
PRIVACY POLICY

Last Updated in January 2026

BIGO Ads (“we”, “us”, “our”) operates a platform for app developers and other businesses to automate and optimize the marketing and monetization of their platforms, products, or services by enabling the placement of different types of advertisements on digital properties including mobile apps, websites, and connected TV devices that integrate with our Software Development Kit (“SDK”), Application Programming Interface (“API”), any platform, services or technologies provided by BIGO Ads (collectively, the “Advertising Services” or “Services”).

This Privacy Policy (“**Policy**”) is subject to any service agreement between BIGO Ads (“**We**”) and you (as defined below) including BIGO Ads Partner Agreement. By using the BIGO Ads Service or BIGO Ads Site, you acknowledge that you have read, understood and agreed to this Privacy Policy. Please review this Privacy Policy before using the BIGO Ads Service or the BIGO Ads Site.

The Privacy Policy explains how we collect, use, and share information through our Services and advertising platform, and our website at <http://www.bigosp.com> (the “Website”).

THE INFORMATION WE COLLECT AND HOW WE COLLECT YOUR INFORMATION

Depending on the nature of a user’s (each a “User”) interaction with the BIGO Ads Services, or any service provided by BIGO Ads’s business partners, we may collect information directly from such User or from our business partners (e.g. mobile application developers, Ad Exchange platforms, demand side platforms, and advertisers).

1. If you are a consumer who uses a third-party mobile application, connected TV device or website (“Publisher Properties”) that integrate with BIGO Ads Software Development Kit (“SDK”) or otherwise interact with BIGO Ads Service through advertisements served within a digital property, we and/or our business partners may collect and/or process the following information: device make, device model, operating system (e.g. iOS) and the OS version of the device, device type (e.g. smartphone, tablet, etc.), screen size, orientation and battery, Resolution, Device dpi(Dots Per Inch) carrier information, GMS version, Web kit version, app version and characteristic of the app (such as App launch time, app running status) used by you when you interact with BIGO Ads’ Service, country, geolocation(such as longitude or latitude) or Coarse location(such as city) (if authorized by you and the operator of the Publisher Properties), time zone and locale settings (country and preferred language), network connection type, IP address, SDK version, timestamp, network status such as WiFi, mobile advertising identifier (e.g. Apple IDFA or Google advertising ID), device event information such as crashes, system activity, hardware settings, the date and time of your request and referral URL, cookies, user-agent, package name of the app of BIGO Ads’ business partners, IDFA, system file size, system update time, system boot time, device user name, RAM (random access memory), remaining available RAM, CPU version, HTTP header information, Advertising and tracking preferences and restrictions, interaction information with ads (including ad impression, ad clicks, and etc.). Publishers may choose to share with us additional information including your age or year of birth, gender, and interest segments for purposes of their own direct ad serving. Please refer to the applicable publisher’s privacy policy for more information about their use of first party data.

Advertisers (through the advertiser itself or through a third party service provider on behalf of such advertiser) may also share transactional or “event” data related to a consumer’s interaction with an application, such as information about the actions taken in an application like impressions, purchases or application installations.

2. If you are a consumer who interacts with the Services through an e-commerce platform or a merchant website, we may collect certain additional information (that you provided to the e-commerce platform or merchant, through a third party’s API, our SDK, pixel, or other similar technologies), including the following:

User IDs; Shopping browsing behavior (e.g., views) and search history; Records of products purchased or considered (e.g., added to cart, check out); Purchasing histories; and Information regarding user interactions with advertising partners and their merchant partners’ sites and advertisements.

3. In particular, where BIGO Ads acts as Demand Side Platform (“DSP”) serving ads to Ad Exchange, our business partners acting as our Ad Exchange may collect and share your personal information with us including those information as listed in the above sub-section 1 of this section.

