

Privacy Policy

Effective: November 2020

Welcome to SolarTrade

SolarTrade, a company incorporated as SolisTrade Leasing Services Inc., a corporation duly organized and existing under and by virtue of the laws of the Philippines with SEC number 2020100003193-00 and with principal office address at UNIT 4D D'METYANGS BUILDING, 5064 P. BURGOS ST., POBLACION, MAKATI CITY ("SolarTrade/we/us") is committed to protecting your privacy. Under applicable data protection law SolarTrade is what is known as a 'controller' for the purposes of the collection and use of personal information set out in this privacy policy. At all times we aim to respect any personal information you share with us, or that we receive from other organizations, and keep it safe. This Privacy Policy (the "Policy") sets out SolarTrade's policies and your rights regarding the collection, use, disclosure and protection of your personal information (including through our website, the "Website").

This Policy contains important information about your personal rights to privacy. Please read this Policy carefully before using the services provided through the Website or providing your personal information to SolarTrade.

This Policy is a supplement to our Terms of Service. In case of any contradiction between the provisions in this Policy and in our Terms of Service the latter shall prevail. Unless otherwise defined in this Policy, terms used in the Policy shall be given the same meaning as in our Terms of Service.

1. How SolarTrade collects personal information

SolarTrade may collect personal information about you when:

(a) You give it to SolarTrade directly

For example, personal information that SolarTrade will ask you to provide if you choose to use the Service or register to use the Website, that you give to us by filling in forms on the Website or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use the Website, subscribe to our services, search for a campaign, subscribe to participate in a campaign, make a payment, participate in discussion boards or other social media functions on our site (if available), authorize us to connect with your social media profile(s), enter a competition, promotion or survey, when you report a problem with the Website and when you communicate with us by email or other contact methods.

(b) SolarTrade obtains it indirectly

For example, your personal information might be shared with us by third parties such as our business partners and subcontractors. If connecting to the Service using Facebook/Google/LinkedIn, SolarTrade will collect your authentication information, for example username and access credentials, and other information that may be available through social media channels.

- (c) It is available publicly Your personal information may be available to us from external publicly available sources. For example, your public social media profiles such as Facebook, LinkedIn, Google and others.
- (d) You use our Website.

SolarTrade may also collect certain information, including personal information, automatically. Such information may include information about your interactions with the Service and the Website, content you post or upload to the Service as well as technical data such as your IP address, browser type etc. and other types of identifying information. Similar information may be received from social media accounts, if connected to your Member account. SolarTrade may use cookies and other similar technologies in order to collect the information described here.

2. In general, we may combine your personal information from these different sources for the purposes set out in this Policy. Categories of personal information SolarTrade collects:

SolarTrade may collect, store and otherwise process the following kinds of personal information:

- (a) Your full name and contact details, including date of birth, postal address, country of residence, telephone number, email address and, where applicable, social media identity;
- (b) Information about your purchases and other payments, such as your transaction history
- (c) Information gathered from surveys in which you have participated;
- (d) Information you share with us when you contact us or engage with us;
- (e) Information about your computer/mobile device and your visits to and use of the Website, as set out at 1(d) above;
- (f) Information about our services which you use and we consider may be of interest to you, such as further purchase opportunities;
- (g) Financial information, such as bank details and or credit/debit card details and details of payments made by you;
- (h) Content subscription preferences;
- (i) Social media profile information where it is available to us;
- (j) Any other type of information shared with / obtained by us as listed in section 1 of this notice.

Special category/ sensitive personal information

The PDPA/SG data protection law recognizes certain categories of personal information as sensitive and therefore requiring more protection (referred to as 'Special Category' data in the legislation). This includes information about individuals' health, ethnicity and political opinions.

SolarTrade does not seek to collect sensitive personal information. Where SolarTrade does process this type of special category/sensitive personal information, we will only do so if there is a valid reason and where lawful.

