Privacy Policy

Last updated on: ...

1. Introduction

1.1. This Privacy Policy sets out how Commeasure Pte. Ltd. (2 Tanjong Katong Road, #05-01, PLQ3, Singapore 437161), together with its affiliates, including PT Commeasure Solutions Indonesia and Commeasure Solutions Philippines Inc. ("RedDoorz" or "We"), collects, stores, uses, manages, controls, transfers, and protects your personal information when you access or use Our website, mobile application, or other communication media with Us (collectively referred to as the "Platform").

1.2. Please note that capitalized words and expressions, unless otherwise defined or required by the context, have the meanings set out in the Terms and Conditions of Our Platform. By using the RedDoorz Platform, you agree to the matters further described in this Privacy Policy.

2. Consent

2.1. By visiting and registering as a User on Our Platform, using any of Our Services, and giving consent by actively ticking the checkbox for the processing of your personal data, you acknowledge that you have read and understood this Privacy Policy, and you consent to the collection, use, disclosure, and processing of your Personal Data by Us for the purposes set out in this Privacy Policy. If you do not agree with this Privacy Policy, you are not permitted to, and must immediately stop, accessing Our Platform, registering as a User, or using Our Services.

2.2. Furthermore, you represent that the Personal Data you provide and/or will provide is yours to share and is true and accurate. You may withdraw your consent by contacting Our Data Protection Officer.

3. Data We Collect

3.1. Based on the consent you give when accessing the Platform, creating an account and/or making a booking, you must provide Us with Personal Data for Us to record and store.

3.2. The Personal Data you submit through Our Platform may vary depending on the Services you choose. Some categories of Personal Data that We collect are as follows:

i. Identity Data, which includes name, country of domicile, age, and/or gender.
ii. Contact Data, which includes email address and/or telephone number.
iii. Transaction Data, which includes payment details, payment methods, reservations, and bookings.
iv. Purchase History, which includes all of your booking information.
v. Usage Data, which includes information about how you use Our Platform (including the length of time you use Our Platform, the types of services you search for and/or how you search for those services).

vi. Marketing and Communications Data, which includes your interests, feedback, survey responses, your preferences in receiving marketing materials from Us and your communication preferences, as well as your preferences for certain products or services.
vii. Technical Data, which includes your Internet Protocol (IP) address, web information, your device's internet identity or media access control address, information about the manufacturer, model, or operating system of the device you use and/or information about the web browser you use to access Our Platform.

4. Methods of Collecting Personal Data

We collect your Personal Data:

4.1. Directly from you. You may provide Us with your Personal Data when you do any of the following (for yourself or on behalf of your organization):
i. Use Our Platform;
ii. Create an account on Our Platform;
iii. Register for or request information about Our Platform or Services;
iv. Participate in promotional programs, surveys, events or other marketing campaigns that We organize;
v. Subscribe to Our newsletters or alerts;
vi. Request that marketing materials be sent to you; or
vii. Contact Us, for example, when you submit questions, complaints, or feedback through the official communication channels set out in the Consumer Consultation and Complaint Services section of Our Terms and Conditions.

4.2. From your authorized representative. We may also collect your Personal Data from your authorized representative (including a party to whom you have given a power of attorney or written authority). This collection is carried out based on your consent or another valid legal basis, in accordance with the security procedures and processing purposes set out in this Privacy Policy.

4.3. When you interact with Our Platform. We may collect your Technical Data automatically when you interact with Our Platform. We may collect such Personal Data by using cookies on Our Platform.

4.4. From third parties or other public sources. We may receive your Personal Data from third parties in various countries. This includes:
i. Technical Data from data analytics providers (for example, Google), advertising networks and social media platforms (such as Instagram, Twitter, Facebook, etc.); and
ii. Contact and Transaction Data from technical, payment, and delivery service providers.

