

# Privacy Policy

## I. Policy Scope

This Privacy Policy (“Policy”) describes the procedures regarding the collection, use, disclosure, and protection of personal data of the clients (“you” or “your”) who use our Site and Services.

This Policy covers your privacy rights and how we maintain safe business operations with our clients. By using our Services, you consent to collecting, using, and sharing your information as per this Policy.

You should not use our Services if you do not agree to any or all of this Policy’s terms, including other arrangements that supervise your use of our Services.

## II. Definitions

The definitions of terms applicable to this Policy are as follows:

- A. **“Account”** refers to the individual Client account you created with us to access and use our Services.
- B. **“Cookies”** refer to tiny text files or code pieces stored on your browser when accessing our Site.
- C. **“Data subject”** refers to the individual or group of users whose personal data we obtain and process.
- D. **“Personal data”** refers to any information we may use to confirm the Client’s identity. Such information does not include encoded or anonymous data or public information that has not been combined with non-public information.
- E. **“Process”** or “processing” refers to all activities related to our use of your personal data, such as its collection, storage, use, disclosure, restriction, erasure, blocking, and disposal.
- F. **“Sensitive personal data”** refers to information that qualifies as “personal data,” including **a.)** states race and personal beliefs, **b.)** health or social security benefits, and **c.)** information about administrative or criminal proceedings other than in the context of pending legal proceedings.

## III. Collection of Personal Data

We process various types of personal data, as categorized:

- A. **Identification:** your complete name, username, identity cards, similar IDs, date of birth, gender, and marital status

- B. **Contact:** your billing address, home address, email address, and phone numbers
- C. **Financial:** your bank account information, payment information, and credit card information
- D. **Technical:** your IP address, account login details, browser type, plug-ins, domain names, time zone setting, location services, operating system, personal devices, and other means you use to access our Site
- E. **Profile:** your Account username and profile, service preferences, and feedback you may have provided

Some of the information mentioned above may not be deemed as personal data when such information is not personally identifiable to you. With this, you agree and permit us to use, disclose, and share your personal data with our business partners and the relevant third parties.

You also understand and accept that we can process your personal data for more than one purpose, provided that your information was submitted on your own accord or obtained with your consent. Such a purpose includes allowing us to disclose your personal data to other affiliates through the Site.

Disclosing your information may be essential for official corporate matters, legal compliance, protecting our and other involved parties' rights, and further improving our Services.

In addition to collecting personal data, we do not knowingly gather information from minors, where our Site and Services only apply to users 18 years old and above. Users below the mentioned age are not allowed to access our Site and use our Services. If we identify a minor or have unintentionally collected data from an underage person, we have the right to block access and dispose of the obtained data immediately.

## IV. Processing of Personal Data

We usually collect personal data when you register for an account, request support, take a survey, reach out to us, or engage in other particular activities on our Site.

You will decide whether to proceed with any activity requiring your personal data. However, we may not be able to complete some transactions if you choose not to submit the necessary information.

Furthermore, we may combine your personal data with information obtained from other parties or that we already have for purposes indicated below. Any use of your personal data for purposes beyond what was stated in this Policy will require your consent.

We process your personal data for purposes such as:

- A. Provide, test, improve, promote, and customize our Services
- B. Provide new Services to you
- C. Address your inquiries, requests, concerns, or comments

- D. Allow you to customize our Services and choose what you prefer to access or share with a third party
- E. Notify you about amendments or updates to our Services, Site, or policies
- F. Determine and analyze usage trends and effectiveness of our campaigns
- G. Operate and maintain the quality of our Services, and obtain statistics about the use of our Site
- H. Provide technical and other support to maintain the security and efficiency of our Services
- I. Practice Know-Your-Customer (“KYC”) policy and other relevant legal compliance
- J. Notify you about special offers and promotions related to events, and invite you to participate in surveys based on your preferred Services

## V. Third-Party Disclosure

Submitting our personal data to our Site means you allow us and consent to the disclosure and transfer of your information to our business partners, affiliates, or third-party vendors and service providers.

We may disclose your personal data to certain parties for storage, legal compliance, billing, payment processing, customer support, analytics, performance monitoring, email deployment, hosting, and data processing. Such third parties include:

- A. Campaign affiliates
- B. Third-party providers, including those that help our Site’s operation
- C. Service providers, including IT and system administration services
- D. Bankers, auditors, lawyers, insurers, and other professionals providing consultancy in finance, legal, insurance, and accounting
- E. Marketing and database providers
- F. HR and finance system providers

Disclosing your personal data directly to our public message boards may risk the unauthorized collection and use of your information by others. You should review the separate privacy policies of websites where you submit your information, including websites linked to us, and understand how those websites obtain, use, and share your personal data. We are not responsible for privacy practices, activities, and contents outside our Site.

