



Wallex Technologies International Limited Privacy Policy



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1. Introduction

We are Wallex Technologies International Limited (referred to as the “**Wallex**”, “**we**”, “**us**”, “**our**”, or “**the Company**”) and are committed to protecting our stakeholders’ and customers’ personal data in accordance with the Personal Data Protection Act 2012 of Singapore (“PDPA”) and other applicable data protection laws. We value your privacy, and as such, are committed to managing your Personal Data entrusted to us with the protection it deserves. This notice applies to the Personal Data collected in the Company’s website, the Company’s social media and customer communication channels, the Company’s mobile application, and any services accessed by you through our website, mobile application, social media or customer communication channels.

2. Purpose of this Notice

This privacy policy (“**Privacy Policy**” or “**Notice**”) describes how Wallex and its affiliates (each a “**Group Affiliate**” and collectively “**Wallex Group**” or the “**Group**”), collect, use, store and protect Personal Data. The Privacy Policy also describes how you can control the personal data that we collect from you and hold for you, as well as your rights on your personal data, where applicable. Please note that this Notice will be supplementary in addition to any other consent you may have given to us in connection to your Personal Data. In the case where a Group Affiliate is subject to additional obligations regarding stakeholders’ and customers’ personal data, please also refer to the separate privacy policy addendum of such Group Affiliate (if any) (together with this Privacy Policy (the “**Full Privacy Policy**”).

We may from time to time update the Full Privacy Policy to ensure that it is consistent with future developments, industry trends and/or any changes in legal or regulatory requirements or as we deem appropriate. Such changes will be published here and effective upon publication. Please check the Full Privacy Policy regularly for updated information/version. Your continued access and/or use of our website, our portal, our mobile application, our products and/or our services and your submission of any contact details to us through any channel whatsoever will constitute your agreement to the Full Privacy Policy and any revisions thereto.

3. What is Personal Data?

“**Personal data**” means any data about an individual who can be identified from that data, whether or not that relevant data is correct, as more specifically defined under the PDPA and other applicable data protection laws. Some examples include, without limitation –

- Personal identification information including but not limited to your name, official identification (such as passport, national identification number, photocopies of your identification documents, driver’s license, work permits and residency cards), photo, nationality, gender, date of birth, telephone number(s), postal address, e-mail address and biometric information;
- Bank transaction information such as your bank account details, the merchant or ATM’s location and additional details about them; date, time and transaction amount, payment instrument, details of foreign currency exchange, details of cross-border transactions and detailed



information of any electronic money exchange between the sender and the receiver such as name, date, time, location, IP address and information about the device used to process the transaction;

- Information that can enhance your overall user experience and enhance fraud management of the product, including your device's operating system and platform, browser type and version, plug-ins, device type, unique device identifier, GPS data, location data, web or mobile analytics such as clickstream and page interaction data; and
- Following information would only be accessed if you have given consent when the Company sought your permission with the mobile application: content information stored on your mobile device, contact information from your address book, digital contents and login information.

In order to process, administer and / or manage your relationship and / or account with us, it may be necessary for us to collect, use, disclose and / or process your Personal Data or other personal information. These may include those listed in our products or services application form(s), which may have been submitted via e-mail, website, mobile application or any other method.

4. Information that we collect from you

We collect, use, store and transfer different kinds of personal data about or relating to you, including but not limited to the following:

a) **Identity and contact data**, which

- if you act in your individual personal capacity: your name, passport or other unique identification number, telephone number, mailing address, email address, social media profile information, images / copies of your passport or identification document, your likeness (including photographs of yourself and other biometric information), utility bill or driving license;
- if you are a shareholder, beneficial owner, director, employee, guarantor and authorized representative ("Relevant Individual") of a corporate customer: your name, passport or other unique identification number, telephone number, mailing address, email address, social media profile information, images / copies of your passport or identification document, your likeness (including photographs of yourself), utility bill or driving license;

b) **Financial data**, which

- includes information about your financial position, status and history, and payment account details (such as bank, credit, payment or other payment details)

c) **Transaction data**, which

- includes details about fiat currency transfers, as well as issuance, transfer, administration, settlement, custody and recording activities in respect of security and payment tokens to, from and amongst your accounts with us;

d) **Technical data**, which



- includes details about the devices and technology you use including internet protocol address, your login data, and other technology on the devices you use to access our website, mobile application, products and/or services; and/or
- e) **Usage data**, which
- includes information about how you use our website, products and/or services, including cookies, IP addresses, and account details.

