

## Introduction

1. This Website ("Website") is operated by TOPPAN Nexus Limited and TOPPAN Nexus Pte. Ltd ("TOPPAN Nexus"). The terms "TOPPAN Nexus," "we," "us," "our" and "ours" when used in this privacy notice ("Privacy Notice") include parents, subsidiaries, divisions, branches, affiliates, or companies of TOPPAN Nexus. The terms "you," "your" and "yours" refer to any user of this Website, including current and future customers, employees, non-employee labor, vendors, and information seekers.
2. This Policy applies to all users of Native's website and SaaS products, whether you are a customer, employee, vendor, or information seeker.
3. The English version of this document is the prevailing version. Any translations provided are for information purposes only. In case of discrepancies, the English version shall prevail.

## Principles

4. We comply with all applicable data protection laws, including but not limited to the Personal Data Protection Act 2012 of Singapore ("PDPA") and Personal Data (Privacy) Ordinance (Cap.486) of Hong Kong.
5. We process personal data lawfully, fairly, and transparently, only for specified and legitimate purposes.
6. We collect only the data necessary for our operations and keep it accurate and up to date.
7. We implement robust security measures to protect your data.
8. We regularly review and improve our privacy practices.

## Legal Basis for Processing

9. We process your personal data based on one or more of the following legal bases:
  - Your consent
  - Performance of a contract with you
  - Compliance with legal obligations
  - Our legitimate business interests (such as improving our services, security, and communications)

## Collection of Personal Data

10. We may collect personal data from you directly, from your employer, or from third parties with your consent or as required by law. Types of data collected include:
  - **Identifiers:** Name, job title, contact details (email, phone), country, city.
  - **Technical Data:** IP address, browser type/version, device information, operating system.
  - **Usage Data:** Cookies, analytics, interaction logs, access and authentication logs.
  - **Service Data:** Texts and documents uploaded for translation, user preferences, billing information.
  - **Employment/Vendor/Customer Data:** Work history, business contact information, contractual details.
11. Native is not intended for children under the age of 16. We do not knowingly collect personal data from children. If you believe a child has provided us with personal data, please contact us for prompt removal.

## Use and Processing of Personal Data

12. Your personal data may be used for:
  - Providing and operating Native products and services
  - Fulfilling service requests and business operations
  - Customer service, support, and communication

- Marketing, promotion, and research (with opt-out options)
- Compliance with legal and regulatory obligations
- Analytics, reporting, and service improvement
- Any other purpose you may agree to from time to time

We do not sell or trade your personal data.

### **Marketing Communications:**

13. You may opt out of marketing communications at any time by following the unsubscribe instructions in our emails or by contacting us.

### **Data Sharing and Transfers**

14. Personal data may be shared with:
  - Other companies within the TOPPAN Nexus Group (locally and overseas)
  - Agents, contractors, or third-party service providers (bound by written contracts and confidentiality/data protection obligations)
  - Governmental or regulatory authorities as required by law
  - In the event of a sale, merger, reorganization, or similar event, as part of an asset transfer
15. Cross-border transfers will be conducted with appropriate safeguards and in compliance with applicable laws. By using our services, you consent to such transfers.

### **Cookies and Website Practices**

16. We use cookies and similar technologies to enhance user experience and analyze website usage. You may disable cookies via your browser settings, but this may affect certain functionalities. Third-party plugins (e.g., social media) may collect data subject to their own privacy policies.

### **Data Retention**

17. We retain personal data only as long as necessary for the purposes for which it was collected, or as required by law. Retention periods are determined by the nature and sensitivity of the data, legal requirements, and business needs. Data is securely deleted or destroyed upon expiry of the retention period.

<b>Data Category</b>	<b>Description</b>	<b>Retention Period</b>
User Data	Profiles, account details	5 years
Authentication Logs	Login/logout attempts	2 years
Transactions	Documents	5 years
Error and Debug Logs	Application logs	30 days

Manual deletion requests will be processed within 30 days.

### **Data Security**

18. We employ physical, technical, and organizational measures to safeguard personal data against loss, misuse, unauthorized access, or disclosure. Access is restricted to authorized personnel only.

### **Data Breach Notification:**

19. In the event of a data breach that may affect your rights and freedoms, we will notify you and relevant authorities as required by law.

### **Your Rights**

20. You have the right to:

- Access your personal data held by us
- Request correction or deletion of inaccurate or outdated data
- Withdraw consent to processing (where applicable)
- Request a copy of your personal data

21. Requests may be subject to legal exemptions and a reasonable administrative fee. To exercise your rights, contact us at [teranotification@toppannexus.com](mailto:teranotification@toppannexus.com).

#### **Complaint to Regulator:**

22. You may also lodge a complaint with the Singapore Privacy Commissioner for Personal Data or your local data protection authority.

#### **Data Processor Role**

23. Where TOPPAN Nexus acts as a data processor on behalf of clients, we process personal data only as instructed by the client. Clients are responsible for obtaining appropriate consent and providing individual notification of purpose.

#### **Automated Decision-Making**

24. Native does not use personal data for automated decision-making or profiling that produces legal or similarly significant effects on individuals.

#### **Links to Other Websites**

25. Our website may contain links to third-party sites. We are not responsible for their privacy practices. Please review the privacy notices of any external sites you visit.

#### **Server Location and International Transfers**

26. Data servers are located in Hong Kong (main hub) and Singapore (secondary hub). Use of our services may result in the transfer of data across international boundaries. All transfers are protected in accordance with this Policy and applicable laws.

#### **Policy Updates**

27. We may update this Policy from time to time. Updates will be posted on our website and take effect immediately upon posting. Please review this Policy regularly.

#### **Contact and Complaints**

28. For enquiries, complaints, or to exercise your data rights, contact:

##### **Data Protection Officer**

Email: [dpo@toppannexus.com](mailto:dpo@toppannexus.com)

Email: [teranotification@toppannexus.com](mailto:teranotification@toppannexus.com)