4. We provide BIGO Ads Service for our business partners such as mobile application developers and advertisers. We may collect name, job title, email address, account name and password, IP address and address of individuals using BIGO Ads Services on behalf of our business partners, such as employees of our mobile application developers or advertisers. For the visitors of our website (including our business partner), we use cookies, web beacons, or other similar technology to collect information for various purposes, including interest-based advertising. This information may include your IP address, device identifier, browser type, device type, the date and time of your visit, and the areas of the Website you visit. You may be able to limit the use of cookies through your browser settings. Note that certain parts of the Website may not function properly without cookies. Additionally, you may still receive ads after limiting processing of information for interest-based advertising, but those ads may be less relevant to your interests.

5. We cooperate with reputational ad exchange platforms. The ad exchanged platforms may receive an ad request containing your personal information and transfer to BIGO Ads to build your profile, personalize your ad experience, and serve future ads you may see on the internet. Notwithstanding the foregoing, BIGO Ads will only collect your personal information which are transferred from our partnered Ad Exchange through their ad request. BIGO Ads will not collect any information beyond the scope of the information transferred from our partnered Ad Exchange through their ad request.

6. We access, preserve use and share your information to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal information but is not considered personal information as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature, to generate statistics about our users, or to calculate ad impressions served or clicked on.

7. We do not collect special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

HOW WE USE YOUR INFORMATION

We use the information we collect about you for the following purposes:

- a) to administer BIGO Ads Services (i.e. to provide BIGO Ads Services to you) and for internal operations, including troubleshooting, data analysis, measurement, testing, research, statistical and survey purposes (i.e. to guarantee BIGO Ads Services' stability and security) and to solicit your feedback;
- b) to identify your device and deliver relevant ads to you and to personalize the contents that you receive and provide you with tailored content that will be of interest to you;
- c) to provide you with user support and to improve, develop BIGO Ads Services and facilitate product development;
- d) to enable us and our advertising partners to provide ads that may be more relevant to your interests. Where required, our business partners (e.g. publishers) will obtain User consent for and on our behalf for our processing of User personal information for profiling and displaying ads, including personalized ads or behavioral ads, on a User's device. A User can withdraw their consent at any time;
- e) to enable our messenger service to function and to communicate with you;
- f) to help us detect abuse, fraud, and illegal activity on BIGO Ads Services;
- g) to review pictures, images and contents posted or generated on BIGO Ads Services to ensure that we comply with any applicable content regulations in any relevant jurisdiction;
- h) to enforce our terms, conditions, and policies; and
- i) to comply with other applicable laws and regulations.

We may also collect and use personal information of Users who are representing our business partners to use BIGO Ads Service (e.g. employees of our publishers or advertisers) for purpose of business contact and direct marketing (e.g. sending marketing emails). Where required, our business partner will obtain such Users' consent for and on our behalf for our processing of their personal information.

HOW WE SHARE YOUR INFORMATION

Advertising Partner. We may disclose the User's personal information to our business partners, including our advertisers, to report the measurement of the performance and effectiveness of ads that User see or interact with, including measuring the traffic quality in order to perform our contractual obligations to our business partners (e.g. advertisers), and to prevent fraudulent activity. These business partners may use the Users' personal information to measure Users' ad/site interaction and evaluate the performance and effectiveness of ads that User see or interact with, identify Users' interest areas, better understand the site and app traffic usage or User behavior in order to improve their services. Our business partners' use of the information that we disclose to them will be governed by their privacy policies.

Service Providers. We may also use third party service providers and other partners who support our business (e.g. cloud service provider, or those who analyze how our Services are used, measure the effectiveness of ads and services, provide customer service, or facilitate payments) to process the Users' personal information for purpose of ensuring systems and processes work properly and securely, and for purpose of data storage.

We may also share aggregate or anonymous information with other third parties in accordance with the terms of this Policy.

Affiliates. Our affiliates may also have access to Users' personal information for the purposes set out in this Privacy Policy.

Regulatory or Legal Requirements. We may share Users' personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when

we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property, or the rights, property or safety of others, including to advisers, law enforcement agencies, judicial and regulatory authorities.

