consumer electronic devices ("Service(s)"). As used in this policy, "Skintonics" refers to GGP Marketing and its subsidiaries and affiliates. This policy applies to all authorised operations of the Service available through our website. Please note the service is governed by our Privacy Policy. We may refer to Skintonics as "we", "us", or "our". We may refer to you as "customer", "end user", "you", or "your". The purpose of this policy is to inform you about the personal information we collect, how we use and share that information, and the ways in which you can control how we use and share that information. By using our Service, you agree to the terms of this policy and you expressly consent to the collection, use, and disclosure of your personal information in accordance with this policy.

### INFORMATION WE RECEIVE OR COLLECT FROM YOU

#### Information You Choose to Provide to Us

When you interact with us to enquire about our Services such as name, address, phone numbers and email address. We or third parties acting on our behalf receive data from you whenever you provide us with information.

#### Technical Information

We may collect certain technical information through the use of log files and servers. Web and application servers create log files automatically as part of their setup and configuration. Information in a log file may include IP address, browser type, Internet service provider, date/time stamps, MAC address, file requested, and other usage information and statistics. Usage information and statistics and stamps and MAC address file requested and other usage information and statistics.

#### Device and location Information

If you access and use the Service from a computer, mobile phone, tablet, automobile, or other electronic device, we may collect information about those devices. For example, our servers receive and store information about your computer and browser, including your Internet Protocol (IP) address, browser type, and other related software or hardware information. If you access the Service from a mobile phone, tablet, automobile, or other electronic device, we may collect and store information such as device type, operating system version and type, unique identifiers (such as mobile advertising ID and MAC address), carrier, and other related information for that device. You can disable this access at any time in your system settings.

#### Biometric information

We and/or a third party utilising or offering the Services to you or acting on our behalf or at our direction may collect, capture, store, use, receive or otherwise obtain a scan of your face or any data or information based on the scan of your face which may include your face geometry ("biometric information") for the purpose of providing personalised Services. We and/or any such third parties do not and will not use facial recognition or identification technology in providing the Services. We and/or any such third parties do not and will not store, use, possess, retain or have access to your biometric information after your use of the Services has completed, at which time the initial purpose for collecting, capturing, storing, using, receiving or otherwise obtaining the biometric information has been satisfied. At no time, during or after your use of the Services, will any of your biometric information be stored on or received, possessed or otherwise obtained by any server, system or location outside of the device you use to access the Services.

#### Service-based data management (see below)

Skintonicsai provides for various subscriptions-based Services on our platform, data will be processed, managed and retained depending on the type of Service you subscribed including free access. You may refer to Service-based data management details below to find out more on how data is managed when using the Service.

#### Membership Account Data

On our Site, you can register for an account with your email address, your customer ID, your account name and your account password you create which you will automatically create an account for yourself, with this account, you can use it to manage and update your Personal Data.

#### Transaction Data

If you make any purchases on our Site, we will process your contact and billing information, such as your name, address, and bank or credit card information. You can view the exact information required in the form provided at point of access. We will only use this data to complete your order, for billing purposes, and for internal accounting.

#### Customer Support Data

You can communicate with us by using the specified email address for requests on technical assistance, request information on the status of your order, or otherwise reach out to our customer support team. In order to respond to your request, we will process your contact data as well as the contents of your request. Once your request has been compiled, we will delete this data pursuant to our data retention period described under EU legislation.

#### Email/Direct Mail Data

Unless you opt in for this feature in our Site, from time to time, we may interact with you directly by mail, email, or telephone to inform you about new services, features, products, or special offers that you told us you were interested in receiving (including our newsletters). However, we will not contact you with any commercial communications that are unrelated to our Site unless you have given us your prior consent to receiving such information. When responding to one of these campaigns, you may have the option to provide us with personal information, which we will use for the purpose indicated.

#### Business contact or sales prospect data (on Site)

If you are a business contact or sales prospect that has provided us your Personal Data, we will store your data in our database so that we can follow up on previous business conversations we've had with you, and provide you additional information about our services and features which you are interested in. We may also share your Personal Data with our sales agents employed with our local affiliates to connect with you with respect to any potential prospect of business opportunity we will have with you.

#### INFORMATION WE RECEIVE OR COLLECT FROM THIRD PARTIES

We may receive or collect information about you from third parties, and combine and store it on our servers with other information we may have already received or collected from you.

