

# Privacy Policy

While using Riverr services you agree that you are familiar with the Privacy Policy of our service and accept it.

*Last modified: February, 2021*

## Generally

Your security and right to privacy is important to us. Riverr Pte. Ltd. ("Riverr") respects the rights of our "clients", "visitors" and the "users" of Riverr's "Platform" that includes Apps and websites and all electronic services, applications and internal links on the platform.

Any information you provide via the Platform is respected, kept secret and will not be used in any manner or for any purpose that you have not instructed or permitted. You will find a description of Riverr's data processing practice in this Privacy Policy.

This Privacy Policy applies only to the Platform and does not extend to third party websites or the like that might be accessible from the Platform. We have tried to keep this Privacy Policy as simple as possible. Therefore, information of a technical nature is omitted. If you have questions about this Privacy Policy or technical questions, please contact us for clarification.

By using our Platform, you agree to our Privacy Policy.



# Overall, Riverr collects data:

- To offer our users an efficient, secure data-driven credential management platform;
- To provide identity verification services;
- To meet the legal, accounting and tax requirements;
- To provide information about the Platform - for example about new features;
- To find and fix any 'bugs' or errors at the Platform;
- To provide offers and marketing;
- To authenticate your access to certain parts of the Platform and confirm your consent to our General Terms
- To personalize your experience on the Platform and the websites;
- To improve the Platform and the services that Riverr provides;
- To address specific inquiries you make at Riverr;
- To address and confirm the execution of documents and templates;
- To enable you to use our services, including check your payment information, and billing for the services
- To send newsletters and messages to you.

You can choose to share personal information with other Parties. We will not sell, rent, loan, trade, or the other way disclose your information with third parties unless such disclosure is necessary to: comply with a court order or other legal process.

## Privacy first

### **Privacy is central to the solution.**

Riverr is designed to protect data privacy and satisfy data privacy regulations by adhering to the following privacy principles:

- Agency:** Data are stored or shared only with explicit, informed consent
- Data Minimization:** Only the minimum amount of personal data are used for any transaction



- Federation:** Personally identifiable health information is stored only at the source or on the user's phone
- Use:** Data are only stored to the extent necessary and never used for any other purpose
- Privacy preserving.** Riverr allows individuals to access their lab results and vaccination records, and consent to have that information used to validate their COVID status without revealing any other underlying personal health information.

### **Privacy by design**

Putting privacy first is an important priority for managing and analysing data in response to these complex times (COVID-19-Pandemic). We believe that everyone should be able to indicate compliance with health requirements without compromising their right to strict health data privacy. Our technology is built upon 3 core principles - privacy, security, and portability - to enable you to present your health status without ever losing control of your medical information.

### **Supporting compliance standards**

We expressly support COVID-19 compliance standards and verification systems that are:

Consistently guided by the principles of strict health information protection and privacy-by-design, allowing individuals to retain full control and autonomy over their sensitive health data at all times.

Directed at supporting ongoing and coordinated recovery efforts for a safer and more efficient return to commercial activity and public community life.

Recognised and accepted across all jurisdictions and industries, applying a decentralised and standardised health information model in order to facilitate the widest possible adoption.



# What Is Personal Data at Riverr?

At Riverr, we strongly believe in fundamental privacy rights — and that those fundamental rights should not differ depending on where you live in the world. That's why we treat any data that relates to an identified or identifiable individual or that is linked or linkable to them by Riverr as “personal data,” no matter where the individual lives.

This Privacy Policy covers how Riverr handles personal data whether you interact with us on our websites, through Riverr apps (such as Riverr Delta or Riverr Wallet), or in person (including by phone or when visiting our company address). Riverr may also link to third parties on our services or make third-party apps available in our applications. Riverr's Privacy Policy does not apply to how third parties define personal data or how they use it. We encourage you to read their privacy policies and know your privacy rights before interacting with them.

**Designed to protect privacy.** Riverr is providing a user the ability to request and download their credentials utilising a direct, encrypted connection between the user's personal device and the APIs provided by the health system or clinic. As part of this feature, Riverr is not creating, receiving, maintaining, or transmitting protected health information for or on behalf of a covered entity or business associate.

