

Privacy policy

1. PRIVACY POLICY OVERVIEW

- 1.1. These terms (“Privacy Policy”) set out how any member of the Fintonia Group (including Fintonia Group Holdings Limited, Fintonia Group (Singapore) Pte. Ltd and affiliates) (“Fintonia”, “we” or “our”) as the Data Controller collect, use, manage and protect your personal data for purposes of the Singapore Personal Data Protection Act (“PDPA”).
- 1.2. By visiting our website(s) (including <https://fintoniagroup.com>) (the “Website” or “Websites”), using our platform (the “Platform”) or using our mobile application(s) (the “App” or “Apps”), you agree to be bound by the terms of the Privacy Policy, as may be revised or updated by us from time to time, and consent to us collecting, using and disclosing your personal data in the manner set forth below.

2. TYPE OF PERSONAL DATA COLLECTED

- 2.1. We variously collect the following type of personal data from visitors to our Websites or users of our Apps and Platform:
 - (a) information that you provide when registering or investing with us;
 - (b) details of your usage of our Website, App and Platform;
 - (c) information regarding transactions that you effect over our Website, App or Platform; and
 - (d) other personal data that you may provide to us from time to time.

3. HOW DO WE COLLECT SUCH PERSONAL DATA

- 3.1. We may variously collect your personal data in one or more of the following ways:
 - (a) when you submit such data to us, directly or indirectly;
 - (b) when you interact with us, whether over the internet, telephone, via email, in person or otherwise;
 - (c) when you undertake any transactions using our computer systems, Platform, Websites, App or any such network;
 - (d) through third parties or the public domain; or
 - (e) through the use of cookies (or similar technology) when you browse our Websites.
- 3.2. If you have or are using more than one of our Websites, Apps or our Platform, we may link all your accounts and personal data to enable us to have an overall picture of your relationship with us.

4. USE OF PERSONAL DATA

- 4.1. We may use your personal data to:
 - (a) For General Support
 - (i) send you notices, communications, statements of account and invoices;
 - (ii) verify your identity before allowing you access and to use the functionality of our Websites, Apps and Platform;

- (iii) process applications for or to provide products and services, effecting payments, transactions and completing instructions or requests; and to
- (iv) respond to any of your queries, applications, feed-back and complaints.

(b) For Internal Operations

- (i) administer our Websites, Apps and Platform, including for legal and compliance purposes;
- (ii) administer and manage our relationship with you;
- (iii) personalise our services to you;
- (iv) publish or use information about you in accordance with our Website Terms and Platform Terms;
- (v) assess your suitability for products and services;
- (vi) facilitate statistical and other operational purposes;
- (vii) facilitate any other purposes reasonably related or ancillary to the above purposes;
- (viii) facilitate any other purposes for which your specific consent was obtained or given; and
- (ix) comply with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;

(c) For Marketing Purposes

- (i) send you marketing and promotional materials relating to our services (through EDMs, direct mailers, telephone calls, social media, third party sites and other such means);
- (ii) conduct market research and surveys with the aim of improving our products and services; and
- (iii) facilitate other marketing purposes, promotional events, lucky draws and competitions.

4.2. For some purposes in connection with the service you have requested, we have a legal or regulatory obligation to process your personal data. These purposes include:

- (a) the prevention, detection, investigation and prosecution of crime in any jurisdiction (including, money laundering, terrorism, fraud and other financial crime);
- (b) identity verification, government sanctions screening and due diligence checks; and
- (c) to comply with: local or foreign law, regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency, or exchange body.

4.3. We may also process your personal data to comply with policies and good practice standards where it is in our legitimate interest to do so. We may also process your personal data where it is in our legitimate interests to seek professional advice, including, in connection with any legal proceedings (including any prospective legal proceedings), for obtaining legal advice or for establishing, exercising or defending legal rights.

5. DISCLOSURE OF PERSONAL DATA

- 5.1. Subject to the terms of the Privacy Policy, we may, from time to time, disclose your personal data or part of your personal data to any of the following parties (located in any jurisdiction) for any of the purposes specified above:
- (a) our officers, employees, agents or directors;
 - (b) professional advisers (including auditors), third party service providers, agents or independent contractors providing services to support Fintonia's operations and business;
 - (c) our business alliance partners who may provide their product or service to you (to the extent allowable by applicable law);

- (d) upon your death or mental incapacity, your legal representative and their legal advisers, and a member of your immediate family for the purpose of allowing him or her to make payment on your account;
- (e) any person to whom disclosure is allowed or required by local or foreign law, regulation or any other applicable instrument;
- (f) any court, tribunal, regulator, enforcement agency, exchange body, tax authority, or any other authority (including any authority investigating an offence) or their agents;
- (g) any debt collection agency, credit bureau or credit reference agency, rating agency correspondents, insurer or insurance broker, direct or indirect provider of credit protection and fraud prevention agencies; and
- (h) any financial institution to conduct credit checks, anti-money laundering related checks, for fraud prevention and detection of crime purposes.