Merger and Acquisition. We may also transfer Users' personal information to a third party that acquires all or part of our assets or shares, or that succeeds us in carrying on all or a part of our business, whether by merger, acquisition, reorganisation or otherwise.

Except for the above, we will not disclose or share with any third party your personal information, unless under the following circumstances:

- a) if we obtained your consent, either implied or express;
- b) if we are required to do so in order to comply with the applicable laws and regulations and government requests;
- c) if we believe in our good faith that this is necessary to protect the public interest;
- d) if it is necessary to do so to protect the safety and fundamental rights of another person;
- e) if it is necessary to address fraud, security, or technical issues; and
- f) if it is necessary to ensure the enforcement of our terms and conditions and the daily operation of BIGO Ads Services.

YOUR RIGHTS

You can opt-out from receiving interest-based advertising or behavioural advertising from BIGO Ads on supported devices following the guideline below.

Your iOS mobile device may provide a "Limit Ad Tracking" setting. On Android devices, your settings may allow you to "Opt out of Interest-Based Ads." When you have opted out using this setting on a device, BIGO Ads will not use in-app information collected from that device to infer your interests or serve ads to that device that are targeted based on your inferred interests.

Your mobile web browser may also provide a "Do Not Track" browser setting. When you have enabled this setting in your browser, BIGO Ads will not use mobile web browsing information from that browser to infer your interests or serve ads to that device that are targeting based on your inferred interests.

You can also make choices about data collection for certain companies by visiting an industry consumer choice platform such as the NAI (<https://optout.networkadvertising.org/>) or for users in the European Economic Area, the EDAA opt-out portal at <http://www.youronlinechoices.eu/>. You may still receive ads after limiting processing of information for interest-based advertising, but those ads may be less relevant to your interests.

RETENTION

BIGO Ads may retain the information relating to you collected from our business partners as necessary for the provision of the services, internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements (e.g. settlement). We will only retain your personal data for no more than two (2) years. The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

SECURITY OF YOUR INFORMATION

We take appropriate administrative, technical and physical security measures to safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of certain your personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information. Please be advised, however, that we cannot fully eliminate security risks associated with the storage and transmission of your personal information. You should use caution whenever submitting information through BIGO Ads Services and take special care in deciding which information you provide us with.

You are responsible for maintaining the secrecy of your password and account information at all times.

MARKETING

We may contact you periodically by e-mail to provide information regarding our products, services and content that may be of interest to you. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you decide at any time that you no longer wish to receive such communications from us, you may follow the unsubscribe instructions provided in any of the communications or request to be opted-out of receiving such communications via email to biz-cooperation@bigo.sg.

CHILDREN PROTECTION

BIGO Ads Services is not directly or mainly provided to children, and if you are under the age of 16 years old or other age of majority as required by the laws of the country of your domicile, you may not create a BIGO Ads account or use BIGO Ads Services. We have zero tolerance to any form of child abuse or exploitation. Your data (including private messages) may be shared with legal agencies if we in our good faith believe that you have engaged in child abuse, or if we are requested to do so by relevant legal agencies.

MODIFICATIONS

WE MAY MODIFY OR REVISE OUR PRIVACY POLICY FROM TIME TO TIME. ALTHOUGH WE MAY ATTEMPT TO NOTIFY YOU WHEN MAJOR CHANGES ARE MADE TO THIS PRIVACY POLICY, YOU ARE EXPECTED TO PERIODICALLY REVIEW THE MOST UP-TO-DATE VERSION FOUND AT BIGOADS SERVICES SO YOU ARE AWARE OF ANY CHANGES, AS THEY ARE BINDING ON YOU.

If we change anything in our privacy policy, the date of change will be reflected in the “last updated date”. You agree to note the date of the last revision to our privacy policy. Continuing to use our Service constitutes your consent to this Policy and any changes thereof. If you do not agree to any changes of this Policy, please stop using our Service.