## When you share your personal information

### **For consumers and private individuals:**

You alone will decide when you want to use a Riverr product or service to identify yourself to a third party, or to send and request information. You choose whether to agree or not to share the information that a third party requests from you.

### **For companies and organisations:**

Riverr encourages companies and organisations to only ask for the information they actually need, for example, your age, confirming you are over 18 rather than a full date of birth. Or confirming your health status without disclosing sensitive details. If you choose to share your information with a third party using Riverr, those third parties may choose to use that



information to communicate with you or they may share that information with others. We suggest you read the privacy policies of any organisation you share your information with to understand how they will use your personal information.

### **Security and data location**

Security is a core business principle. Our products and services do different things, so the specific security details for each one are listed in the relevant product sections. We always keep personal information in secure locations with strict access controls.

The product-specific privacy notices have more information on where we keep data and the security measures relevant to that product.

Where we use other organisations to support our business we have contract terms in place that contain obligations on the other organisation to safeguard your information. Some of these organisations have their servers in other countries. We have contract terms with these third parties and measures in place to cover any transfers of personal information.

If we decide or are obliged to send or store your personal information in another country, we will update the relevant product privacy notice to describe the protections we have put in place.

## **Your rights and choices**

You have several different rights with regard to your personal information. Some rights only apply in certain circumstances or to certain information. There are also exemptions from some rights in some circumstances.

Please click the link below to see information about all the rights. Each product-specific privacy notice sets out what rights apply for that particular product / service. If there is no rights and choices section, this information here applies.

Please send any rights requests to: [privacy@riverr.ai](mailto:privacy@riverr.ai)



# Access rights

You are entitled to know what personal information we hold about you and to receive a copy of it.

For most of our products and services, you provide your personal information and can access it by going into the product / service.

If you want to make an access request for personal information not contained in a product / service you are using, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai)

With regard to the cookies and analytics we use, this information is collected and stored automatically through in-house and third-party tools, as set out in the sections on cookies and analytics. The product-specific sections will set out if there is any analytics information that is linked to any of your personal information.

## In-house analytics

The information we collect is de-identified and aggregated, so it is not possible to search or get the information using your name or your phone's identifiers (for example, the IMEI number which is like a serial number for your phone). We cannot provide you with this information as it is not linked to any of your identifying details.

## Google Analytics information

We use Google Analytics for some products or websites. Google creates and shares with us an identifier (such as, 76c24efd-ec42-492a-92df-c62cfd4540a3). The information that we collect through Google Analytics is linked only to this identifier, and so it is not possible to search or get the information using your name or your device's other identifiers (for example, the IMEI number which is like a serial number for your phone). We cannot provide you with this information as it is not linked to any of your identifying details.

You can make an access request to Google here: <https://support.google.com/policies/contact/sar>



# Correction rights

You are entitled to correct personal information we hold about you that is inaccurate.

For most of our products and services you have the ability to correct or replace inaccurate personal information.

If you have contacted our Customer Support or had other contact with us and want to make a correction request, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai)

# Deletion rights

In certain circumstances you are entitled to ask us to delete the personal information we hold about you.

For some of our products and services you can delete your account or certain information from within the product / service.

If you have any other deletion request, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai)

# Objection rights

In certain circumstances you are entitled to object to Riverr processing your personal information.

If you receive any marketing, there will always be an unsubscribe option.

If you want to contact us about your objection rights, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai)

Restriction rights

In certain circumstances you are entitled to ask us to restrict our processing of your personal information.



You can ask us to do this if:

- you dispute the accuracy of your personal information;
- our processing is unlawful but you prefer restriction to deletion;
- we no longer need the information but you need it for legal reasons; or
- you have objected to our processing and we are still dealing with this objection.

If you want to contact us about your restriction rights, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai) .

## Portability rights

In certain circumstances you are entitled to receive the personal information you have provided us in a structured, commonly used and machine-readable format.

For some of our products and services you can download your personal information from within the product / service. If you have contacted our Customer Support or had other contact with us and want to make a portability request, please email: [privacy@riverr.ai](mailto:privacy@riverr.ai)

We use cookies to provide the service, collect anonymous information and for security purposes. This section provides general information, please see either the 'Cookies' section of the product-specific privacy notice, or the cookie management tool on our websites for more details.