These third parties include:

Service partners that provide or make available features and functionality, and content on or through the Service.

Governmental or quasi-governmental agencies or organisations that provide or make available, to the public, census and demographic data.

We are not responsible for, and will assume no liability, if a business partner or other entity collects, uses, or shares any information about you in violation of its own privacy policy or any applicable laws, rules, or agreements.

#### COOKIES

When you use our Services, we automatically collect some information. We may collect information about your usage of and activity on our Services. When you visit our website, information we may automatically log includes, for example, your operating system, cookies, Internet protocol (IP) address, access times, browser type and language and the website that you visited before visiting our website.

This information includes:

Device information. We collect device-specific information (such as your hardware model, operating system version, unique device identifiers and mobile network information). We may associate your device identifiers with your Account.

Log information. When you use our Services provided by us, we automatically collect and store certain information in servers.

Information we collect includes:

Internet protocol (IP) address.

device event information such as crashes, system activity, hardware settings, browser type, language, the date and time of your visit to our website, mobile app and/or computer software.

cookies that may uniquely identify your device or your account registered with us.

Location information. When you use the Service on our website, mobile app and/or computer software, we may collect and process information about your location, via various technologies including Internet protocol (IP) addresses.

Cookies and similar technologies. Cookies are small data files stored on your hard drive by a web browser. Skintonicsai uses cookies and similar technologies, for example, web beacons, to provide our websites and online services and to help collect data. Web beacons are electronic images we may use on our websites or in our emails to deliver cookies, count visits and understand usage and campaign effectiveness, such as whether you open and act on an email that we send you.

Please be informed that any information we collect from your input, feedback, information about you or information obtained will be treated as personal information.

You may also set your browser to block all cookies, including cookies associated with our Service, or to indicate when a cookie is being set by us. However, it's important to remember that many of our Services may not function properly if your cookies are disabled. Most web browsers automatically accept cookies but provide controls that allow you to turn off, block or delete them. Learn more at

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DAndroid&hl=en>

Please be aware that if you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

We provide you with the ability to access, rectify, update and erase your data on our Service by contacting us at the contact details shown on our website for any other enquiries relating to your account information.

#### HOW WE USE INFORMATION WE RECEIVE OR COLLECT

We may use your registration data and other information or data we receive or collect, other than biometric information, as well as data we derive or infer from combinations of the foregoing, for a variety of purposes, such as:

To provide and improve the Service, and to develop new products and services.

To measure and analyse Service usage and enhance the Customer experience on our Service.

To continue and provide better Service for you or similar purposes.

We and/or a third party utilising or offering the Services to you or acting on our behalf or at our direction may use any biometric information that we or such third party collect, capture, receive or otherwise obtain only to provide personalised Services and not for identification, facial recognition or any other purpose. We and such third parties will not sell, lease, trade or otherwise profit from your biometric information.

#### HOW WE SHARE INFORMATION WE RECEIVE OR COLLECT

We treat your Personal Data with care and confidentially and will only pass it on to third parties to the extent described below and not beyond. We do not share, sell, rent, or trade Personal Data with third parties for any promotional purposes. Where our affiliates,

resellers, or service providers process Personal Data, they will do so solely on our instructions and have undertaken to comply with strict contractual requirements for the security of your data (including, but not limited to, complying with this privacy statement). Subject to your consent, we may share the data, other than biometric information, collected from you including email address you submitted to us in the following manner:

#### Third Party Service Provider

Our provider Perfect transmits data to service providers that enable us to provide our Site and market, sell, payment process and delivery. This includes the parties providing our third-party cookies and tracking tools, as well as parties providing us with services to assist us in processing transactions, including bank and credit card transactions, handling shipping and processing of orders, providing customer support, managing customer relationships, hosting the Site, collecting, storing, or removing your information, or performing statistical analysis, providing marketing assistance, investigating fraudulent activity, conducting customer surveys, technical and customer support, perform tracking and reporting functions, conduct quality assurance testing providing customer service, customer surveys and other services in connection with the Site or Apps. We sometimes need to share your information with these companies in order for them to provide the applicable services.

#### Third Party Service Provider by Our Partners Server

Our partners server is established on Amazon Web Services (AWS), your information may be transferred to AWS in order to provide the Service to you or for such other purposes as set forth in this policy. Your data transferred to AWS will be processed, managed and retained depending on the type of Service listed in the Service-based data management details below.

