



Annex 3

Platform Privacy Policy

SYFE PTE. LTD. and its Delegates (collectively referred to as “**we**” or “**us**” in this Privacy Policy) operate this electronic trading platform at www.syfe.com (the “**Platform**”) and the Services (as defined below) provided therein. We are committed to respecting and protecting your personal data collected through or in connection with our Platform.

1. Introduction

We take our responsibilities under the Singapore Personal Data Protection Act 2012 seriously. We also recognise the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Privacy Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at the contact details below.

This Privacy Policy (together with our Terms and Conditions of Platform Use) sets out the basis on which we use and process any personal data we collect from you as a user of our Platform. By accessing our Platform and/or using the services and information on our Platform (regardless of whether you open an Account), you hereby agree to be bound by the terms of this Privacy Policy.

In addition, our Platform may, from time to time, contain links to and from the platforms or websites of our partner networks, advertisers, affiliates or other third parties. If you follow a link to any of these platforms or websites, please note that these platforms websites have their own privacy policies. As these platforms and websites are not owned or operated by us, we do not accept any responsibility or liability for the contents of these platforms or websites and their privacy policies and you access and provide your personal data to these third party platforms or websites at your own risk. Please check these policies before you submit any personal data to any such platforms or websites.

2. Personal data we collect

We may collect and process personal data about you in all of our interactions with you, such as:

- (a) Personal data that you may provide when submitting or making available personal data to us when signing up to be our client (regardless of whether the sign-up process is completed by you) or using our Platform. This includes but is not limited to your name, email address and contact details.
- (b) If you contact us for any reason, we may keep a record of that correspondence.
- (c) Personal data that may be captured via any error logging and reporting tool that captures error report data and, at your option and with your consent, sends this data



to us in order for us to be informed of any software errors or problems that may occur during your use of our Platform or the services provided on it.

- (d) Details of your visits to our Platform, the activities you engage in when accessing our Platform and the Services that you use or access on or via our Platform.

3. Cookies

We use cookies on our Platform. A cookie is a text file that a website transfers to your computer's hard disk so that the website can remember who you are. Cookies only record those areas of a website that have been visited by your computer and for how long.

You have the ability to accept or decline cookies by modifying the setting in your browser. If you would like to do this, please see the help menu of your browser. However, you may not be able to use all the interactive features of our Platform if cookies are disabled.

4. How we use your personal data

We may use your personal data that we possess to provide, personalise, maintain and improve our Platform and Services, including for the following purposes:

- (a) to process, administer and/or manage your client account with us, facilitate and/or enhance your experience, and contact you as may from time to time be necessary in connection with your use of our Platform and/or the Services made available on it (including the sign-up process);
- (b) to contact you through the contact information provided by you in order to provide you with information that you request from us;
- (c) to manage and administer your use of our Platform and/or Services, including to resolve user support issues, and contact you as may from time to time be necessary in connection with your use of our Platform and/or Services;
- (d) to collect information relating to your online interactions with us (including, for example, your IP address and the pages you view) so that we can offer you a more consistent and personalised experience in your relationship with us and better serve your needs by customising the content that we share with you;
- (e) to store, host and/or back up (whether for disaster recovery or otherwise) your personal data, whether within or outside Singapore;
- (f) for record-keeping purposes;
- (g) to conduct research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our Platform, services and facilities in order to enhance the services we provide to you;
- (h) to perform credit risk, know-your-customer, anti-money laundering / countering the financing of terrorism, financial and other relevant risk assessments and checks on you; and
- (i) to market our and our partners', sponsors' and advertisers' products, services, events or promotions, including to send you alerts, newsletters, updates, mailers, promotional materials, special privileges, festive greetings, etc.. We may communicate such marketing to you by post, email, telephone call, short message service, online messaging service, push notification, or by hand. You may



unsubscribe to the use of your personal data for marketing and promotions by clicking on “Unsubscribe” in the relevant email or message.

We may also use your personal data for legal and company administration purposes, including:

- (a) to investigate and resolve claims or disputes;
- (b) to protect the rights, property or safety of any person (including for the purposes of fraud detection and prevention);
- (c) when we are required, advised, recommended, expected or requested to do so by our legal advisors or any local or foreign legal, regulatory, governmental or other authority, statutory boards, related companies, including for any audit, compliance, investigation or inspection purposes;
- (d) to comply with court orders, applicable law, regulation, legal process or government request;
- (e) to enforce or apply our Terms of Use and/or Agreement, or any other arrangements with you;
- (f) to respond to legal process, pursue legal rights and remedies, defend litigation and managing any complaints or claims; or
- (g) in connection with mergers, acquisitions, joint ventures, sale of company assets, consolidation, restructuring, financing, business asset transactions, or acquisition of all or part of our business by another company.