2.2 How and why personal information may be used

Your personal information, however provided to us, will be used for the purposes specified in this Policy. In particular, we may use your personal information:

- (a) To provide you with the Service, and other services, products or information you have requested, such as facilitating purchases and participating in Offers made as part of the Service;
- (b) To provide you with further information and news about our activities, services or products, for example about new purchasing and leasing opportunities (SolarTrade's goal is to provide you with relevant information, which can include, for example, newsletters);
- (c) To answer your questions/requests and communicate with you in general, such as alerting you to updates to our Terms of Service and this Policy;
- (d) To process payments and purchases on your behalf;
- (e) To send you news items which are relevant to your interests
- (f) To manage our relationship with SolarTrade's members and lessors, including registering and personalizing online accounts;
- (g) To confirm your identity in order to create your account and ensure that you are eligible to use the services provided on our Website;
- (h) To report on and measure the performance and effectiveness of our services, activities and products;
- (i) To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- (j) To make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.
- (k) To run and administer our Website, keep it safe and secure and ensure that content is presented in the most effective manner for you and your device;
- (l) To satisfy legal obligations which are binding on us, for example in relation to regulatory, government and/ or law enforcement bodies with whom we may work;
- (m) For the prevention of fraud or misuse of services, such as ensuring that your member account is used in accordance with our Terms of Service;
- (n) For the establishment, defense and/ or enforcement of legal claims; and/or
- (o) To further SolarTrade's aims and functions as a for-profit, social and environmental impact company in general.

3. Lawful bases to use personal information

3.1 Data protection law requires us to rely on one or more 'lawful bases' to use your personal information. We consider the grounds below to be relevant:

(a) Where you have provided your consent for us to use your personal information in a certain way (for example, we may ask for your consent to use your personal information to send you certain types of material by email, and we may ask for your explicit consent to collect special categories of your personal information).

(b) Where necessary so that we can comply with a legal obligation to which we are subject

(c) Where necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering a contract.

(d) Where there is a legitimate interest in us doing so. The PDPA allows us to collect and process your personal information if it is reasonably necessary to achieve our or others' legitimate interests (as long as that processing is fair, balanced and does not unduly impact your rights). In broad terms, our "legitimate interests" means the interests of running SolarTrade as a for-profit social and environmental impact company, pursuing our aims and providing our products and services; When we process your personal information to achieve such legitimate interests, we consider and balance any potential impact on you (both positive and negative), and your rights under data protection laws. We will not use your personal information for activities where our interests are overridden by the impact on you, for example where use would be excessively intrusive (unless, for instance, we are otherwise required or permitted to by law).

4. Sharing personal information with third parties

4.1 SolarTrade will only use your personal information for the purposes listed in this Policy. However, your personal information may be shared with third parties for the same purposes acting on SolarTrade's behalf, such as to facilitate, provide and perform the Service or to assist SolarTrade in analyzing how the Service is used. In that case, SolarTrade remains responsible for such third parties' processing of your personal information. Such third parties have access to your personal information only to perform tasks on SolarTrade's behalf and are obligated not to disclose or use the information for any other purpose.

4.2 Non-exhaustively, those third parties may include:

(a) Members of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

(b) The relevant Tenant if you choose to proceed with an purchase in the particular campaign.

(c) Advertisers and advertising networks that require personal information to select and serve relevant adverts to you and others. We do not disclose personal information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in a particular area of a country). We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience; and analytics and search engine providers that assist us in the improvement and optimization of our site;

(d) Payment processor providers;

(e) Suppliers and subcontractors for the performance of any contract we enter into with them, for example IT service providers such as website hosts or cloud storage providers;

(f) Professional service providers such as accountants and lawyers;

(g) Insurers;

4.3 In particular, we reserve the right to disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the (prospective) seller or buyer of such business or assets;
- If substantially all of our assets are acquired by a third party, personal information held by us may be one of the transferred assets;
- If we are under any legal or regulatory duty to do so; and/or - To protect the rights, property or safety of SolarTrade, its personnel, users, visitors or others.

5. International Data Transfers

5.1 Given that our campaigns are international and because we use agencies and/ or suppliers to process personal information on our behalf, it is possible that personal information we collect from you will be transferred to and stored in a location outside of Philippines & Singapore.

5.2 Please note that some countries outside of Philippines & Singapore have a lower standard of protection for personal information, including lower security requirements and fewer rights for individuals. Where your personal information is transferred, stored and/or otherwise processed outside the Singapore in a country that does not offer an equivalent standard of protection of the PDPA, we will take all reasonable steps necessary to ensure that the recipient implements appropriate safeguards (such as by entering into standard contractual clauses) designed to protect your personal information and to ensure that your personal information is treated securely and in accordance with this Policy.

