

Privacy Policy

SWINGBY LABS PTE LTD (“SWINGBY”) would not generally collect or retain personal information about its users but in the rare and limited circumstances that we do, we would only collect, use, and disclose information about you through our websites, including web applications, and other online products and services (collectively, the “Services”) or when you otherwise interact with us.

This Privacy Policy may be changed or amended from time to time, and if we make changes, we will notify you by revising the date at the top of the Privacy Policy or, if necessary, we may inform you with an additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to review the Privacy Policy whenever you access the Services or otherwise interact with us to stay informed about our information practices and the choices available to you.

1. Collection of Information

i. Information Provided by You

We may collect information you provide directly to us, such as information when you use the Services, fill out a form, engage in a transaction, communicate with us via third party social media sites, customer support or otherwise communicate with us. In such case, we may collect information such as your email address and any other information you chose to provide.

ii. Automatically Collected Information

When you access or use our Services, we may automatically collect information about you, including:

Log Information: this refers to information about your use of the Services, including the type of web browser you use, access frequency, pages viewed, and your IP address.

Device Information: this refers to the computer or mobile device you use to access our Services, including the hardware model, operating system and version, unique device identifiers, and mobile network information.

Information Collected by Cookies and Other Tracking Technologies: this refers mainly to cookies, which are small data files stored on your hard drive or in device memory that help us improve our Services and your experience, see which areas and features of our Services are popular and count visits, and web beacons are electronic images that may be used in our Services or emails and help deliver cookies, count visits and understand usage and campaign effectiveness. You may choose to disable cookies by referring to the paragraph on “Your Choices” below.

iii. Information We Collect from Other Sources

We may obtain information from other sources, including third parties, and combine that with information we collect through our Services.

2. Use of Information

We use the information we collect to provide, maintain, and improve our services. We may also use the information we collect to:

Notify you on technical updates, security alerts, support and administrative assistance and customer service requests;

Send you information about products, services, offers, and events offered by SWINGBY and others, and other news and information we think will be of interest to you;

Monitor and analyze trends, usage and activities in connection with our Services; and

Prevent, detect and identify fraudulent transactions and other illegal activities and protect the rights and property of SWINGBY and others.

3. Sharing of Information

We may share information about you as follows or as otherwise described in this Privacy Policy:

With vendors, consultants and other service providers who need access to such information to carry out work on our behalf;

In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law, regulation or legal process;

If we believe your actions are inconsistent with our user agreements or policies, or to protect the rights, property and safety of SWINGBY or others;

Between and among SWINGBY and our current and future parents, affiliates, subsidiaries and other companies under common control and ownership; and

With your consent or at your direction.

4. Advertising and Analytics Services Provided by Others

We may allow others to provide analytics services and serve advertisements on our behalf across the internet and in applications. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by SWINGBY and others to, among other things, analyze and track data, determine the popularity of certain content, deliver advertising and content targeted to your interests on our Services and other websites and better understand your online activity.

5. Security

SWINGBY takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

6. Data Retention

Information that we collect about you will be stored for as long as is necessary for the purposes for which we originally collected it for (that you have provided your consent to), or for other legitimate business purposes, including to meet our legal or other regulatory obligations.

7. Transfer of Information to Other Countries

SWINGBY may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it.

8. Resident of EEA

If you are a resident of the EEA, when we process your personal data we will only do so in the following situations: We need to use your personal data to perform our responsibilities such as to provide the Services you have requested), where we have a legitimate interest in processing your personal data. For example, we may process your personal data to send you marketing communications, to communicate with you about changes to our Services, and to provide, secure, and improve our Services, or where you have consented to the processing of your personal data for one or more specific purposes.

As a resident of the EEA, you have the right to access personal data we hold about you and to ask that your personal data be corrected, erased, or transferred. You may also have the right to object to, or request that we restrict, certain processing. If you would like to exercise any of these rights, you can contact us as indicated below.

As a resident of the EEA and have a concern about our processing of personal data that we are not able to resolve, you have the right to lodge a complaint with the data privacy authority where you reside. For contact details of your local Data Protection Authority, please see: http://ec.europa.eu/justice/data-protection/article-29/structure/data-protection-authorities/index_en.htm.

9. Your Choices

i. Account Information

You may request for any update, correction or deletion of information about you at any time by emailing us at contact@swingby.network. Please note that we may retain cached or archived copies of information about you for a certain period of time as required by local regulations.

ii. Cookies

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

iii. Promotional Communications

If you would like to opt out of receiving promotional communications from SWINGBY, please follow the instructions in those communications or by emailing us at contact@swingby.network. If you opt out, we may still send you non-promotional emails, such as those about your account or our ongoing business relations.

iv. Mobile Push Notifications/Alerts

With your consent, we may send promotional and non-promotional push notifications or alerts to your mobile device. You can deactivate these messages at any time by changing the notification settings on your mobile device.

10. Contact Us

If you have any questions about this Privacy Policy, please contact us at: contact@swingby.network

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