5. How we collect information from you

We collect personal data from or relating to you in various ways, including but not limited to the following:

- a) when you access and/or use or submit information to our websites, mobile applications (collectively the “**Business Channels**”), our verified channels with social media (collectively the “**Social Media Channels**”), products and/or services (or part thereof);
- b) when you submit forms in or relating to our website, mobile application and/or any of our products or services;
- c) when you register to attend any of our in-person events or webinars;
- d) when you post, publish, transmit, or upload content on our business and social media channels or through our services;
- e) when you register for, use or access any of our social media channels, services on business channels owned and/or operated by us or when you register as a member of the business channels owned and/or operated by us, or use services on such business channels owned and/or operated by us;
- f) when you interact with our personnel such as customer service officers, marketing representatives and agents;
- g) when you request that we contact you;
- h) when you ask to be included in an email or other mailing list;
- i) when you respond to our promotions and other initiatives;
- j) when you enter into agreements or business relations with us;
- k) through other publicly available sources and third parties (such as your demographic or contact information that may be used to verify you or your business, or to assess fraudulent activity);
- l) when you choose to provide your data through the use of MyInfo;
- m) when we receive references from business partners and third parties, for example, where you have been referred by them; and/or
- n) when you submit personal data to us for any other reason.

6. Purposes for the Collection and Use and Disclosure of Personal Data

Generally, Wallex collects, uses and/or discloses personal data, and you consent to such collection, use and/or disclosure by Wallex, for the following purposes:

- a) to process your application, including but not limited to verifying your identity and evaluating your financial and legal track record, for our goods or services;
- b) to provide products and services to you, including administering and / or managing your relationship or account with us;
- c) processing and / or dealing with any of your request and any necessary investigations relating to your request;
- d) carrying out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or by us;
- e) carrying out your instructions or responding to any of your enquiries;
- f) requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to improve and design our products, understand customer preferences and market trends, and to review, develop and improve the quality of our products and services;
- g) to communicate with you on matters relevant to your relationship with or interest in us;
- h) pre-emptively detecting and/or investigating fraudulent conduct, misconduct, unlawful action or omission, and any suspicion of the aforementioned, and analyse and manage other commercial risks;
- i) to fulfil the contractual/legal obligations under the contracts or other legal arrangements entered into between us and you;
- j) to protect and enforce our contractual and legal rights and obligations;
- k) to conduct audits, reviews and analysis of our internal processes, for action planning and managing commercial risks;
- l) to manage the safety and security of our premises and services (including but not limited to carrying out closed-circuit television surveillance and conducting security clearances);
- m) to comply with any applicable rules, laws and regulations (including any laws and regulations relating to anti-money laundering, countering the financing of terrorism / proliferation financing, and tax reporting obligations), codes of practice or guidelines or to assist in law enforcement and investigations by relevant law enforcement agencies, regulatory authorities and other governmental agencies, anywhere in the world;
- n) to provide such personal data to issuers on our platform and/or their financial intermediaries (where applicable) to allow them to comply with any applicable rules, laws and regulations (including any laws and regulations relating to anti-money laundering, countering the financing



- of terrorism / proliferation financing, and tax reporting obligations), codes of practice or guidelines or to assist in law enforcement and investigations by relevant law enforcement agencies, regulatory authorities and other governmental agencies (including tax authorities);
- o) to provide such personal data to financial institutions and other agents or service providers, in connection with refunds or erroneous transactions; and
 - p) any other purpose relating to any of the above.

