

To register and compete as a fighter in HSS, you need to agree to the Terms of Service below. Additionally, when you create an account, we process your information as described in our Privacy Notice, including the following key points:

# Privacy Notice

## INTRODUCTION

The following Privacy Notice explains how we, PT Aneka Bintang Gading (hereinafter referred to as "HWG" or "We"), obtain, collect, store, control, use, process, analyze, rectify, update, display, announce, transfer, disclose, and protect your Personal Data ("Processing Personal Data" or "Performing Personal Data Processing"). This Privacy Notice applies to all Users of our website (including the Holywings App), websites (including [www.hss.hwgroup.id](http://www.hss.hwgroup.id) and its subdomains), features, services, and products (collectively referred to as the "Website"), unless specified in a separate privacy notice.

This Privacy Notice is provided in a layered format so you can click on specific areas available below. Please read this Privacy Notice thoroughly to ensure you understand our data protection practices. We aim to make this easy to understand, so we have summarized the key points in the Summary section. Terms in capital letters used in this Privacy Notice will have the same meaning as those terms in the Terms and Conditions applicable between you and HWG. The Privacy Notice also has the same meaning as the privacy policy as stated in our Website Terms and Conditions.

## Acknowledgment and Consent

By agreeing to the Privacy Notice, you acknowledge that you have read and understood this Privacy Notice and agree to all its provisions. Specifically, you consent to us Processing your Personal Data in accordance with this Privacy Notice.

If you provide us with Personal Data related to other individuals (such as Personal Data related to your partner, family members, friends, or others), you represent and warrant that you have obtained consent from those individuals, and hereby consent on their behalf for their Personal Data to be Processed by us. We may request proof of that consent from you at any time.

## SUMMARY

### What Kind of Data(s) Do We Collect?

We collect Personal Data when you use our Website, including personal information, contact data, eligibility data, log data, and/or location data. We also collect device and technical data from you, as well as any other data you may provide or send when using our Website. If you choose not to provide such data, we may not be able to provide our services and Website to you as normal.

### How Do We Use Your Data?

We use your data to manage and organize your account with us, communicate with you, and provide various features, services, and functions for you on our Website. We also use your data to maintain our Website and adapt our services to meet your needs. Additionally, we use your data for data collection and services to you, as well as services from companies (with your consent if required by applicable law).

## Who Do We Share Your Data With?

We use third-party services solely to process and/or store your data for the purposes described in this Privacy Notice. We also share your data with our affiliates for the purposes described in this Privacy Notice and with government agencies and other authorities as required by applicable law. We may also provide access by displaying your Personal Data to other Users to facilitate communication and/or the fulfillment of services on our Website.

## Where Do We Process Your Data?

We process your data in several locations, both within Indonesia and outside Indonesia. We may also transfer your data to our affiliates and third-party partners outside Indonesia for the purposes specified in this Privacy Notice.

## How May I Exercise My Rights Regarding My Data?

We process your data as long as you give consent and as necessary to fulfill the purposes of its acquisition and collection, or as required by applicable law.

You may have various rights regarding your Personal Data based on applicable laws. If you wish to exercise your rights, you can submit a data subject rights request to HWG, including requests for user data deletion through our Website. More information can be accessed at [www.hss.hwgroup.id](http://www.hss.hwgroup.id).

## Contact Us

If Users have questions, comments, complaints, or claims regarding this Privacy Notice, or if Users wish to access and/or correct their Personal Data, please contact us through the page at [www.hss.hwgroup.id](http://www.hss.hwgroup.id).

## How Will We Notify You of Changes?

We will change this Privacy Notice from time to time and notify you about the updated version through our Website or your registered email with us. Please check back periodically for any updates or changes to this Privacy Notice.

Further explanations on the above can be read in the section below.

## PERSONAL DATA COLLECTION

### Types of Personal Data We Collect About You

“Personal Data” refers to data that identifies or can be used to identify, contact, or locate a person or device associated with that data. Personal Data includes, but is not limited to, name, address, date of birth, phone number, email address, gender, identification (including passport or national identity documents) or other government-issued identifiers, photo, citizenship, phone numbers of Users and non-Users in your mobile contact list, and other data classified as Personal Data according to applicable regulations. To avoid doubt, applicable regulations refer to all applicable laws, budgets, legislations, regulations, policy regulations, ordinances, protocols, industry codes, traffic codes, regulatory permits or requirements from any court, tribunal, or government authority, as well as endorsements, regulations, administrative or judicial authorities or oversight bodies, applicable from time to time during the term of this Privacy Notice (“Applicable Regulations”).