5. Use of Personal Data

5.1. We may collect and use your Personal Data for any or all of the following purposes, which in any event will not exceed what is reasonable for Us to provide Our Services to you:

i. Registering you as a new customer.
ii. Processing and executing your orders from Our Platform.
iii. Managing your account, including managing payments, fees and charges, as well as collecting and receiving money owed to Us.
iv. Managing your relationship with Us.
v. Administering, operating, providing, maintaining and protecting Our business and Our Platform (including troubleshooting, data analysis, testing, system maintenance, support, reporting and data hosting, and ensuring that unauthorized users do not access information on Our Platform).
vi. Delivering relevant content and advertisements to you and measuring or understanding the effectiveness of the advertising We deliver to you.
vii. Providing you with suggestions and recommendations about products or services that may interest you.
viii. Sending you information about Our relevant events, news, or promotions.
ix. Enabling you to complete surveys or participate in promotions, surveys, events, or other marketing campaigns that We organize.
x. Contacting you in connection with all of the above.

Where We must use your Personal Data for other purposes as required by laws or regulations, for example, to respond to requests from administrative, judicial, or law enforcement agencies or to comply with applicable laws and regulations.

6. Disclosure of Personal Data

6.1. When you visit Our Site and/or use Our Services, We may, with your consent and confirmation, disclose Personal Data to other companies, organizations and individuals, including Our subsidiaries and each of their affiliates ("Third Parties"), for the following purposes and for other purposes permitted by applicable laws and regulations:

a. if you are a User, to facilitate bookings or other interactions between Users and/or Property Partners;
b. if you are a User, to enable Us and/or Property Partners to perform or provide Services or features within Our Platform;
c. if you are a Property Partner, to enable Users to request, receive and complete any bookings or reservations from Users to you;
d. to Third Parties (including agents, providers, suppliers, contractors, partners and anyone who carries out processing on Our behalf, provides Services on the Site, provides services to Us or anyone We collaborate with) in connection with verification, authentication, risk assessment, fraud prevention, and product development and maintenance as We or other Third Parties may deem necessary before providing Services to you, including activities related to anti-money laundering prevention;

e. if you are a User, to facilitate refund processes or insurance claims with Property Partners;
f. if you are a User, to facilitate verification processes with any third party providing services on Our Platform.

6.2. We are committed to keeping confidential, safeguarding, respecting and upholding your Personal Data, and We will never share, provide, distribute, or trade your Personal Data with any party other than as stated in this Privacy Policy. However, this provision does not apply where:

a. There is legal recognition by another third party of ownership of your Personal Data prior to disclosure;
b. Your Personal Data is available as public information where such availability violates the law; and/or
c. Your Personal Data is required to be disclosed under a court order, in court proceedings, a lawful request from law enforcement, and/or under the provisions of applicable laws and regulations.

7. Cookies

7.1. We use cookies to give you a personalized experience. Cookies are information transferred by the Platform to your computer's memory or hard drive for record-keeping purposes. We use cookies to allow access without re-entering the visitor's User ID, to make improvements, and to better tailor Our Platform to the needs of Our visitors. We also use this information to verify that visitors meet the criteria required to process their requests.

7.2. Most browser settings you use have options that allow you to control whether the browser will accept cookies, reject cookies, or notify you each time cookies are sent. If you disable or reject cookies, please note that some parts of Our Platform may not be optimally accessible.

8. Change of Purpose of Use of Personal Data

8.1. We will only use your Personal Data for the purposes We described in point [5] above, unless We reasonably consider that We need to use it for another purpose and that reason is compatible with the original purpose.

8.2. We may update this Privacy Policy from time to time to reflect changes to the Services or applicable legal provisions. If We make material changes relating to the purposes of processing your Personal Data, We will notify you in advance through a notice on the Platform or possibly through Our other communication media, and will request your consent again where required by applicable law before such new processing is carried out.

9. Promotional and Marketing Offers

9.1. We will only send you promotional materials, special offers, marketing, or information about upcoming events if you have expressly given your consent to receive such marketing communications.