NO ERROR FREE PERFORMANCE

We do not guarantee error-free performance under this privacy policy. We will use reasonable efforts

to comply with this privacy policy and will take prompt corrective action when we learn of any failure to comply with our privacy policy. We shall not be liable for any incidental, consequential, or punitive damages relating to this privacy policy.

CONTACT INFORMATION

Empathy Technology Pte.Ltd.
30 Pasir Panjang Road #15-31A
Mapletree Business City, Singapore 117440

If you have any questions about this privacy policy or our information-handling practices, please contact us at biz-cooperation@bigo.sg.

U.S. TERMS

If you are an individual in the U.S., the additional provisions below will be applicable to you.

CHILDREN PROTECTION

We are aiming to comply with the Children's Online Privacy Protection Act (COPPA). Our business partner, such as Publishers of apps, must enable the COPPA settings and confirm whether the App is directed to users under the age of 13 or not when using the BIGO Ads Services. If the Publisher's app or service is Primarily Child-Directed, then Publisher may not use BIGO Ads SDK. For the App which is targeted at mixed audience (Apps that are child directed, but do not target children as the primary audience), the Publisher will have to pass a flag to BIGO Ads SDK indicating the age of the users. This allows BIGO Ads to ensure that any persistent identifiers collected about Users of apps that are flagged as required will be processed according to the requirements of COPPA, including not being used to serve behaviorally-targeted ads or track users for such purposes. In addition, we will not knowingly collect any other personal information (such as the precise geo-location of Users' devices) from Users of Apps that we know are primarily directed to children under the age of thirteen (13).

If a parent or guardian becomes aware that his or her child has provided us with information without their consent, he or she should promptly contact us and we take reasonable steps to ensure that such information is deleted from our files.

California or other U.S. state Resident

In particular, if you are a California resident or a resident of U.S. states that have enacted comprehensive consumer privacy laws including Colorado, Connecticut, Virginia and Utah, you may request to know, disclose, access, correct or delete your data, collected in the last 12 months.

Know and Access your Personal Information

You may request, up to two times in a 12-month period, that we disclose to you the categories and specific pieces of personal information that we have collected about you, the categories of sources from which your personal information has been collected, the business or commercial purpose for collecting your personal information, the categories of personal information that we disclosed for a business purpose, any categories of personal information about you that we sold or shared, the categories of third-parties with whom we have shared your personal information, and the business or commercial purpose for selling your personal information, if applicable.

Request Deletion of your Personal Information

You have the right to request that we delete certain personal information that we may have collected from you.

Opt-Out of the “Sale” or “Sharing” of your Personal Information

We may “share” personal information about you for purposes of serving you with personalized ads or content, otherwise known as “interest-based advertising,” “targeted advertising,” or “cross-context behavioral advertising.”

You have the right to opt-out of any future “sales” or “sharing” of your personal information as defined by the applicable laws.

Non-Discrimination

You have the right to exercise the rights conferred on you by the applicable laws without discrimination.

Data Portability

You have the right to request that we transmit certain personal information that we may have collected from you to other entities, unless transmitting the information would not be technically feasible.

Correct Inaccurate Information

You have the right to request that we correct errors or inaccurate information in the personal information that we may have collected from you.

Opt-Out of Sharing for Cross-Contextual Behavioral Advertising

You have the right to opt-out of the “sharing” of your personal information for “cross-contextual behavioral advertising,” often referred to as “interest-based advertising” or “targeted advertising.” You may refer to “YOUR RIGHTS” in the above Policy for more details in regard of opt-out guidance.

Limit the Use or Disclosure of Sensitive Personal Information

In certain circumstances, you have the right to limit the use of any sensitive categories of personal information. As noted above, we do not collect or seek to elicit sensitive categories of personal information.

Opt-Out of the Use of Automated Decision Making

In certain circumstances, you have the right to opt-out of the use of automated decision making in relation to your personal information.