5.3 Unfortunately, no transmission of your personal information over the internet can be guaranteed to be 100% secure – however, once we have received your personal information, we will use strict procedures and security features to try and prevent unauthorized access.

6. Rights in respect of your personal information

6.1 Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. You also have the following rights:

(a) Right of access – you can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply. To exercise this right, you may email SolarTrade.

(b) Right of erasure – at your request we will delete your personal information from our records as far as we are required to do so. In many cases we will suppress further communications with you, rather than delete it.

(c) Right of rectification – if you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate/up to date.

(d) Right to restrict processing – you have the right to ask for processing of your personal information to be restricted in some circumstances, such as where there is disagreement about your personal information's accuracy or legitimate usage.

- (e) Right to object – you have the right to object to processing where we are
- (i) processing your personal information on the basis of the legitimate interests ground,
 - (ii) using your personal information for direct marketing or
 - (iii) using your information for statistical purposes.
- (f) Right to data portability – to the extent required by the PDPA, where we are processing your personal information (that you have provided to us) either
- (i) by relying on your consent or
 - (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering into a contact, and in either case we are processing using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.
- (g) Rights related to automated decision-making – you have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision
- (i) is necessary to enter into/perform a contract between you and us/another organization;
 - (ii) is authorized by Singapore’s law to which SolarTrade is subject (as long as that law offers you sufficient protection); or
 - (iii) is based on your explicit consent.

6.2 We may ask you for additional information to confirm your identity and for security purposes, before disclosing personal information requested to you.

6.4 You are further entitled to make a complaint about us or the way we have processed your personal information to the data protection supervisory authority in your home country.

7. Retention of personal information

7.1 If you are a registered member, SolarTrade will retain your personal information, in accordance with this Policy for as long as you remain a registered member. You are free to deregister at any time. After such deregistration, SolarTrade will only retain your personal information to the extent necessary and only for as long as it is required by SolarTrade in accordance with applicable law or required by SolarTrade in order to comply with undertakings towards you as a member. Please read the terms of service carefully if you wish to deregister while being involved in an Offer.

8. Cookies, server logs and tracking tools

8.1 SolarTrade uses cookies on the Website. Cookies are alphanumeric identifiers that are transferred to your device’s hard drive through your web browser when using the Website and/or the Service. SolarTrade collects cookies to be able to keep you logged in and thereby improve your experience when using the Service and/or Website. Furthermore, SolarTrade collects cookies to, for example, retrieve user details for each visit in order to create statistics of your and other Members use of the Website and the Services. SolarTrade also uses cookies in order to collect personal information and other information as described in this Policy. You can command your browser either to notify you when you receive a cookie or to refuse cookies altogether. You are of course free to do so but then you may not be able to use all parts of our Website and/or Service.

8.2 When accessing the Website, SolarTrade may log your IP address, access URL, time of access, browser type, and referral URL in order to obtain internal information regarding site traffic statistics. This information is used in an aggregated manner, and is never linked back to any personally identifiable information, unless to identify members who are using the Service for any activity that is deemed in conflict with our Terms of Service or Policy.

8.3 We use third party tracking tools to improve the performance and features of our website. These third party tracking tools are designed to collect only non-personal information about your use of our website.

9. Security

9.1 SolarTrade is committed to keeping your personal information safe and secure and we have appropriate and proportionate security policies and organizational and technical measures in place to help protect your personal information. Even though SolarTrade takes the security of your personal information seriously, please keep in mind that no method of transmission over the Internet, or method of electronic storage, is entirely secure. SolarTrade strives to use commercially acceptable means to protect your personal information and to make sure your personal information is treated securely and in accordance with this Policy, such as ensuring your personal information is only accessible by appropriately trained staff and contractors and stored on secure servers with features enacted to prevent unauthorized access.

9.2 SolarTrade shall not sell, rent or trade your personal information to any unaffiliated third party or third party that SolarTrade does not commercially cooperate with, without your permission, unless we are under a duty to disclose or share your personal information in order to comply with a legal obligation.