Additionally, other data, including personal profiles and/or unique identifiers, linked or combined with Personal Data, also constitute Personal Data.

The types of Personal Data we collect depend on the circumstances of collection and the nature of the requested services or transactions conducted.

To the extent permitted by Applicable Regulations, we may process, collect, use, store, and transfer various types of Personal Data, which we categorize as follows:

1. **Personal Information** including name, username, password, identification card, tax identification number, user identity or other identifiers, title, date of birth, gender, place of birth, occupation, nationality, photo, and/or biometric data.
2. **Contact Data** including billing address(es), shipping address(es) and labels, email address(es), phone number(s), and contact list.
3. **Eligibility Data** including, in relation to Sellers, such as licenses, approvals, and insurance policy details.
4. **Technical Data** including details about your use of our Application, such as application-generated identifiers (user ID), IP address, data about web pages viewed before or after, duration of each visit/session, device ID or MAC address, advertising ID, and other device information including manufacturer, model, and operating system information used to access the Application, and crash logs.
5. **Device Data** including device data, such as the type of device you use to access the Website, including hardware model, operating system and version, software, IMEI number, file name and version, language preferences, unique device identifiers, advertising identifiers, serial numbers, device movement information, and/or cellular network information.
6. **Log Data** including records on servers that receive data such as the IP address of the device, date and time of access, features of the application or pages viewed, application workflows, and other system activity, browser type, and/or third-party sites or services that Users used before interacting with the Application.
7. **Location Data** including your real-time geographical location data, location coordinates in the form of longitude and latitude, and Wi-Fi location.

We may create, use, license, or disclose Aggregate Data such as statistical or demographic data for any purpose. Aggregate Data may derive from your Personal Data but will not be considered Personal Data because this data will not directly or indirectly disclose your identity, as we will ensure: (i) that all identifiers have been removed in such a way that the data, alone or in combination with other available data, cannot

be linked or associated with or identify anyone, and (ii) that the data is then combined with similar data so that the original data forms part of a larger data set.

## If You Provide Incomplete Personal Data

Should you choose not to provide that Personal Data or provide incomplete Personal Data when requested, we may not be able to provide services and fulfill the agreements we have or are in the process of agreeing upon with you.

## How We Collect Your Personal Data

The Personal Data we collect may be provided directly by you or by third parties (for example: when you register or use the Website, when you contact our customer service, or otherwise when you provide Personal Data to us). We may collect data in various forms and for different purposes (including purposes permitted by applicable regulations).

### 1. Data We Collect Directly from You or Your Mobile Device

You may provide us with Identity, Contact, Eligibility, Profile Data, including in circumstances where such information is requested by us or required by applicable regulations, when interacting with us directly or corresponding with us via mail, email, or otherwise. This includes Personal Data you provide when you:

1. Register and create an account using the Website;
2. Use the Website, including if you register as a Boxer or use the services as a User;
3. Use chat features (including but not limited to product discussions, chat with Customer Service) on the Website; and
4. Provide feedback or contact us.

### 2. Data Collected Each Time You Use the Website

You may provide us with Technical and Location Data each time you use and/or visit the Website. Whenever you access the Website via your mobile device, we will track and collect your geographical location data in real-time. In some situations, you may be asked to enable the Global Positioning System (GPS) on your mobile device so we can provide you with a better experience using the Website. You can always choose to disable geographic location tracking on your mobile device temporarily. However, this may affect the functions available on the Website. Additionally, each time you use and/or visit the Website, certain data may also be collected automatically using cookies. Cookies are small files stored on your computer or mobile device. We use cookies to track User activity to enhance the interface and User experience. Most mobile devices and web browsers support the use of cookies; however, you can adjust the settings on your mobile device or web browser to refuse certain types of cookies or specific cookies. Your mobile device and/or browser also allow you to delete any cookies previously stored at any time. However, this may affect the functions available on the Website.

### 3. Data Collected from Third Parties

We may also collect your Personal Data from third parties (including agents, vendors, suppliers, contractors, partners, government institutions, and others providing services to us, collecting Personal Data and/or performing tasks on our behalf, or cooperating with us). In such cases, we will only collect your Personal Data for or in connection with purposes involving those third parties or our cooperation with those third parties (depending on the circumstances).