### What's a cookie?

It's an online technology to collect information about you and to store your online preferences. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

### Session cookies

These expire when you close your browser and do not remain on your computer.

### Persistent cookies

These are stored on your computer until they expire or you delete them from your cache. They are normally used to make sure the site remembers your preferences.

Categories of cookies



### **Strictly necessary cookies**

These cookies are essential for you to move around our website and Dashboard and use their features. Without these cookies we cannot provide services you have asked for, such as access to secure areas.

### **Performance cookies**

These cookies collect anonymous information on how people use our Dashboard and website.

### **Functionality cookies**

These cookies remember choices you make, such as your last action, language and search preferences. We can use these to provide you with a better experience based on your preferences. The information from these cookies is anonymous and they cannot track your browsing activity on other websites.

### **Analytics cookie**

Our web-based products use a cookie to implement our in-house analytics for actions you take on your device when using the product. These analytics report at aggregate not individual user level and we use the information to understand how our products are being used and to improve them, as set out in the 'Analytics' section.

How do I delete cookies?

Go to the help and support area on your internet browser for instructions.

Information on deleting or controlling cookies is also available at <https://www.allaboutcookies.org/>.

If you delete or disable our cookies you may not be able to access certain areas or features of our site.



## **Analytics**

We collect information about your device and your use of our products using in-house analytics and third-party tools. The information we collect is de-identified and aggregated so we can't identify you personally. We use it to understand how our products are being used and to improve them. You can opt out of certain analytics in the app and by changing browser settings for web-based products that use a cookie to implement the analytics. This section provides general information, please see the 'Analytics' sections of the product-specific information for more details on analytics used in specific products.

### **What are analytics and why do we use them?**

Analytics means collecting and analysing information about activity on our website and in our app. None of our analytics provide information about you personally. The statistics we get from this data allow us to understand how people are using our products and websites, and things like what works and what doesn't, how long it takes to complete critical tasks and where we have users. Unlike most other companies, we don't build individual profiles of the people who use our products and services. We simply look for trends and patterns to inform business decisions. All these statistics are essential to understanding how our products and websites are performing and identify where we need to focus our efforts to improve.

### **Your choices for analytics.**

You have some control over analytics information collected through settings available in your website browser and on your phone, as well as in the Riverr app settings.

### **Website**

You can clear pixels and cookies by clearing your cache or browsing history and by setting your browser to refuse cookies and pixels.

### **Phone**

Both Android and iOS phones have privacy settings to limit the collection of the Advertising ID.

Apple: <https://support.apple.com/en-gb/HT202074>

Android: <https://support.google.com/ads/answer/2662922?hl=en-GB>

### **Riverr app**

You can opt out of certain analytics through the app settings.



# Data Processor Agreement

“Clients” of the Platform will receive a Data Processor Agreement to be read and signed if they are part of the EU or Member State. The agreement states the rights and obligations of both parties for when Riverr is processing personal information on behalf of the Data Controller. This Agreement is based on a standard which has been designed to ensure the Parties’ compliance with Article 28, sub-section 3 of *Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation)*, which sets out specific requirements for the content of data processing agreements. The Data Processing Agreement contains, but is not limited to, the following points:

that Riverr shall solely be permitted to process personal data on documented instructions from the Data Controller unless processing is required under EU or Member State law to which Riverr is subject.

that Riverr shall ensure that persons authorized to process personal data on behalf of the Data Controller have undertaken to observe confidentiality, or is subject to a suitable statutory obligation of confidentiality.

that Riverr shall take all the measures required pursuant to Article 32 of the General Data Protection Regulation

that Riverr shall meet the requirements of the General Data Protection Regulation in order to engage another processor (subprocessor).

that Riverr shall assist the Data Controller with appropriate technical and organisational measures, in the fulfilment of the Data Controller’s obligation

that Riverr shall be under obligation, at the Data Controller’s discretion, to erase or return all the personal data to the Data Controller

that Riverr is able to show documentation to the data controller.