5. Disclosure of your information

Your personal data may be used, disclosed, maintained, accessed, processed and/or transferred to the following third parties, whether sited in Singapore or outside of Singapore for one or more of the purposes set out in paragraph 4 above:

- (a) our headquarters, subsidiaries and group companies;
- (b) third party service providers which require the processing of your data, for example, third party service providers which have been engaged by us to: (i) to provide and maintain any IT equipment used to store and access your personal information; (ii) to host and maintain our Platform; (iii) to conduct research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve our Platform, services and facilities in order to enhance the services we provide to you; (iv) to advise us in connection with the activities carried out pursuant to our Platform and/or Services; or (v) otherwise in connection with the provision of certain services provided to you on or via our Platform;
- (c) our Broker, auditors and legal advisors;
- (d) public and governmental/regulatory authorities, statutory boards, industry associations; or
- (e) courts and other alternative dispute forums.

In certain circumstances we may provide third parties (whether or not located in Singapore) with aggregate information about our Platform's users. This may include information about your computer, including where available your IP address, operating system and browser



type, for system administration and to report aggregate information to our advertisers. This is anonymised statistical data about our users' browsing actions and patterns, and does not identify any individual.

6. Protection of your personal data

We have implemented reasonable and appropriate physical, technical and administrative measures to store and protect your personal data from unauthorised access and use. Access to your personal data is limited to authorised personnel only and on a need-to-know basis.

Notwithstanding the foregoing, you acknowledge that no method of protection and/or transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we endeavour to protect the security of your personal data and are constantly reviewing and enhancing our information security measures.

7. Transfer of your personal data outside of Singapore

The personal data that we collect from you may be transferred to, used, processed and stored outside of Singapore for one or more of the purposes set out above. By submitting your personal data and/or using our Platform, you agree and consent to such transfer, storing or processing.

We have entered into contractual undertakings to ensure that the personal data which we collect from you and transfer to our service providers (whether or not located in Singapore) is adequately protected.

We will take reasonable steps to maintain appropriate physical, technical and administrative security to help prevent loss, misuse, unauthorised access, disclosure or modification of your personal information. Such steps could include, but are not limited to, ensuring that third party service providers are compliant with recognised cybersecurity standards such as those set out by the International Organisation for Standardisation (ISO 27001) or the System and Organisational Controls (SOC 2).

You agree that this paragraph 7 constitutes a reasonable summary in writing of the extent to which your personal data to be transferred will be protected to a standard comparable to the protection under the Singapore Personal Data Protection Act 2012.

8. Retention period of personal data

We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, and in accordance with applicable laws.

9. Updating your information

Where you submit your personal data on our Platform, you should ensure such personal data is accurate, and let us know if and when such personal data changes so that we are not holding any inaccurate personal data about you.

10. Your rights

You may withdraw your consent for us to collect, use, disclose and/or process your personal data for some or all of the purposes listed in this Privacy Policy. However, depending on the nature and scope of your request, we may not be able to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Withdrawing consent does not affect our right to continue to collect, use, disclose



and/or process personal data where such collection, use, disclosure and/or processing without consent is permitted or required under applicable laws.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the nature and scope of your request and its impact on our relationship with you) for your request to be processed and for us to notify you of the relevant consequences, including any legal consequences which may affect your rights and liabilities. In general, we will endeavour to process your request within ten business days from receipt.

You may request to access and/or correct the personal data currently in our possession by writing to the Data Protection Officer using the contact details provided below. Please note that we may charge you a reasonable fee for the handling and processing of your requests to access your personal data. We will endeavour to process or respond to your request (where necessary) within thirty business days from receipt.

11. Changes to this Privacy Policy

We reserve the right to amend the terms of this Privacy Policy at our absolute discretion. Any amended privacy policy will be posted on our Platform. You are expected to check this page from time to time to take notice of any changes we have made as they are binding on you. Your continued use of our Platform and/or the services made available on or via our Platform following any amendment of this Privacy Policy will signify your assent to and acceptance of its revised terms.

12. Further information about protection of personal data and the Singapore Personal Data Protection Act 2012

If you want to contact us with specific queries or concerns in relation to this Privacy Policy, or if you have any questions or complaints as to how your personal data is collected, used, disclosed, protected and/or processed by us, please contact our Data Protection Officer at selwyn.lim@syfe.com.