

# Application Privacy Policy

This Application Privacy Policy governs the handling of learning management information in the portal of "iKnowNow Learning Management System" and services relating to this application provided by MOL Information Technology Asia Ltd. (hereinafter referred to as "MITAS"). Please refer to **Article 10 Contact Us** for MITAS' contact information.

This page is used to inform visitors regarding our policies with the collection, use, and disclosure of Personal Information if anyone decided to use the application. Anyone who use "iKnowNow Learning Management System" is regarded as User (hereinafter referred to as "User").

## Article 1 Consent for acquisition, storage and use of user information

User shall be deemed to have acknowledged and accepted the policy when User start to use the application (including, but not limited to, downloading, installing and any other act) even if User do not specifically indicate such acceptance. Please be sure to read and understand the policy before using the application. User may not use the application without accepting the policy.

## Article 2 Products provided by User's organization

1. In case User uses a MITAS product with an account provided by an organization that User is affiliated with, that organization can:
  - (1) Control and administer your MITAS product and product account, including controlling privacy-related settings of the product or product account.
  - (2) Access and process your data, including the interaction data, diagnostic data, and the contents of communications and files associated with your MITAS product and product accounts.
2. If your organization provides you with access to MITAS products, your use of the MITAS products is subject to your organization's policies, if any. User shall direct any privacy inquiries, including any requests to exercise data protection rights of User, to the Administrator of your organization. MITAS is not responsible for the privacy or security practices of our customers, which may differ from those set forth in this privacy policy.
3. When User uses a MITAS product provided by your organization, the processing of User's personal data in connection with that product is governed by a contract between MITAS and your organization. MITAS processes your personal data to provide the product to you and your organization, and for MITAS' legitimate business operations related to providing the product "iKnowNow Learning Management System". As mentioned above, if there are any questions about MITAS's processing of your personal data in connection with providing products to your organization, User is advised to contact your organization. In case User has questions about MITAS' legitimate business operations in connection with providing products to User's organization, please contact MITAS by referring to the contact information as described in **Article 10 Contact Us**.

## Article 3 Entrustment to third parties

MITAS may, at its own responsibility, entrust all or part of tasks necessary for provision of the application to a third party. In such a case, MITAS shall ensure that the relevant third party will assume the similar obligations to those assumed by MITAS under the policy in connection with User, and shall be responsible to User for any act of said third party.

#### Article 4 Information Collection and Use

1. User's information collected by the application shall be used only for the purposes mentioned below.
  - (1) User's information shall be used to publish training courses to User in connection with provision of the "iKnowNow Learning Management System" and the services. The personal information is collected and processed for lawful purpose only.
  - (2) The information shall be handled within the scope of provision of "iKnowNow Learning Management System" and the Software shall not be supplied to any third party without user's consent except for the cases specified in Paragraph 4 of this Article and the cases specified in MITAS' Privacy policy (<https://www.mol-it.com/privacy/>).
  - (3) MITAS ensure personal data is collected and used fairly for its intended purposes only and data shall not be obtained under false pretence.
2. User's information collected by the application shall be as follows:
  - (1) Information collected automatically by the application:
    - \* Terminal information (model, OS version and application ID)
  - (2) Information registered by User
    - \* Login information (user ID/email address and password)
    - \* Organization and Personal information (Company name and Department name, Name and email ID)
    - \* Detail on training course taken, Testing result and scores of enrolled courses and their history

For a better experience, while User is using our Service, MITAS may require User to provide, and/or through the Administrator your organization, us with certain personally identifiable information, including but not limited to Employee Name, Office E-mail Id. The data that we request shall be stored in the system as long as it is required for providing the service.

User may refer to the below table on user information used, obtained and the purpose why they are collected by the application.

User information used by the system	How to obtain?	Purpose of the User Information
User identification information including but not limited to Internet Protocol ("IP") address, device name, operating system version, the configuration of the application.	Auto collection by the Application	To identify User when providing service.