Based on the consent you give, We may contact you or send marketing messages through the following communication channels:

a. Electronic Mail (Email);
b. Instant Messaging Application (WhatsApp); and/or
c. Application notifications (push notifications), whether appearing on the device (device-level) or within Our Platform (in-app notifications).

9.2. You have the right to withdraw your consent or refuse to receive marketing communications at any time through the following methods for each communication channel:

a. WhatsApp: Pressing the off button for promotional notifications in the settings menu of Our Platform, or using the message opt-out feature (Stop/Opt-out) available directly on the WhatsApp chat screen you receive;
b. Email: Clicking the unsubscribe link at the bottom of every promotional email We send;
c. Push Notifications: Managing and disabling push notification permissions through the settings menu on each of your mobile devices; or
d. Submitting a written request by email to dataprotection@reddoorz.com.

9.3. If you provide Us with your Contact Data, you may receive periodic mail or calls from Us with information about new products and services or upcoming events.

10. Retention of Personal Data

10.1. We retain your Personal Data reasonably and proportionately to achieve the purposes stated in this Privacy Policy, based on criteria such as the length of time We need to provide the Services to you, and to fulfill Our legal obligations, such as retaining information for tax and accounting purposes. Our retention of your Personal Data is governed by applicable laws and regulations. We will notify you of the deletion and/or destruction of Personal Data by email after you submit a request for deletion and/or destruction of Personal Data.

10.2. In some circumstances We may anonymize your Personal Data (so that it can no longer be associated with you and is no longer categorized as Personal Data) for research or

statistical purposes, in which case We may use this information indefinitely and without further notice to you.

11. Access, Correction, and Deletion of Personal Data

11.1. You have the right to request access to and obtain a copy of the Personal Data We hold about you, or information about how We use or disclose your Personal Data.

11.2. You also have the right to request the correction or updating of any of your Personal Data that We hold. We generally rely on the Personal Data you provide. We want to ensure that your Personal Data is current, complete, and accurate. Please inform Us if there are any changes to your Personal Data.

11.3. If you wish to make (a) an access request; (b) a correction request; (c) a request to suspend or restrict the processing of your Personal Data; or (d) a deletion request, you may submit your request in writing or by email to Our Data Protection Officer at dataprotection@reddoorz.com. We will respond to your request no later than 3 x 24 hours after the Data Protection Officer receives the request.

11.4. If We are unable to provide access to Personal Data or make the correction you requested, We will provide you with written notice along with the reasons for the refusal, unless the provision of such reasons is prohibited or waived under the provisions of the Personal Data Protection Laws and Regulations.

11.5. We may need to request specific information from you to help Us confirm your identity. This is a security measure to ensure that Personal Data is not disclosed to anyone who is not entitled to receive it. We may also need to verify the accuracy of new data you provide to Us.

12. Cross-Border Transfer of Personal Data

12.1. Your Personal Data may be transferred from the country where you are located when using the Services ("Country of Origin") to another country ("Destination Country"). Such Destination Countries include, but are not limited to, countries where Our affiliates, third-party service providers, or data centers operate, such as India and/or other countries where Our server facilities or cloud computing infrastructure are located.

12.2. When We transfer your Personal Data from your Country of Origin to a Destination Country, We will comply with the legal and regulatory obligations relating to your Personal Data, and will make all reasonable efforts to ensure that your Personal Data is protected to at least a standard of protection comparable to the protection under the law.

13. Protection of Personal Data

We take steps to ensure that your Personal Data is treated securely and in accordance with this Privacy Policy. However, it is important to note that no platform can guarantee the absolute security of your Personal Data.

Although We strive for reasonable and proportionate security standards, you understand and acknowledge that no method of data transmission over the internet, electronic system, or electronic storage can be guaranteed to be absolutely secure from the risk of cyberattacks or third-party crimes beyond Our reasonable control.

