

Privacy Policy

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Innovative is committed to protecting your privacy. Our guiding principle toward data collection is to collect only the minimal data required to operate a world-class VPN service at scale. We want you to understand what information we collect, what we don't collect, and how we collect, use, and store information. We do not collect logs of your activity, including no logging of browsing history, traffic destination, data content, or DNS queries. We also never store connection logs, i.e., no logs of your IP address, your outgoing VPN IP address, connection timestamp, or session duration. We designed our systems not to have sensitive data about you; even when compelled, we cannot provide data that we do not possess.

1. (USER-CONTROLLED OPTION): PERSONAL INFORMATION

Our VPN APP is a non-obligatory log network. Innovative are not available for the information related to the personal information of users, including but not limited to names (subscriber names, user names and screen names), addresses (including mailing addresses, residential address, business addresses) and telephones, unless the data you provide depending on the context of your interactions with us and the choices you make, including your privacy settings, and the products and features you use for the purpose of administering your subscription and for the purpose to enjoy our VPN services. Except for the limited exceptions, we don't automatically collect any Personal Information from you.

When you open the APP seeking for our VPN services, the APP assigns a unique identifier to you for the service (such unique identifier just binds up with your device identification code, but does not tie to any other personal information of users). When you use the VPN services, we will check your account information through this unique identifier to determine the level of service you have signed up for before establishing your VPN connection.

With some forms of payment, certain Mac version of our VPN services may redirect you to the website of a third-party payment processor (namely PayPal) to complete the transaction. To understand what personal information the processor collects and stores, please refer to the respective

processor's terms and privacy policy. Therefore, except for the limited exception above, we do not know any means or source of user's detailed payment for VPN services (including any credit card or bank account number) or any billing records either.

If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide. We may also receive a confirmation when you open an email from us.

Innovative uses your email address (if any depending on your choice) for the following reasons:

- (1) To communicate with you about your VPN services or respond to your communications.
- (2) To send you updates and announcements.
- (3) To send marketing information, such as Innovative offers, surveys, invitations, and content about other matters in connection with Innovative ('Marketing emails').

You may choose to not receive Marketing emails by following the opt-out procedure described in these emails.

Innovative uses your personal information only for the purposes listed in this Privacy Policy, and we don't sell your personal information to third parties without your prior consent.

2. SERVICE INFORMATION RELATED TO YOUR VPN USAGE

Subject to applicable laws and for the avoidance to infringe any internet service provider, any browsing information, traffic destination, data content, IP addresses, DNS queries or other similar information relating to your online activities transmitted by you to our servers is encrypted and cleared after the VPN 'session' is closed. That said, we don't collect any information regarding the websites you visit or any data stored on or transmitted from your device, including any data that applications on your device may transmit through the VPN network. More specifically, Innovative has NO documents/information below under the situations of the limited connecting with your personal information and the non-

collection of the websites you visit or any data stored on or transmitted from your device:

(1) We do not know which user ever accessed a particular website or service.

(2) We do not know which user was connected to the VPN at a specific time.

(3) We do not know the set of original IP addresses of a user's computer or the temporarily assigned network addresses.

If anyone would like to access to or try to compel Innovative to release user information based on any of the above, we cannot supply this information because the data don't exist.

For the purpose to fulfill our contractual obligations in good faith and to make you enjoy excellent VPN services, we collect the following information related to your VPN usage:

(1) Information related to Apps and Apps versions

We collect information related to which Apps and Apps version(s) you have activated. It makes our Support Team efficiently find out and eliminate technical issues for you.

technical issues for you.

(2) Information related to Connection

We collect information about whether a VPN connection is successful on a particular day (but not a specific time of the day), to which VPN location (but not your assigned outgoing IP address), and from which country/ISP (but not your source IP address). The minimal information allows us to provide efficient technical support to you, such as identifying connection problems, providing country-specific advice about how to use our VPN services, and to enable our engineers to identify and fix network issues.

(3) The Size (in MB) of Data transferred (but not any website you visit or any data transmitted from your device)

We collect information regarding the total sum of data transferred by a given user. It is one of our service principles to provide unlimited data transfer, however if we notice that a user occupies more traffic than thousands of others combined, what influence other users to enjoy high-quality service, we may seek for the reason with the user.

