

Privacy Policy

Your privacy is important to Proasia Design and its affiliates and/or subsidiaries. Proasia Design developed this privacy policy (the “**Privacy Policy**”) to protect information we may collect when you use the DiveSync application on iOS or Android. (“**DiveSync**”). Please refer to the following provisions to understand how Proasia Design collects, processes, and uses, and under certain conditions, discloses, shares, or transfers your personal information and non-personal information. By using DiveSync, you agree to the provisions of the Privacy Policy and agree to authorize Proasia Design to collect, process, and use your personal data.

1. Identity, Collection, Processing and Use of Personal Data

1.1 Identity

In this privacy policy, the terms "we", "our", and "us" are used to refer to:

Proasia Design Co., Ltd.
No. 105, Xingde Rd., Sanchong Dist., New Taipei City, 24158 Taiwan

We are defined as the controller of your personal information and are responsible for using your personal data lawfully and in a transparent manner in full alignment with the Taiwan Personal Data Protection Act and other applicable laws and regulations.

1.2 Personal Data Collected on DiveSync

When you use DiveSync, you may transmit your data to us and therefore, reveal your personal information. (“**Personal Data**”). This would be the case when your Personal Data is sent to us for troubleshooting purposes. The types of Personal Data collected are as follows:

1. Code types of identification: C001 to C003, such as name, address, phone number, email, etc.
2. Code type of characteristics: C011, such as age, gender, date of birth, etc.
3. Code types of unclassified information: C132, such as mail, documents, reports or emails that are unable to be classified in other code types.

1.3 Purposes of Processing Personal Data on DiveSync

We process your Personal Data through DiveSync for the following purposes:

1. to be able to answer your queries;
2. to allow you to participate in interactive features on DiveSync and in relation to our services, when you choose to do so;
3. to administer DiveSync and for internal operations, including troubleshooting, testing, research; and
4. to comply with our legal and regulatory obligations and for the purposes of assisting with the prevention and detection of crime;
5. to answer your queries related to your rights.
6. Other specific purposes as stipulated in "Special Purposes of Personal Data Protection Act and Types of Personal Data" promulgated by the Taiwan Ministry of Justice (the "**Types Classification Guidance**") as follows:

- a. 040 "Marketing"
- b. 063 "Collection or processing of personal data under its legal obligations by a non-government agency"
- c. 069 "Contract, quasi-contract or other legal relation matters"
- d. 090 "Consumer, customer management and service"
- e. 098 "Business and technical information"
- f. 135 "Information (communication) service"
- g. 136 "Information (communication) and database management"
- h. 148 "Online shopping and other electronic commerce services"
- i. 152 "Management of advertisement or commercial act"
- j. 154 "Credit check"
- k. 157 "Investigation, statistics and research analysis"
- l. 181 "Other business in accordance with the business registration items or articles of incorporation"

2. Time Period, Area, Recipient, Method of Processing, and Use of Personal Data

1. **Time Period:** The duration of the specific purpose, as stipulated in Article 1 of the Privacy Policy and a reasonable period after the expiration of that duration, or the period specified in relevant regulations, laws, or contracts.
2. **Area:** Within the ROC, Taiwan, country, or region where the "recipient" provided in Paragraph 3 is located.
3. **Where Stored:** Personal Data is stored locally on your mobile device until you choose to send such data to us for troubleshooting purposes.
4. **Recipient:** Proasia Design, affiliates of Proasia Design, or third parties commissioned by Proasia Design to collect, process, or use Personal Data for your or Proasia Design's benefit, or vendors in collaboration with Proasia Design, such as product and service providers.
5. **Method:** In oral or written form (either hard copy or soft copy), telephone, text message, email, facsimile, electronic record, digital documents, appropriate manners which meet the current technology, or any other methods in accordance with relevant laws, regulations, and contracts.

3. Your Rights

According to Article 3 of the Taiwan Personal Data Protection Act, you may exercise the following rights with respect to your Personal Data:

1. For any Personal Data collected by Proasia Design, you may request Proasia Design to make available to you the original information and any duplicates for review.
2. You may request Proasia Design to supplement your Personal Data, discontinue collection, processing or use thereof, correct or delete incorrect Personal Data.
3. If you exercise these rights, please send supporting documents and a written request to Proasia Design at No.105 Xingde Rd, Sanchong District, New Taipei City 24158 Taiwan. In the event of a request to inquire, review or make duplicates of your Personal Data, Proasia Design will notify you in writing of its decision regarding the request within 10 business days of receipt.
4. You may also choose not to provide your Personal Data. However, you fully understand that if your Personal Data is not provided, Proasia Design may not be able to provide our products and services to you.

4. Protecting Your Personal Information

Proasia Design will take reasonable and appropriate measures to prevent your personal information from unauthorized or unlawful access, use, processing, or alteration, and from any breaches or loss of such personal information. Such measures may be implemented through use of a third-party service. Despite Proasia Design taking reasonable steps to use and improve various safeguards, you acknowledge and

agree that no system or technology is completely secure and safe. If you become aware of any vulnerability, please email info@proasiadesign.com.

5. Updates

Proasia Design may update or upgrade DiveSync periodically to provide you additional features, address technical issues, and enhance your user experience. DiveSync may include an automatic updates feature, which gives Proasia Design the ability to make updates automatically.

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