You will need to send an email to biz-cooperation@bigo.sg if you wish to make such request, and format the subject line as Identification of personal information+Californian+Your BIGO Ads ID. We may ask you to go through a verification process, such as using your phone number and an instant pin, before we respond to your request. Please note that we will not be able to handle this kind of request if submitted through postal mail, telephone, or facsimile.

Users domiciled in California are encouraged to designate an authorized agent to exercise their rights of privacy on their half.

EEA & Switzerland

If you are an individual in the European Economic Area (“EEA”) and/or Switzerland, the additional provisions below will be applicable to you.

INTERNATIONAL TRANSFERS

When you are located in the EEA, personal information collected from you, including through our BIGO Ads Service, will be transferred to recipients in countries located outside the EEA, including in Singapore, US and countries which may not be decided by the European Commission that it provides an adequate level of protection to personal information. Where required by law, the publisher and/or advertiser will obtain your consent to the transfer of your personal information to our business partners, BIGO Ads’s affiliates, and/or any recipients as described in this Privacy Policy, which are located outside the EEA. You may withdraw your consent at any time.

YOUR RIGHTS

You have the following rights with respect to our collection of the Personal Information we collect about you. We will respond to your request consistent with the applicable laws as soon as practicable, normally within one month, after proper verification procedures. Your exercise of these rights is usually free of charge, unless we deem it is chargeable under the applicable laws. We WILL NOT DISCRIMINATE due to your exercise of any right to privacy.

You can opt-out from receiving interest-based advertising or behavioural advertising from BIGO Ads on supported devices by referring to “YOUR RIGHTS” in the above Policy in regard of opt-out guidance..

Right to access. You may submit a request to access the Personal Information we collect about you by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz-cooperation@bigo.sg.

Right to rectification. You may allow you to “Opt out of Interest-Based Ads.” When you have opted out using this setting to submit a request to rectify the Personal Information we collect about you by (a) using Help or Feedback function on a device, BIGO Ads Services; or (b) by sending your request to us via email at biz- cooperation@bigo.sg.

Right to erasure. You may submit a request to erase the Personal Information we collect about you by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz-cooperation@bigo.sg. Though we cannot guarantee a complete erasure of your data that have been stored in our backup servers, we promise that we will not use in-app the data within the backup servers for any other purpose.

Right to data portability. You may ask us to transfer some of your Personal Information, if it is collected on the basis of your consent, in structured, commonly used and machine-readable formats to you or other environments designated by you, if technically feasible, by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz- cooperation@bigo.sg.

Right to withdraw consent. You may withdraw your consent and ask us not to continue to collect or process your Personal Information at any time if that information collected from that device to infer your is collected on the basis of your consent by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz- cooperation@bigo.sg. Your exercise of this right will not affect the processing activities occurred before your withdrawal.

Right to restrict processing. You may request us to stop processing your Personal Information if you believe such information is collected unlawfully or you have other particular reason for wanting the restriction by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz-cooperation@bigo.sg. We will examine your request and respond accordingly.

Right to object. You may object to the processing of any Personal Information we collect about you, , at any time by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz-cooperation@bigo.sg. Please note that we may reject your request if we demonstrate compelling legitimate grounds for the processing, which override your interests. and freedom or the processing is for the establishment, exercise, or defense of legal claims.

Right in relation to automated decision making and profiling. You may ask us to stop automated decision making or profiling you if you believe such automated decision making and profiling has legal or similarly significant effect upon you by (a) using Help or Feedback function on BIGO Ads Services; or (b) by sending your request to us via email at biz-cooperation@bigo.sg. We will examine your request and let you know if your request is applicable under the relevant laws and regulations.

In addition to the foregoing rights, you also have the right to lodge complaints before the competent data protection authority (“DPA”), usually the DPA of your home country.

CHILDREN PROTECTION

We are committed to protecting the privacy of users under the age of consent in the relevant countries (“Young User”). BIGO Ads Services is not directed to Young Users.

If you believe that we have inappropriately collected Personal Information from a Young User, please contact us at biz-cooperation@bigo.sg.