### 4. Data About Third Parties You Provide to Us

You may provide us with Personal Data related to other third parties (including Personal Data related to your partner, family members, friends, or other individuals). In such cases, you will, of course, need to obtain consent from those third parties — see “Acknowledgment and Consent” above for more information.

## How We Use Your Personal Data

We may use the Personal Data collected for the following purposes and for other purposes permitted by applicable regulations ("Purposes"):

### 1. If you are a User, we may use your Personal Data:

1. identify and register you as a User and to create, verify, deactivate, or manage your account on our Website;
2. To enable HWG to provide services, whether already available, requested by you, or future services;
3. To communicate with you and send you data related to your use of the Website;
4. To inform you of any updates to the Website or changes to the services provided;
5. To process, address, and respond to complaints, issues, questions, and suggestions received from you;
6. To maintain, develop, test, enhance, and personalize the Website to meet your needs and preferences as a User, including enabling features to personalize your User account;
7. To monitor and analyze User activity, behavior, and demographic data, including habits and usage of various services available on the Website;
8. To process and manage your reward ranking; and
9. To send you marketing communications, surveys, and targeted data, as well as information about special offers or promotions, and when events, promotions, features, or launches occur.

2. Whether you are a User or a party providing Personal Data to us, we may also use your Personal Data more generally for the following purposes (although in certain circumstances, we will always act reasonably and will not use your Personal Data more than is necessary for those purposes):

1. To carry out related business processes and functions;
2. To monitor the use of the Website and manage, support, and enhance performance efficiency, growth, user experience, and Website functionalities;
3. To provide assistance regarding and resolve technical difficulties or operational issues with the Website or services;
4. To generate statistical and analytical data for testing, research, analysis, commercial partnerships, and cooperation;
5. To prevent, detect, and investigate any suspicious behavior or prohibited, illegal, unauthorized, or fraudulent activities;
6. To enable us to comply with all obligations under applicable regulations, including but not limited to responding to requests, inquiries, or decisions in accordance with regulations, complying with legal or regulatory archiving, reporting, and licensing requirements, and conducting due diligence and investigations; and
7. For any other purposes we notify you of, and where required by applicable regulations, we obtain your consent.

## Disclosure of Your Personal Data

We may disclose, provide access to, or share your Personal Data with our affiliates and other parties for the following purposes, as well as for other purposes permitted by applicable regulations:

1. To respond to regulatory inquiries, questions, requests, investigations, decisions, and reporting requirements, and to comply with filing requirements as stipulated in applicable regulations;
2. If instructed, requested, required, or permitted by competent government institutions, for purposes specified in letters, policies, government regulations, or applicable regulations;
3. If there is any legal process of any kind between you and us, or between you and another party, related to the services, for the purposes of that legal process;
4. When our services are available on any third-party platform, (i) to assist us in obtaining your Personal Data and/or (ii) to register you or enable you to use our services on those third-party platforms;
5. In emergencies related to your health or safety, for the purpose of addressing those emergencies;
6. In situations related to your health or public interest, we may share your Personal Data with competent government institutions and/or other institutions designated by the government or

cooperating with us, for contact tracing purposes, supporting initiatives, government policies, public health, and other purposes as reasonably needed;

7. To third parties (including agents, vendors, suppliers, contractors, partners, and others providing services to us or you, performing tasks on our behalf, or cooperating commercially with us), for or in connection with purposes involving those third parties, to carry out disclosures to the relevant third parties that are technically necessary to process your transactions or for our cooperation with those third parties (depending on the circumstances), which may include allowing those third parties to introduce or offer products or services to you, authenticate you, or connect you with accounts, or engage in other activities including marketing, research, analysis, and product development; and
8. With our affiliates or other third parties that assist us in providing the Website, to operate our business, or for data processing on our behalf.

When there is Personal Data that does not need to be linked to you, we will make reasonable efforts to remove the association of that Personal Data with you as an individual before disclosing or sharing that data.

We will not sell or rent your Personal Data.

In addition to what is outlined in this Privacy Notice, we may disclose and share your Personal Data after notifying you or obtaining your consent for such disclosure or sharing.

## PROTECTING YOUR PERSONAL DATA

### Data Security

The confidentiality of your Personal Data is of utmost importance to us. We will implement our best efforts to protect and secure your Personal Data from unauthorized access, collection, use, or disclosure, as well as from processing that contravenes the law, accidental loss, destruction, and damage or similar risks.