We may also use and process your Personal Data for other marketing and promotional related purposes such as via post, email, telephone call, SMS, mobile app notification, website, and/or online messaging service (“**Additional Purposes**”):

- a) to assess and improve the products and services that you use or may use;
- b) to selectively send you information about our products, services, activities and/or events that may be relevant to you;
- c) providing or marketing services, products and benefits to you, including promotions, loyalty and reward programmes;
- d) to conduct research, surveys and data analysis relating to or with a view to enhancing any service or product provided by us (whether conducted by Wallex or jointly with another party) which may be relevant to you (“**Research Purpose**”); and
- e) matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by Wallex or other third parties.

We may share personal data with our regulators, related corporations, services providers, agents and other third parties for the purposes set out above and any other reasonable ancillary purposes, for legal reasons and regulatory purposes, or where permitted under the PDPA and other applicable laws, such as in response to law enforcement agencies.

If we transfer personal data to countries outside Singapore, it will be done in accordance with the relevant provisions under Singapore laws and regulations. We will also comply with the relevant laws and regulations in relation to transfers of personal data outside countries where the personal data is collected.

7. Disclosure of Personal Data

We will take reasonable steps to protect your Personal Data against unauthorised disclosure. To the extent permitted by law, we may transfer or disclose your Personal Data for the above Purposes and Additional Purposes stated in this Notice, to the following entities or parties, whether they are located overseas or in Singapore:

- Wallex Group of companies;
- Counterparties and their respective financial institutions in relation to payments and other transactions;



- Agents, contractors or third party service providers who provide operational services to Wallex Group, including but not limited to courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to Wallex Group;
- Vendors or other third party service providers, including but not limited to advertisers and event management companies, in connection with promotions and services offered by Wallex Group;
- Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- Co-branded and other business partners; and/or
- Any other party to whom you authorise us to disclose your Personal Data to.

8. Accessing your Personal Data and Correction Requests

It is your responsibility to ensure all Personal Information that you submit to us is complete, accurate, true and correct. Please update your personal data immediately if it changes or is inaccurate.

Should you wish to access a copy of or request for correction of your Personal Data held by us, you can submit your request via email to us at contact@wallextech.com. Alternatively, you can mail us at:

Mail: 15 Playfair Road, Level 2, Singapore 367987

Please note that we may need to ask for your identification number and other necessary details during the process to verify your identity. We reserve the right to refuse your requests to access and/or correct your Personal Data for reasons permitted by law.

We reserve the right to reject any update/correction requests if we have reasonable grounds to believe that such an update/correction should not be made.

9. Acknowledgement and Consent

By providing your Personal Data to us, using our website or mobile application, or signing up for or accessing products or services we offer during any of our interactions, either directly with us or through our agents and / or partners, you are consenting to the following:

- a) The Company may collect, use, disclose and / or process your Personal Data for the Purposes and Additional Purposes as described above;
- b) The Company may collect Personal Data about you from sources other than yourself and use, disclose and / or process the same for one or more of the Purposes and Additional Purposes as described above; and
- c) The Company may disclose your Personal Data to our third party service providers or agents (including its lawyers / law firms and consultants) for the Purposes and Additional Purposes as described above.



10. Telephone Calls, E-mails and Text-Based Enquiries

To continuously improve our service, all communications between you and the Company, whether made via telephone calls, e-mails and / or text-based modality may be recorded and monitored.

11. Withdrawal of Consent

You may communicate your objection to our use and / or disclosure of your Personal Data for any of the Purposes or Additional Purposes as stated in this Notice at any time by contacting our Data Protection Officer (“DPO”) using the contact details stated in the above. However, please take note that depending on the nature and specifics of your objection, we may not be able to continue to provide our products or services to you or perform on any contract we have with you.

12. Third Party Data

Where you disclose personal data of other individuals to us, **you warrant that such individuals have consented** to us collecting, using and / or disclosing such personal data for: (i) the relevant purpose for which you made the disclosure or as was notified to you at the relevant time; and (ii) the other purposes as described above in this Privacy Policy.

