

# intobyte

## Privacy Policy

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This Privacy Policy (“Policy”) sets out the basis which intobyte Pte Ltd (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of users and customers in accordance with the Singapore Personal Data Protection Act (“PDPA”). We further take inspiration from the General Data Protection Regulation (GDPR) of the European Union. This Policy applies to all personal data in our possession or under our control. We want to be fully transparent when it comes to the collection, use and disclosure of personal data and aim to guarantee the privacy of our users. For inquiries about this privacy policy, or to execute your rights given in this privacy policy, please contact us:

Company: intobyte Pte Ltd (UEN: 202021370N)  
Address: 160 Robinson Road, #14-04, Singapore 068914  
Data Protection Officer E-mail: [privacy@intobyte.com](mailto:privacy@intobyte.com)

As used in this policy, “user” shall refer to a visitor (acting on their own or on behalf of a legal person) of any of our websites including but not limited to [citymos.net](http://citymos.net), [intobyte.com](http://intobyte.com) or [intobyte.sg](http://intobyte.sg), or a user of one of our software products. “Customer” shall refer to individuals, legal persons, and independent professionals who have acquired licences for one of our software products or have entered into a contract with us for us to supply services.

## 1 Collection of Personal Data

We do not collect your personal data unless it is provided to us voluntarily by you or by a third party which you have duly authorized to disclose your personal data. There exist different channels through which we may collect your personal data.

- a) If you interact with us at conferences, trade shows and other events, where you provide us your contact details in a professional setting.
- b) If you send us an E-mail to an E-mail address listed on our websites, quotations, invoices, EULAs, and other policies.
- c) If you get in contact with us via the contact form on one of our websites.

- d) If you request information about any licence for one of our software products (e.g., a CityMoS Trial licence, an academic licence, or a commercial licence). Depending on the licence requested, you provide us with your name and salutation, your E-mail address, your institution or employer, your country of residence, and the intended use for the requested software.
- e) If you contact or interact with our corporate profiles on social networks such as LinkedIn, X (Twitter), Instagram, Vimeo, or Youtube.
- f) If you register for or participate in one of our online workshops.
- g) If you request support for any of our software products. In some cases, we may request you to share input data to reproduce any problems with our software products you may have encountered. This input data may include personal data.
- h) For payment collection purposes.

Our websites, social media posts, and other content and services provided by us may include links to external websites. We make no representations on behalf of the operators of such websites, nor do we monitor their privacy policy or personal data practices. This policy therefore does not extend to your use of such external websites and we do not take responsibility how and if your personal data is collected or handled by those third parties.

## **2 Use of Personal Data**

We may use your personal data for the following purposes:

- a) To respond to requests submitted by you, e.g., through our websites or via E-mail.
- b) To provide you with services you have requested or purchased, including but not limited checking whether a software licence is still valid.
- c) To offer support for our software products. If you have provided us with input data to reproduce issues encountered with one of our software products, we will not use this input data for purposes other than rectifying a reported issue and will delete this data once the issue is rectified, or when you requested the deletion in writing.

- d) To notify you of updates and information related to our policies and software products that you have subscribed to or that we believe might be of interest to you.

### **3 Disclosure of Personal Data**

In general, we will not share your data with third parties unless we are required by law to do so or we have obtained your written approval to share your data for a specific purpose. Notwithstanding, we may disclose your personal data to select third party service providers (e.g., a distributor in a geographical area), agents (e.g., a third-party support agent) and other organisations we have engaged to perform any services requested by you related to our products. In these cases, we will limit disclosure of personal data to the required minimum (e.g., your name and email) to enable the third party to contact you.

### **4 Consent**

Consent to collect, use, and disclose your personal data according to the sections in this policy is given and assumed through the following means:

- a) Pressing the submit button on any of the forms of our websites. We will not collect any data entered in the contact forms before this button is pressed.
- b) Signing up for newsletters.
- c) Reaching out to us via the E-mail addresses listed on any of our websites.
- d) Following us or connecting with us on any social media platform.
- e) Providing us with your information in a professional context such as trade-shows, conferences, or other events.

If you are acting on behalf of a legal person or as an independent professional, the actions above also provide consent that your data may be processed for commercial purposes.

This consent will remain valid until it is being withdrawn by you. You may withdraw consent for any or all of the purposes listed above by submitting your request via post to our office address or by E-mail to our Data Protection Officer using the contact details provided above.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request.

## **5 Access and Correction of Personal Data**

We follow the guidelines and guarantees provided to you by the Singapore PDPA and take inspiration from the GDPR of the European Union, meaning you may contact us at any time to request access or correction of your personal data.

If you wish to obtain a copy of all personal data which we hold about you, please contact our Data Protection Officer via the E-mail address provided above. In order for us to verify your identity and the legitimacy of your request, you are required to attach a copy of your passport or national ID. You are advised to provide the exact intent of your query by referring to either a) rights of access, b) rectification, c) erasure, d) restriction, e) objection, d) right not to be subject to automated decision-making.

We are not responsible (and not in the position) to access, rectify, or remove your personal data that you have shared a) with other users, b) on any of our platforms (e.g., a user forum), c) on social media platforms, or d) any information that has been collected by internet search engines.

We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days.

## **6 Protection of Personal Data**

We are applying best practice security measures to ensure the confidentiality and integrity of all personal data. This includes administrative, physical as well as technical measures to control access to all our websites, infrastructure, and services.

However, you understand that no method of storage, transmission, or access control over the Internet is completely secure and no security measure is guaranteed to provide full protection.

## **7 Transfer of Personal Data**

If you contact us from within Singapore, we will not transfer your personal data to countries outside of Singapore without your written consent. If consent is given, we will take steps to ensure that your personal data will receive a standard of protection that is at least comparable to that provided under the PDPA.

## **8 Use of Cookies**

Our websites may place and access certain cookies on your computer and/or any other electronic device used to access our websites. We use cookies to improve your browsing experience and to improve the efficacy of our services. We have taken steps to ensure that your privacy is protected and respected at all times.

If you wish to deny the use and saving of cookies from our websites on your device, please take the necessary steps within your internet browser's settings to disallow cookies from our websites. You may choose to delete the cookies at any time. Deleting cookies may lead to your browsing experience to deteriorate and may cause the loss of personalised settings.

## **9 Changes to this Policy**

This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.