However, because data transmission over the internet is not entirely secure, we cannot fully guarantee that your Personal Data will not be intercepted, accessed, disclosed, altered, or destroyed by unauthorized third parties due to factors beyond our control.

You are responsible for maintaining the confidentiality of your account details and must not share your account details, including your password and One-Time Password (OTP), with anyone. You must also always ensure and take responsibility for the security of the devices you use.

### Data Storage

Your Personal Data will only be stored as long as necessary to fulfill the purposes for which it was collected, for the retention period, or as long as storage is necessary or permitted by applicable regulations. We will cease to retain Personal Data, or remove its association with you as an individual, immediately once it is deemed that the purposes of collecting that Personal Data are no longer necessary, including upon your request to delete your account, and retention is no longer needed for business or legal purposes.

HWG will delete and/or anonymize Users' Personal Data under its control if (i) the Personal Data is no longer required to fulfill the purposes for which it was collected; (ii) the retention period has expired; and (iii) storage is no longer necessary for compliance with applicable legal provisions.

Please note that there may still be instances where some of your Personal Data is stored or controlled by other parties, including government institutions, in certain ways. In cases where we share your Personal Data with competent government institutions and/or other institutions designated by the government or cooperating with us, you acknowledge and agree that the storage of your Personal Data by those institutions will follow their respective data retention policies.

Data communicated between you and us conducted outside of the Website (such as through phone calls, SMS, mobile messaging, or other forms of communication and the collection of your Personal Data by our agents) may also be stored in various ways. Therefore, you and we are fully responsible for the Processing of that Personal Data.

To the extent permitted by applicable regulations, you release us from and against any and all claims, losses, liabilities, costs, damages, and expenses (including but not limited to legal fees and full indemnity expenses) arising directly or indirectly from any activities conducted outside our Website.

## YOUR RIGHTS AS A USER

### Your Legal Rights

You may have certain rights under applicable legislation to request us for access to, correction of, and/or deletion of your Personal Data that we control and possess. We may deny your request for access to, correction of, and/or deletion of some or all of your Personal Data that we control if permitted or required under applicable legislation. This includes situations where the Personal Data may contain references to others or where the request for access or for correction or deletion is deemed by us to be irrelevant, frivolous, fabricated, or related to violations of terms and conditions or laws.

In accordance with applicable legislation, we reserve the right to impose administrative fees for each request for access and/or correction.

### ADDITIONAL NOTE

### Websites and Other Services

Our website and marketing materials (as defined below) may contain links to websites operated by third parties. Any processing of Personal Data on such websites is fully controlled by third parties and is the responsibility of those third parties. If you agree to access third-party operated websites, you are subject to the terms and conditions and privacy notices of those third-party websites. Therefore, we recommend that you read the terms and conditions and privacy notices of those third-party websites to understand how they collect and use your Personal Data.



The advertisements on our website or marketing materials serve as links to advertisers' websites, and any data they collect based on your clicks on those links will be gathered and used by the relevant advertisers in accordance with their privacy policies.

## Marketing and Promotional Materials

We and our partners (including vendors, suppliers, merchants, and/or other third parties associated with us for commercial and/or non-commercial activities) may send you direct marketing, advertisements, and promotional communications via push notifications, in-app messages, mail, chat platforms, social media, and email ("**Marketing Materials**") if you have agreed to subscribe to our mailing list and/or agreed to receive marketing and promotional materials from us. You may opt out of receiving such marketing communications at any time by clicking the "unsubscribe" option in the relevant message, through other available methods on the promotional media, or by contacting us using the contact details provided below.

Please note that if you choose not to receive Marketing Materials, we may still send you non-promotional messages, such as receipts or information about your account.

## Updates to the Privacy Notice

We may review and change this Privacy Notice at our discretion from time to time to ensure that it remains consistent with our future developments and/or changes in applicable legal or regulatory requirements. If we decide to amend this Privacy Notice, we will notify you of such changes through our official channels. You agree that you are responsible for periodically reviewing this Privacy Notice to remain informed about our data processing and data protection practices, and that your continued use of our Application or website, communication with us, or access to and use of our services after any changes to this Privacy Notice will be deemed your acceptance of this Privacy Notice and any amendments.

## **CONTACT US**

### How to Contact Us

If users have any questions, comments, complaints, or claims regarding this Privacy Notice, or if users wish to access, request deletion, make corrections, or exercise other rights concerning their Personal Data, please contact HWG customer service through the page [www.hss.hwgroup.id](http://www.hss.hwgroup.id).