13. Marketing Communications

It is in our legitimate interests to process personal data to selectively contact you and / or send you information about our products, services, activities and / or events that may be relevant to you by email or short messages received through number-based messaging platforms (“**Marketing Communications**”). However, to the extent that these Marketing Communications are addressed to a Singapore telephone number that is for your personal use, you have the right to deny or withdraw your consent to receive such Marketing Communications. You may also register your Singapore telephone number on the Do Not Call Registers kept and maintained by the Personal Data Protection Commission (“PDPC”) if you do not wish to receive any Marketing Communications via your Singapore telephone number permanently. In the case of all other Marketing Communications sent to you not using a Singapore telephone number, you may unsubscribe from such Market Communications by using the unsubscribe link contained in the relevant email or short message, or by contacting us at contact@wallextech.com.

To the extent that our processing of your personal data for Marketing Communications is subject to the European General Data Protection Regulation (“GDPR”), you have the right to object to such processing by us. Please email contact@wallextech.com if you wish to exercise this right.

14. Cookies

When you browse our websites or use our mobile applications, social media channels or customer contact channels, we and third parties whom we partner may use cookies, tags, scripts, web objects, advertising identifiers (such as mobile device identifiers including but not limited to Apple’s IDFA or



Google's Advertising ID) and similar technology ("Cookies") to collect and store information about how you use these websites or mobile applications in order to improve the quality of service provided to you. Cookies may transmit information about you and your use of our service, including but not limited to your IP address, browser/device type, website or mobile application browsing history and time spent on our website or mobile application to the Company and our partners. Cookies enable the Company to provide and develop a more personalized browsing and usage experience on our website and mobile application, and improve the experience of displaying targeted advertising to you.

The Company may allow third parties to use Cookies on our website and mobile application to collect the same type of information. Third parties may be able to associate the information they collect with other additional information they collected about you from other sources. We do not necessarily have access to or control over the Cookies they use.

The Company may share non-personally identifiable information about you with third parties, such as advertising identifies, location data, or encrypted account identifier to improve the experience of displaying targeted advertising on platforms including but not limited to search engine and social media channels.

Depending on the type of cookie involved, it may be stored persistently or only during an individual user session. You may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser, if you do not wish your Cookies to be collected. You may also be able to limit our sharing of some of this information through your mobile device settings.

15. Retention of Personal Data

We retain personal data about or relating to you for as long as is necessary for the purposes for which such personal data was collected (including the purposes stated in section entitled "**Purposes for the Collection, Use and Disclosure of Personal Data**" and "**Additional Purposes**" above), and take reasonable measures to destroy any personal data that is no longer necessary to meet those purposes.

16. Security measures

All personal data is kept confidential and we take all reasonable measures to protect it from unauthorised or accidental access, misuse, disclosure, alteration, processing or loss, by implementing appropriate physical, electronic, administrative and supervisory controls.

17. Contact Us

You may want to contact us via email at contact@wallextech.com if you have any questions, queries, feedback or complaints relating to personal data protection. This includes (not limited to) if you:

- want to be removed from our customer database;
- do not want us to collect, use or disclose your personal data for any Research Purpose;
- believe we have inaccurate information about you and you want to correct such data; or
- wish to lodge a formal complaint with the relevant authority.



Your rights regarding your personal data

Under the Singapore Personal Data Protection Act, you may have the following rights:

- (a) access to your personal data such as your full name, unique identification number, residential address, date of birth and nationality;
- (b) rectification of such personal data; and
- (c) lodge a complaint with the Personal Data Protection Commission in Singapore;

To the extent that our processing of your personal data is subject to the European GDPR, you may have the following rights:

- (a) access to your personal data;
- (b) rectification of your personal data;
- (c) erasure of your personal data;
- (d) restrict processing of your personal data;
- (e) object to processing (including object to receiving marketing) of your personal data;
- (f) data portability; and
- (g) lodge a complaint with a EU supervisory authority.