#### Legal and Security Purposes

We may share your information in order to (i) protect or defend the legal rights or property of partner Perfect, or the legal rights of our business partners, employees, agents, and contractors (including enforcement of our agreements); (ii) protect the safety and security of Perfect or members of the public including acting in urgent circumstances; (iii) protect against fraud or to conduct risk management; or (iv) comply with the law, legal process, or legal and government requests of England and Wales

#### Sharing of De-identified, Aggregated, or Anonymised Information

Skintonicasai may share with corporate affiliates and/or business partners de-identified, aggregated, or anonymised information we receive or collect, such as demographic information, location information, information about the computer or device from which you access the Service, or information about your interactions with the Service.

Skintonicasai acting as a third party utilising or offering the Services to you or acting on our behalf or at our direction who possesses any of your biometric information will not disclose, re-disclosure otherwise disseminate your biometric information without first obtaining your consent unless the disclosure, re-disclosure or dissemination completes a financial transaction that you or your legally authorised representative requested or authorised; the disclosure, re-disclosures or dissemination is required by the governing law of the jurisdiction of England and Wales.

#### DATA INTEGRITY.

We use the information we collect in ways that are relevant and compatible with the purpose for which that information was collected or provided to us as disclosed in this policy. We will take steps to ensure that all information collected, processed, and/or stored is protected from destruction, corruption, or use in a manner inconsistent with our policies or the purpose for which we received it. We have implemented security measures designed to protect against the loss, misuse, and alteration of the information we collect or receive from you. For example, when you enter personal information on our subscription forms, we encrypt the transmission of that information using secure socket layer technology (SSL).

We and/or a third party utilising or offering the Services to you or acting on our behalf or at our direction who possesses any of your biometric information will takes steps to protect all such biometric information using a reasonable standard of care within our industry and in a manner that is the same as or more protective than the manner in which We and Perfect Corp and/or such third parties transmits and protects other confidential and sensitive information.

#### DATA SUBJECT RIGHTS

##### GDPR

Pursuant to the European General Data Protection Regulation (GDPR) and other relevant data protection laws, you have right to request access to and rectification or erasure of your personal data, data portability, restriction of processing of your personal data, and the right to lodge a complaint with a governing authority and if you wish to exercise any of these rights, you can write to us.

#### TERMS RELATING TO BIOMETRIC INFORMATION LAWS

We may collect and process your biometric information for the purpose of providing this personalised Service. We do not and will not use facial recognition or identification technology in providing our Service. Under certain biometric information protection law, including but not limited to the Biometric Information Privacy Act ("BIPA"), we must inform you of how we collect and process Biometric Information (as defined under BIPA) as a result of the Services we provide to you, namely the virtual scan and score of your face.

##### Biometric Information Defined.

As used in this policy, "Biometric Information" includes both "biometric identifiers" and "biometric information" as defined in the Biometric Information Privacy Act. "Biometric identifier" means a retina or iris scan, fingerprint, voiceprint, or scan of hand or face geometry. "Biometric information" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's biometric identifier used to identify an individual.

#### Purpose for Collection of Biometric Information.

Our partner Perfect collects, processes, and stores your Biometric Information through our Services, allowing you in real-time to engage in our Services. For example, our Service allows users to undergo a true-to-life virtual Skin Analysis using our world-class facial mapping technology. Specifically, for the processing of facial characteristics information, we will only detect your facial feature vectors in order to apply real-time virtual skin conditions thereon, upon your usage of our Services.

#### Authorisation.

By using our Services, you acknowledge that you have read our Privacy Policy. You further acknowledge and voluntarily consent to us and our partner Perfect, its affiliates, and service providers collecting, processing, and storing your Biometric Information as outlined in this Privacy Policy. You further acknowledge and confirm that you are legally able to enter into this agreement allowing us, our affiliates, and service providers to collect, process, and store your Biometric Information, or you are the legally authorised representative of the user(s) who will be using these Services. You further acknowledge and consent to us disclosing your Biometric Information to our affiliates and service providers in providing the Services to you and as required by our ordinary business purposes. You further acknowledge and agree that consenting to the collecting, storing, and processing of your Biometric Information is a condition to you using our Services, including our mobile devices. If you do not consent to us, our affiliates, and service providers collecting, storing, and/or processing your Biometric Information, or cannot legally consent, you should not use our Services.