6. MONITORING

- 6.1. To the extent permitted by law, we may record and monitor your electronic communications with us to ensure compliance with our legal and regulatory obligations and internal policies for the purposes outlined above.

7. MARKETING, AUTOMATED DECISIONS AND PROFILING

- 7.1. We process your personal data for these purposes because it is in the interest of our business to do so with the intention of improving our products and services and generating business. Our officers and employees may from time to time contact you to discuss products and services designed to suit your investment objectives and interests.
- 7.2. You have the right to opt out of receiving marketing material at any time. If you ask us not to send you marketing material or other promotional or research material you have subscribed to receive, we will need to retain a record that you have asked us not to do so to ensure that you do not receive anything further.
- 7.3. We may use profiling, including behavioural analysis, to assist us to provide you with better services, to make decisions and to prevent money laundering, terrorism, fraud and other financial crime. If any profiling will result in an automated decisions relating to you, we will let you know and you will have the right to discuss the decisions with us.

8. WITHDRAWAL OF CONSENT

- 8.1. If you wish to withdraw your consent to our collection, use or disclosure of your personal data in accordance with this Privacy Policy, you may do so by notifying us in the manner specified below.
- 8.2. We may require up to 3 weeks from the date of your notification to duly respond to the request and effect any necessary changes (including, where applicable, conveying such notification to any relevant third party that we work with). Please note that depending on your request, the nature of any investments which have not been redeemed, the changes to our collection, use or disclosure of your personal data may not be effected with immediate effect.
- 8.3. Depending on the extent to which you withdraw consent to our use of your personal data for any purpose(s), such withdrawal may be considered a termination by you of any agreement

with us and, to the extent that any such purpose(s) are intrinsic to the provision of our services to you, we reserve the right to immediately discontinue or cease the provision of such services. In the event that such withdrawal is considered a termination by you of any agreement or results in the closure of your account with us, your account will only be closed in accordance with the terms of any investment agreements signed with us and we will require up to 3 weeks from the full redemption of your investments with us, to effect any necessary changes to our collection, use or disclosure of your personal data.

- 8.4. In so far as your personal data is being collected by cookies, you may disable the use of cookies on your internet browser when accessing our Website. This, however, may result in a total or partial loss of the functionality of our Website and Platform or delay or affect the way in which our Website and Platform operate, for which we accept no liability.

9. ACCESS AND CHANGES TO PERSONAL DATA

- 9.1. You may, at any time, contact us, in the manner specified below, to request changes to or to obtain information about the personal data that we have collected from you and how we have used it, as well as to change your specific marketing-related preferences. Please note that we are not required, under the PDPA, to allow access to and correction of personal data in certain situations. The PDPA also allows us, and we reserve the right, to charge a reasonable fee for the handling and processing of any requests to access personal data in accordance with this Paragraph.
- 9.2. We may require up to 3 weeks from the date of notification to duly respond to a request for access or correction of personal data and to effect any necessary changes (including, where applicable, conveying such request or notification to any relevant third party that we work with).

10. RETENTION OF YOUR PERSONAL DATA

- 10.1. We will retain your personal data as long as the purpose for which it was collected remains, in line with our legal and regulatory obligations and for business and operational purposes. In the majority of cases, this will be for seven (7) years from the end of your relationship with us.

11. PROTECTION OF YOUR PERSONAL DATA

- 11.1. We will implement reasonable security arrangements to maintain the confidentiality and to prevent any unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to or of any personal data in our possession (including, using firewalls and other technology or security procedures to secure our computer network and prevent unauthorized access to the network).
- 11.2. We will take reasonable steps to ensure that any third party who receives personal data from us protects such data in a manner consistent with this Privacy Policy and will not use such personal data for any purpose(s) other as specified by us, in accordance with the terms of this Privacy Policy. Wherever possible, these obligations will be incorporated into the terms of our written agreements with such third parties.
- 11.3. If we transfer or store any personal data at a location outside Singapore, we will take reasonable steps to ensure that personal data is kept securely and such data receives a standard of protection comparable to that accorded under the PDPA.

11.4. You should be aware that the internet is not a secure form of communication and sending us any personal data over the internet carries with it risks including the risk of access and interference by unauthorised third parties. For the avoidance of doubt, we will not be responsible in any way for the security or management of any personal data accessed by unauthorised third parties and personal data which you share with any third party websites including those accessible via links on our Website.

12. UPDATES TO OUR PRIVACY POLICY

12.1. We may from time to time update the terms of the Privacy Policy to, among other things, meet our business objectives and ensure compliance with applicable laws. Such updates will be duly uploaded onto our Websites and made available to registered Clients, Investors, Members and other users of our Platform but you will, nonetheless, remain primarily responsible for keeping yourself updated of the latest terms from time to time.

13. COMMUNICATIONS AND NOTIFICATIONS PURSUANT TO THIS PRIVACY POLICY

13.1. If you have any questions or wish to send us any communication or notification regarding this Privacy Policy or any of your personal data in our possession, you may write to or contact our designated Data Protection Officer at:

Email: operations@fintonia.asia

Tel: +65 3163 2628

Attention: Data Protection Officer

Updated as at 30 August 2021