User identification information including but not limited to information such as device Internet Protocol ("IP") address, device name, operating system version, the configuration of the application when utilizing our Service, the time and date of your use of the Service, and other statistics in a case of an error in the application.	Auto collection of Log data by the Application through third party products	To improve services.
<p>User identifiable information including but not limited to information such as cookies that are commonly used as anonymous unique identifiers.</p> <p>The application may use third party code and libraries that use cookies to collect information.</p>	User has the option to either accept or refuse these cookies when a cookie is being sent to your device. If User choose to refuse our cookies, you may not be able to use some or all portions of the services.	To authenticate User when providing services.
Personally identifiable information, including but not limited to Employee Name, Office E-mail ID	Collected by the Company's admin to whom User belongs to	To provide service (essential)
Non-Personally identifiable information, including but not limited to the status of training courses taken, test result and test scores	Collected from the response from User via the Application	The information is used by Administrator(s) or Instructor(s) of the company to which User belongs to.

3. User may operate the Software to control collection of, or delete the User's information within the scope specified below.

(1) User may, within the application, delete the user authentication information registered by User with the Software with the use of the logout function of the Software; however, that the terminal information, organization information, personal information, status of training courses taken, test result and test scores already transmitted to the server of the "iKnowNow Learning Management System" may not be deleted.

(2) Collection of User's status on training courses taken, test result and test scores shall be responded when User is attending training courses and/or taking quizzes/tests.

4. MITAS may employ other third parties and individuals to facilitate our service, to provide service on our behalf and/or to perform service-related services. These third parties may have access to User's information to perform the tasks assigned to them on our behalf. However, they are obligated not to disclose or use the information for any other purpose.

#### **Article 5 Termination of Services and Handling of Information**

1. Termination of use of the Services is governed by the Terms of use of the Subscription between MITAS and the User's company.
2. If the Application or the Service is terminated pursuant to the provisions of the preceding paragraph, the User's information obtained and stored from the User will be discarded from the Server of the system under appropriate management during regular maintenance.

#### **Article 6 Security**

We use administrative, technical, and physical security measures to help protect User's personal information. While we have taken reasonable steps to secure the personal information you provide to us, please be aware that despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online is vulnerable to interception and misuse by unauthorized parties. Therefore, we cannot guarantee absolute security on personal information provided.

#### **Article 7 Data Storage & Transfer**

User data is stored in data server of designated geographic location as determined by MITAS and it may be replicated within a selected geographic area for enhanced data durability in case of a major data centre disaster. MITAS shall take reasonable precautions and due diligence to preserve privacy protections of User data when it is transferred across country borders.

By use of "iKnowNow Learning Management System" and accepting the Privacy Policy, User consents for such cross-border data transfer provision.

No matter where User data is stored, MITAS does not control or limit the locations from which User may access the data.

#### **Article 8 Links to Other Sites**

This Service may contain links to other sites. If you click on a third-party link, you will be directed to that site. Note that these external sites are not operated by us. Therefore, User is strongly advised to review the Privacy Policy of these websites. We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services.

#### **Article 9 Changes to this Application Privacy Policy**

We reserve the right to make changes to this Privacy Policy at any time and for any reason. Any changes or modifications will be effective immediately upon posting the updated Privacy Policy on the Site or App Store, and you waive the right to receive specific notice of each such change or modification.

You are encouraged to periodically review this Privacy Policy to stay informed of updates. You will be deemed to have been made aware of, will be subject to, and will be deemed to have accepted the changes in any revised Privacy Policy by your continued use of the Site or the application.

#### **Article 10 Contact Us**

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact

MOL Information Technology Asia Ltd.

Unit B-D, 11/F, KC 100, 100 Kwai Cheong Road, Kwai Chung, N.T., Hong Kong

Email : [MIT-info@molgroup.com](mailto:MIT-info@molgroup.com)