#### Disclosure.

We treat your Biometric Information with care and confidentiality. We do not share, sell, rent, or trade Biometric Information with third parties for any promotional purposes. Where our affiliates or service providers process your Biometric Information, they will do so solely on our instructions and comply with strict contractual requirements for the security of your Biometric Information. Although we make every effort to preserve user privacy, we may need to disclose your Biometric Information when required by law, such as when we have a good-faith belief that such action is necessary to comply with a current judicial proceeding, a court order, or litigation or other legal process or action (whether or not initiated by us) to protect us, our users' or third parties' rights, property or safety. We will transmit data to public authorities such as law enforcement or tax authorities only in the case of a legal obligation to do so based on a request for information from the respective authorities.

#### Retention Schedule.

For our Services, neither your facial photo/video nor your facial feature vectors will be stored in our database in any form whatsoever, whether or not you use our Services. We do not and will not store, use, possess, retain or have access to your Biometric Information after your use of the Services our products and services has completed, at which time the initial purpose for collecting, capturing, storing, using, receiving or otherwise obtaining the Biometric Information has been satisfied. At no time, during or after your use of the Services, will any of your Biometric Information be stored on or received, possessed or otherwise obtained by any server, system or location outside of the device you use to access our Services. However, if you choose to opt-in to our services or submit a request for "get photo" / "save and share" via email, we will temporarily store your photos used to extract facial features in our email server, for no longer than 2 years, in order to send to you as instructed by you. After such time, we permanently destroy all copies of your Biometric Information in our possession and ensure that our service providers do the same.

If you choose to delete your account, we delete things you have posted, such as your photos and status updates, unless subjected to a valid warrant, or order issued by a court of the jurisdiction of England and Wales, or other legal or regulatory proceeding, we will comply with this retention schedule and destruction guidelines.

#### Data Storage.

Skintonics uses a reasonable standard of care to store, transmit, and protect the Biometric Information collected from unwarranted disclosure. We store, transmit, and protect your Biometric Information in a manner that is the same as or more protective than the manner in which we protect and handle our Company's confidential and sensitive information.

#### OUR POLICIES CONCERNING CHILDREN

The Service is available for all users. In the event we obtain actual knowledge that we have collected information from children under the age of 16, we will take measures to remove such information from our servers. If you believe that we might have any personal information from a child under 16, please contact us.

#### CHANGES TO OUR PRIVACY POLICY

We will continue to evaluate this policy against new technologies, business practices, changes in law, and your needs, and may make changes to the policy accordingly. Please check this page periodically for updates. If we make any material changes to this policy, we will post the updated terms of the policy on the Service, and provide you notice of such changes, which may include notice by email through a message sent to the email address you use to access the Service, or posting a message on the Service. Any material changes to this policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Service. Please note that at all times you are responsible for updating your information to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice. If you do not wish to permit changes in our use of your information, you must notify us prior to the effective date of the changes that you wish to deactivate, terminate or cancel your account with us. Please note that the continued use of the Service following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

## PERSONAL INFORMATION PROTECTION

We strive to protect the security of your information during transmission using, for instance TSL software, which encrypts information you input. It is important for you to protect against unauthorised access to your password and to your mobile device. Be sure to sign off when finished using a shared mobile device.

## GOVERNANCE

We will conduct compliance audits of our relevant privacy practices to verify adherence to this policy. Further, we will conduct follow up investigations to verify that attestations and assertions regarding our privacy practices are accurate. You may inquire about an inaccuracy or make a complaint about a potential violation to us via the contact information provided on our website. We do engage in training to support implementation and compliance of our privacy practices; any employee that we determine is in violation of this policy may be subject to disciplinary action.

## DISPUTE RESOLUTION

We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of information in accordance with the principles contained in this policy. This Privacy Policy shall be governed by and interpreted in accordance with the laws of England & Wales without regard to conflict of law principles. You hereby irrevocably consent that any legal action or proceeding arising under or in connection with this Privacy Policy must be submitted to the personal and exclusive jurisdiction of arbitration in the courts of England for the purpose of arbitrating any dispute.

YOU UNDERSTAND AND AGREE THAT, BY ENTERING INTO THIS PRIVACY POLICY, YOU WAIVE THE RIGHT TO COURT ACTION OR GO TO COURT.

## CONTACT US

If you have any questions about this privacy policy, or the privacy practices, contact us at the email [enquiries@skintonicsai.com](mailto:enquiries@skintonicsai.com)