You are responsible for maintaining the confidentiality of your login information and password. We urge you not to share your account credentials with anyone. We are not responsible for any loss or data leakage arising from your negligence in maintaining the confidentiality of your own account credentials.

The security protection standards and mechanisms described in this Privacy Policy apply only to Personal Data collected and processed directly through Our Platform. This protection does not cover information or data that you submit to Us outside the Platform.

14. Personal Data Breach

14.1. We will ensure that the Personal Data We collect, hold, process, and store is secure from unauthorized or unlawful use, processing, sharing, and other forms of personal data breach. We will investigate to resolve data breaches in accordance with Our internal incident management procedures and the provisions of applicable laws and regulations. If you have information or reason to believe that your Personal Data stored by Us has been affected by a personal data breach, you may contact Our Data Protection Officer at dataprotection@reddoorz.com.

14.2. Where required by law, We will deliver an official written notice to you and to the Personal Data Protection Agency and/or the competent government authorities no later than 3 x 24 hours after a failure of Personal Data protection is confirmed.

14.3. Although We have made Our best efforts to secure and protect your Personal Data, please note that the transmission of data over the Internet is never completely secure. Accordingly, We cannot guarantee 100% security of data provided or sent to Us by you, and any provision of information by you is at your own risk. If any dispute arises from the processing of Personal Data under the Services, you must proceed by complying with the procedures and provisions set out in the applicable laws and regulations relating to data protection and privacy.

15. Collection of Information from Children

Our Services are not intended for children under the age of 18 without being accompanied by a parent or legal guardian. We apply a strict policy regarding age limits for the safety and protection of children.

If you know and/or become aware that We are processing Personal Data of a child under the age of 18 (eighteen) years, you must immediately notify Us by email to Our Data Protection Officer at dataprotection@reddoorz.com. Upon receiving such notice, We will promptly take action to stop the processing and delete the child's Personal Data from Our Platform no later than 3 x 24 hours after Our Data Protection Officer receives such information.

16. Links to Other Sites

16.1. Our Platform may contain links to third-party websites, applications, or services. The privacy and data handling practices on such third-party platforms are not governed by this Privacy Policy. We urge you to read the privacy policy of each such third-party platform before providing your Personal Data. We are not responsible for the collection, processing, privacy, or content managed by third parties beyond Our control.

17. Changes to the Privacy Policy

17.1. We may revise this Privacy Policy in whole or in part from time to time. If the contents of this Privacy Policy are amended, We will notify you through a notice posted on Our Platform, or by other appropriate methods, through which you may give your consent to the amended provisions of this Privacy Policy. However, you are responsible for reviewing this Privacy Policy periodically to check for such changes carefully and thoroughly from time to time. We will update the "last modified" date at the beginning of this Privacy Policy. If you do not agree with any amended Privacy Policy, please contact Us below. You can determine whether any revision has been made by referring to the date this Privacy Policy was last updated.

17.2. Where such changes are material or directly affect the purposes of processing Personal Data, expand the categories of Personal Data collected, or affect your rights under applicable law, We will request your re-consent before such changes take effect.

18. Contact Us

If you have any comments, questions, or complaints about Our Privacy Policy, or if you wish to access, correct and/or exercise other rights over your Personal Data, please contact Us at dataprotection@reddoorz.com, addressed to the RedDoorz Data Protection Office. Your question or request will be forwarded to Our authorized team based on your country of residence or the service you use.

- Email: dataprotection@reddoorz.com
- Address of Commeasure Pte. Ltd.: 2 Tanjong Katong Road, #05-01, PLQ3, Singapore 437161
- Address of PT Commeasure Solutions Indonesia: Wisma 46 BNI, 25th Floor, Jl. Jend. Sudirman Kav. 1, Central Jakarta, DKI Jakarta 10220
- Address of Commeasure Solutions Philippines Inc.: 10/F, East Tower, One Ayala, Ayala Avenue, Makati City, Metro Manila, Philippines