Furthermore, we are not obligated to disclose the following information:

- A. **Name and other information of investors:** individuals, corporations, or organizations

- B. **Company business arrangements:** its internal operations and transactions such as its mergers, restructuring, consolidation, or bankruptcy information
- C. **Business transactions:** the Company and its third-party affiliates' investment sales, lease, exchange, consummation, or transfer of securities

## VI. Disclosure to Non-EEA Countries

We have the right to disclose and transmit your personal data to other jurisdictions aside from where the Company currently operates and the country where you reside.

Suppose you are originally or currently located within the European Economic Area (“EEA”), and your personal data is required to be processed outside EEA. In that case, we will adopt the appropriate measures to ensure your data’s safety, subject to your legal rights and remedies.

When we disclose your personal data to state or federal authorities to comply with a legal obligation, our control over such processed or transmitted data may be limited.

## VII. Third-Party Services

The Site may contain third-party services from the relevant providers, including analytical companies or businesses that develop and post advertisements on the platform. These third-party services may use Cookies, pixel tags, and similar technologies with separate privacy policies.

## VIII. Cookies

When you visit our Site or use our app on your mobile device, the page will ask you to accept or decline Cookies.

By accepting Cookies, you allow the Site to customize your online experience and permit us to collect and record your browsing information, including the date and time of your visit and how you use our Site and Services.

Note that we do not use Cookies to run programs or applications that may harm your device. Cookies are unique and can only be read by our server in the domain that issued the cookie to you.

We only use Cookies to see how the Site is used and identify parts of it that may need improving or updating. Our Cookies may also be used to provide you with advertisements that fit your interests.

The Cookies we use are as follows:

- A. **“Strictly-Necessary Cookies”** are required for the Site to function correctly. With these, you can sign in to our portal, save your settings and language preferences, navigate back and forth between pages, and keep your previous actions from the same session.

- B. **“Performance Cookies”** or analytics Cookies help us collect statistical data about Site use. Such information is essential for optimizing the Site’s performance.
- C. **“Functional Cookies”** provide more functionality for the Site’s visitors. These functionalities include live chat services, online videos, and social media sharing buttons. These cookies can be implemented by our external service providers or the Site itself, while the functionalities may or may not be carried out when you accept them.
- D. **“Advertising/Tracking Cookies”** are set by our advertising partners and used for profiling and monitoring data across websites. Accepting these cookies may show our advertisements on other websites according to your profile and preferences. Moreover, these cookies save information regarding the number of visitors who viewed or clicked on our advertisements to optimize campaigns.

Many browsers automatically accept Cookies, but you can change your browser settings to reject Cookies if you prefer. Although you can decline the Cookies on our Site, some features may not work correctly or as intended.

## IX. Data Retention

We will retain your personal data for as long as it is necessary for processing, including when complying with legal obligations.

If you have not used our Services for a year, your account will be considered inactive, and your personal data could be subject to deactivation or deemed outdated.

## X. Changes to this Policy

This Policy is subject to occasional changes and updates without prior notice, effective immediately. Therefore, we recommend you review this Policy from time to time when visiting the Site to keep updated with the terms and our privacy practices.

## XI. Rights as a Data Subject

You can exercise the following rights as a data subject:

- A. **Right to be informed:** You have the right to be informed of **a.)** the types of personal data you need to provide, **b.)** the methods of processing your data, **c.)** the purposes and significance of processing your data, **d.)** the duration of storing your personal data and the basis for such length of period, **e.)** the receivers of your personal data, including individuals, groups, and jurisdictions outside EEA, and **f.)** your rights as the data subject.

- B. **Right to access:** You have the right to access the information about the processing of your data, such as **a.)** the contents of your processed personal data, **b.)** the date your data was last accessed and modified, **c.)** the source of your collected personal data, and **d.)** the reasons of disclosing your personal data.
- C. **Right to rectify:** You have the right to rectify your personal data and request us its modification if any of your information is false, inaccurate, or outdated.
- D. **Right to object:** You have the right to object to processing your personal data. We will immediately discontinue using your data upon your withdrawal of consent. However, we have the right to continue using and storing your data if its purpose outweighs your rights and interests.
- E. **Right to erasure:** You have the right to erasure when **a.)** your personal data is no longer needed for its original purpose for processing, **b.)** your personal data is being processed for purposes you did not authorize, **c.)** your data is false, incomplete, or outdated, **d.)** your data was unlawfully obtained or processed, **e.)** you withdraw your authorization to process your data, and there are no legal grounds or overriding reasons to use it, and if **e.)** the erasure of your data is needed to comply with a legal obligation.
- F. **Right to limit process:** You have the right to limit the processing of your personal data when **a.)** your data was unlawfully processed, but you do not intend to have it removed and instead opt for its process restriction, **b.)** you did not consent to the specific purpose it was processed, **c.)** your data is not needed anymore for the primary reason it was collected, but you still need it stored for legal reasons, and **d.)** you requested your data's modification, and we need to limit its use while reviewing such changes.
- G. **Right to data portability:** You have the right to data portability upon request to obtain and electronically move, copy, or transfer your data to another controller.