(4) Anonymous Data for Network Diagnostics, Study and Analysis

When you become one of our users for the VPN services, with your permission, we collect minimal usage statistics and anonymized analytics data used for network diagnostics in our network operations tools, for the purpose to optimize network speeds and to let us identify problems related to specific apps, VPN servers, or ISPs. Learning and analyzing the statistics allows us to improve the quality of the services and the products. We ensure the information we receive is fully anonymized and cannot be tied back to individual users (i.e., we do not store which user sent which data, and we do not store IP addresses).

We will collect the following information:

(a) Diagnostic information about if and how a VPN connection attempt failed.

(b) Speed data.

(c) Crash reports, also without any personal identifiable information. These are handled in an anonymized form by third parties, dependent on the platform you are using.

On iOS, Apple's crash reporting can be turned off in iOS settings.

Conclusion

We collect minimal usage statistics to maintain our quality of service. Although we provide service to users improving the network speed, we can't uniquely identify any specific behavior of any user, because thousands of users share one same location simultaneously to enjoy surfing the internet and the usage pattern overlaps with thousands of other customers who also connected to the same location on the same day.

Regarding to the sensitive data, we've engineered our systems to categorically eliminate the storage of sensitive data. We never know HOW they have utilized our Service.

We stand by our firm commitment to our customers' privacy by not possessing any data related to a user's online activities.

3. THE USE AND SHARING OF INFORMATION

(1) How we use information

We use the information we collect in various way, including to:

- (a) Provide, operate, and maintain our Services;
- (b) Improve, personalize, and expand our Services;
- (c) Understand and analyze how you use our Services;
- (d) Develop new products, services, features, and functionality;
- (e) Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the Service, and for marketing and promotional purposes;
- (f) Process your transactions;
- (g) Send you text messages and push notifications;
- (h) Find and prevent fraud;
- (i) For compliance purposes, including enforcing our Terms of Service, or other legal rights, or as may be required by applicable laws and regulations or requested by any judicial process or governmental agency.

(2) How we share information

We may share the information we collect in various ways, including the following:

- (a) Vendors and Service Providers. We may share information with third-party vendors and service providers that provide services on our behalf, such as helping to provide our Services, for promotional and/or marketing purposes, and to provide you with information relevant to you such as product announcements, software updates, special offers, or other information.
- (b) Aggregate Information. Where legally permissible, we may use and share information about users with our partners in aggregated or de-identified form that can't reasonably be used to identify you.
- (c) Information We Share When You Sign Up Through a Referral. If you sign up for our Services through a referral from a friend, we may share information with your referrer to let them know that you used their referral to sign up for our Services.
- (d) Analytics. We collect minimal usage statistics and anonymized analytics data used for network diagnostics in our network operations tools. Please see more information in Section 2 of this Privacy Policy.

(e) **Business Transfers.** Information may be disclosed and otherwise transferred to any potential acquirer, successor, or assignee as part of any proposed merger, acquisition, debt financing, sale of assets, or similar transaction, or in the event of insolvency, bankruptcy, or receivership in which information is transferred to one or more third parties as one of our business assets.

(f) **As Required by Law and Similar Disclosures.** We may also share information to (i) satisfy any applicable law, regulation, legal process, or governmental request; (ii) enforce this Privacy Policy and our Terms of Service, including investigation of potential violations hereof; (iii) detect, prevent, or otherwise address fraud, security, or technical issues; (iv) respond to your requests; or (v) protect our rights, property or safety, our users and the public. This includes exchanging information with other companies and organizations for fraud protection and spam/malware prevention.

(g) **With Your Consent.** We may share information with your consent.

4. ADVERTISING

We do not server any ads for the VIP subscription of our services. As well, we are proud to offer free, advertising-supported VPN services to the customers. We work with third-party advertising partners to show ads to the customers who choose free VPN services.

We ensure that we do not target any personal information based on these ads. Although you opt in to use the free, advertising-supported VPN services, we won't share the advertisers any your personal information or any usage information without your prior consent.

Notwithstanding the foregoing, these advertising partners may set and access their own cookies, pixel tags, and similar technologies on our services, and they may otherwise collect or have access to information about you which they may collect over time and across different online services.

5. JURISDICTION AND APPLICABLE LAW

Keeping your information private is our core mission. Required by any foreign law enforcement agencies, Innovative turns over protected user information only upon receipt of a valid subpoena, court order, or search warrant, which shall be served effectively under the Rules of Court of Singapore. More specifically, we think the subpoena, court order or search warrant may lose its coercive effect when it crosses its boundary. It only regains coercive effect on the other side of the line either through a domestication action (in the other state's courts) or under the authority of a statute. Additionally, we will notify affected users about any requests for their account information, unless prohibited from doing so by law or court order. Should we receive a valid served legal order, it is important to note that Innovative does not collect any IP addresses, browsing history, traffic data, or DNS queries that could be used to identify any specific user.

6. DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax, or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

We keep records of any correspondence, questions, complaints, or compliments you submit to us, along with our response. Depending on how you contact us, we may collect your email address and any additional information you provide to us. Having full correspondence records enables us to provide the best possible customer support experience.

We use emails for support correspondence: ptlabslimited@gmail.com.

When you correspond with us using these emails, your correspondence records, including your name and email address, are stored in their systems.

7. SECURITY MEASURES

Innovative is committed to protecting your information. We use best-in-class physical, procedural, and technical security with respect to our offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of information. Access to user information is restricted to staff who require such access to perform their job functions.

While we believe these systems are robust, it is important to understand that no data security measures in the world can offer 100% protection.

Servers are housed in data centers with strong security practices. None of these data centers require us to collect or store any traffic data or personal information related to your use of VPN services. If any data center were to ask us to log such data, we would immediately cease operations with said data center and find alternative options.

Even if a government were to physically seize one of our VPN servers and manage to break its disk encryption, there would be no logs or information that would tie any individual user to a particular event, website, or behavior.

8. THIRD-PARTY SERVICES

You may access other third-party services while using the VPN services, for example by clicking on links to those third-party services from within the Services. We are not responsible for the privacy policies and/or practices of these third-party services, and we encourage you to carefully review their privacy policies.

9. CHILDREN'S PRIVACY

We feel under a particular obligation to protect information obtained from young children. We would strongly urge parents to instruct their children never to disclose their real name, their address or their telephone number while they are on-line without prior permission. Innovative does not knowingly collect information from children under the age of 16, and

children under 16 years old are prohibited from using our services. If you learn that a child has provided us with personal information in violation of this Privacy Policy, you can alert us at ptlabslimited@gmail.com

10. ACCESS

When you become one of our users for the VPN services, you may access certain information associated with you by emailing ptlabslimited@gmail.com If you decide not to use our VPN services any more, any public activity on your Account prior to deletion may remain stored on our servers and may remain accessible to the public.

To protect your privacy and security, we may also take reasonable steps to verify your identity before updating or removing your information. The information you provide us may be archived or stored periodically by us according to backup processes conducted in the ordinary course of business for disaster recovery purposes. Your ability to access and correct your information may be temporarily limited where access and correction could: inhibit our ability to comply with a legal obligation; inhibit our ability to investigate, make or defend legal claims; result in disclosure of personal information about a third party; or result in breach of a contract or disclosure of trade secrets or other proprietary business information belonging to us or a third party.

11. GDPR

Innovative is committed to user privacy globally, and personal information under users' control and minimal collection of data are our existing practices. According to the requirements of the General Data Protection Regulation (GDPR) of the European Union (EU), we collect and process the data in a specific manner of users in EU outlined in this Privacy Policy on one of the following bases, depending on the circumstances:

- (1) For the purposes of fulfilling our contractual obligations to users, including:
 - (a) Providing users with the VPN services and Apps they have requested.
 - (b) Managing user subscriptions and processing payments.
 - (c) Providing customer support.

(2) or a legitimate interest associated with the operation of our business, including: * Enhancing the quality, reliability, and effectiveness of our VPN Services, and Apps. * Communicating with customers to provide information and seek feedback related to our VPN services and Apps.

You can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect the processing of your personal information conducted in reliance on lawful processing grounds other than consent. As well, you have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing emails we send you.

You can exercise your rights under the GDPR to access, transfer, correct, delete, or object to the processing of your personal information by contacting us at ptlabslimited@gmail.com

12. INTERNATIONAL DATA TRANSFERS

Innovative is a global business. We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to other countries, we will protect that information as described in this Privacy Policy.

13. CHANGES TO THIS PRIVACY POLICY

For the purpose to consist with applicable privacy laws and principles, this Privacy Policy may be modified from time to time without prior notice to you, so please review it frequently. Your continued use of our VPN services constitutes your acceptance of our Privacy Policy. Changes to this Privacy Policy will be posted on our websites. If we materially change the ways in which we use or share personal information previously collected from you through our VPN services, we will notify you through our APP, email, or other communication.

14. Contacts

If you have any questions or concerns about this Privacy Policy, please feel free to contact us at ptlabslimited@gmail.com