

## DATA PROTECTION POLICY

### Preamble

Kliq Private Limited, our subsidiaries and affiliates (“we”, “us”, or “our”) care about your privacy and are committed to processing your personal information in accordance to fair information practices and applicable data protection laws.

This Data Protection Policy (“**Policy**”) sets out the basis which *Kliq Private Limited* (“we”, “us”, or “our”) may collect, use, disclose or otherwise process personal data of our customers in accordance with the Personal Data Protection Act (“**PDPA**”). This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

By interacting with us, submitting information to us, or using our services offered by us, you agree and consent to Kilq Private Limited, as well as our representatives and/or agents collecting, using, disclosing and sharing amongst themselves your personal to Kliq Private Limited’s affiliate service providers in a manner as set out in this Data Protection Policy.

### PERSONAL DATA

1. As used in this POLICY:

“**customer**” means an individual who (a) has contacted us through any means to find out more about any goods or services we provide, or (b) may, or has, entered into a contract with us for the supply of any goods or services by us; and

“**personal data**” means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. When you use our services, contact us, access our websites or application, we collect personal information about you and may use it along with other information collected or generated during our relationship with you.

3. **Generally**, we collect different types of personal information relating to you which may include:

3.1 Contact information such as:

- 3.1.1 your name;
- 3.1.2 postal address;
- 3.1.3 e-mail address;
- 3.1.4 telephone number;
- 3.1.5 date of birth;
- 3.1.6 gender;
- 3.1.7 citizenship;
- 3.1.8 occupation;
- 3.1.9 government or national identification numbers.

3.2 Transaction information:

- 3.2.1 source of funds;
- 3.2.2 remittance amounts;
- 3.2.3 payment purpose
- 3.2.4 other information related to the beneficiaries and recipients

3.3 Compliance information including:

- 3.3.1 fraud prevention;
- 3.3.2 identity verification
- 3.3.3 sanction checks;
- 3.3.4 information as required in compliance with the relevant Acts and Guidelines under Monetary Authority of Singapore.

4. To conduct a money transfer, or use other payment services, you must provide certain information required by Kliq Private limited to execute the transfer and to enable us to comply with our legal obligations associated with transferring money.

5. Failure to provide some of your personal information may affect our ability to provide our services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

6. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

### **COLLECTION OF PERSONAL DATA**

7. **Generally**, we collect your data through the following means:

7.1 Where the data is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us after:

- 7.1.1 you (or your authorised representative) have been notified of the purposes for which the data is collected, and

- 7.1.2 you have provided consent following the preamble to the collection and usage of your personal data for those purposes, or
- 7.2 Where collection and use of personal data without consent is permitted or required by the PDPA or other laws.
- 7.3 Through transaction forms and your interactions with Kliq Private Limited.
- 7.4 Through our mobile application (which is managed by third parties on behalf of Kliq Private Limited).
- 7.5 Through your interest in Kliq Private Limited's advertisement placed on third party sites.
- 7.6 Through the cookies function when you visit our website though the option is available should you choose to reject the acceptance of any cookies.
- 8. In addition to the personal information, we collect from you directly, we may also collect your personal information from beneficiaries or recipients of the funds, agents, vendors, business partners, regulatory authorities and other data sources.
- 9. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

## **USE OF PERSONAL DATA**

- 10. **Generally**, we may collect and use your personal data for any or all of the following purposes:
  - 10.1 performing obligations in the course of or in connection with our provision of the goods (including analytics) and/or services requested by you;
  - 10.2 verifying your identity;
  - 10.3 responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - 10.4 managing your relationship with us;
  - 10.5 processing payment or credit transactions;
  - 10.6 complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority in relation to activities but not limited to, fraud detection, anti-money laundering activities, counter-terrorism financing, theft and other illegal or wrongful activities;

- 10.7 transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes;
- 10.8 any other incidental business purposes related to or in connection with the above.

### **DISCLOSURE OF PERSONAL DATA**

11. **In addition to paragraph 10**, we may disclose your personal data for the following purposes:
- 11.1 where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you;
- 11.2 onto third-party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.
12. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

### **INTERNATIONAL DATA TRANSFER**

13. We transfer your information to parties in countries outside Singapore as permitted or required by the applicable law, regulatory authorities, law enforcement and government agencies in the chosen jurisdiction. By using our services, you agree that that such information transfers outside the country of residence or employment may occur.

### **EXTERNAL USAGE**

14. Kliq Private Limited may be linked to external websites and/or services and Kliq Private Limited does not control nor review, and is not responsible for the content or privacy policies of such external services and/or websites. Kliq Private Limited does not endorse such websites/services or make warranties about any information users may find on such websites and/or services unless expressly stated so.

### **RELIANCE ON THE LEGITIMATE INTERESTS EXCEPTION**

15. In compliance with the PDPA, we may collect, use or disclose your personal data without your consent for the legitimate interests of *Kliq Private Limited* or another person. In relying on the legitimate interests exception of the PDPA, *Kliq Private Limited* will assess the likely adverse effects on the individual and determine that the legitimate interests outweigh any adverse effect.
16. In line with the legitimate interests' exception, we will collect, use or disclose your personal data for the following purposes:

- 16.1 Fraud detection and prevention;
  - 16.2 Detection and prevention of misuse of services;
  - 16.3 Network analysis to prevent fraud and financial crime, and perform credit analysis; and
  - 16.4 Collection and use of personal data on company-issued devices to prevent data loss.
17. The purposes listed in the above clause may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in anyway, for a reasonable period thereafter.

### **WITHDRAWING YOUR CONSENT**

18. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
19. Upon receipt of your request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.
20. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 8 above.
21. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

### **ACCESS TO AND CORRECTION OF PERSONAL DATA**

22. If you wish to make an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
23. Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

24. We will respond to your request as soon as reasonably possible. In general, our response will be within thirty (30) business days. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

## **PROTECTION OF PERSONAL DATA**

25. We seek to take reasonable steps use protect and safeguard your data in compliance with applicable governmental laws and regulations.
26. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as:
- 26.1 minimised collection of personal data;
  - 26.2 authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.);
  - 26.3 encryption of data;
  - 26.4 data anonymisation;
  - 26.5 up-to-date antivirus protection;
  - 26.6 regular patching of operating system and other software;
  - 26.7 securely erase storage media in devices before disposal;
  - 26.8 web security measures against risks, usage of one time password(otp)/2 factor authentication (2fa)/multi-factor authentication (mfa) to secure access;
  - 26.9 and security review and testing performed regularly.
27. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.
28. Please contact our DATA PROTECTION OFFICER, if you have reasons to believe your personal information held by us may be at risk.

## **ACCURACY OF PERSONAL DATA**

29. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below.

### **RETENTION OF PERSONAL DATA**

30. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
31. We will cease to retain your personal data, or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

### **DATA PROTECTION OFFICER**

32. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email Address : [privacy@eremit.sg](mailto:privacy@eremit.sg)

### **EFFECT OF POLICY AND CHANGES TO POLICY**

33. This Policy applies in conjunction with any other policies, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
34. We may revise this Policy from time to time without any prior policy. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.