You can request the full Data Processing Agreement by contacting us.



# Subprocessors

Riverr collaborates with various subprocessors in order to provide the Platform. We utilize third parties to store the Platform, collect feedback, analyze user behavior, fix errors, process payments, send emails and communicate with the users in order to provide customer support and information about the product and to meet the requirements stated by Singapore or EU Law. The subprocessors may get access to your information, solely with the purpose of facilitating the best possible credential management Platform as stated above. They are solely allowed to process data under the instruction you are giving us. Our subprocessors are required to have a privacy policy and security standards in place that is at least as protective of your information as is this Privacy Policy.

Riverr has the Data Controller's general consent for the engagement of subprocessors. Riverr shall, however, inform the Data Controller of any planned changes with regard to additions to or replacement of other data processors and thereby give the Data Controller the opportunity to object to such changes. Such notification shall be submitted to the Data Controller a minimum of 14 days prior to the engagement of sub-processors or amendments coming into force. If the Data Controller should object to the changes, the Data Controller shall notify the Data Processor of this within 7 of receipt of the notification. The Data Controller shall only object if the Data Controller has reasonable and specific grounds for such refusal.

## Relation to the Law

We may share your personal information with public and legal authorities if Singapore or EU-law obliges us to. For example, if we have a justified belief that it is necessary to comply with the EU's General Data Protection Regulation or if we suspect that your use of the Platform violates EU- or Member State laws.



# Security measures - this is how we protect your personal information

We are entitled and under the obligation to make decisions about the technical and organizational security measures that are to be applied to create the necessary level of data security and to protect your personal information against loss, misuse, publicity or unauthorized access. We use firewalls, encryption techniques, and authentication procedures to maintain the security during your sessions on the Platform.

## Unauthorized access to personal information

You can control who you are sharing content and user information with. To prevent unauthorized access, maintain data and ensure the appropriate use of Information, we have implemented commercially reasonable physical, technical and administrative control mechanisms to protect your information. However, we cannot control the actions of other users with whom you share your content and we are not responsible for third party circumvention of any privacy settings or security measures on the Platform.

## Your choice

You may decline to submit personally identifiable information through the Platform, in which case Riverr may not be able to provide certain features and functionalities of the Platform to you - for example, storage of your documents or digital signature. If you decide to terminate your use of the Platform, You can request access to your personal information, and request us to comply with the right to Data Portability at any time, including when and if you decide to terminate your use of the Platform. You can also request that your personal information is deleted. Some information will be stored at least, and at a maximum of 5 years after you terminate your use of the Platform in order for us to comply with any legal obligations - for example regarding tax and accounting obligations.



# Children's Privacy

Our Platform is not directed to persons under the age of 13. We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register for an account on the Platform. If we become aware that we have collected personal information from a child under age 13 without verified consent of a parental or guardian, we take steps to remove that information. We can not control if our users collect and store data of persons under the age of 18. In general, we advise our users to collect parental consent before they collect and store data of anyone under the age of 18.

## Responsibility

Riverr's Platform is an online tool to facilitate the process of creating, signing and storing credentials. It is always your responsibility to ensure that information and content that you enter and upload on the Platform is your property (or has obtained permission to do so). The information and content shall be correct and is not against the law or the rights of others. It is also your responsibility to provide the correct receiver in the transmission of data in the module "connect".

## Updates and Changes to this Privacy Policy

If we change our Privacy Policy, we will post those changes on this page in order to keep you aware of what information we collect, how we use it and under what circumstances we may disclose it. You will furthermore receive an email concerning changes to our Privacy Policy at least 14 days before they enforce. You will then get 7 days to object to the changes in our Privacy Policy.



# Contacting Us

The Website and the Riverr Platform is owned by Riverr Pte. Ltd. (Co. Reg. No 202012249W). If you have questions about our Privacy Policy or to Riverr otherwise, please send an Email to: [hello@Riverr.ai](mailto:hello@Riverr.ai) or call us on phone no. Telephone: +65.83443290 You can also find us on our physical address 6 Raffles Quay, Singapore 048580.

You hereby consent to this Privacy Policy and our general terms and conditions by using Riverr, the Platform or the websites.

