

# **Privacy Policy**

30 November 2018

#### 1. Introduction

This Privacy Policy describes the policies of Swaplt Tech Pte Ltd ("Swaplt", "we", "our" or "us") on the collection, use and disclosure of your information in accordance with the Personal Data Protection Act 2012 ("PDPA"), and the services, features, content, products, website and applications we offer (collectively, our "Services"). When you use our Services, you are consenting to the collection, transfer, storage, disclosure and other uses of your information as described in this Privacy Policy.

#### 2. Collection of Information

# 2.1. Information you provide to us:

You may provide information about yourself directly to us when you fill in forms to register or modify your account, request on-demand services, contact customer support, or otherwise communicate with us. This information may include, but not limited to: name, email address, national identity card details, passport details, phone number, permanent and/or mailing address, nationality, date of birth, bank account details (i.e. bank name, account number, account holder name), pictures for proof of identity and address (i.e. national identity card, driver's license, bank/credit card statement, utility bills statement) and your opinions that was communicated to us (i.e. through feedback, enquiry, survey/interview responses).

# 2.2. Information we collect about you:

We may collect information about you when you use our Services. This information may include, but not limited to: transaction information (i.e. date, time, frequency, amount and other related transaction details), contacts information (i.e. contact details of your address book). We may also use cookies and other technologies to receive information about your activities carried out to facilitate us to generate and compile statistics about you and also help us to improve our Services. This information may include, but not limited to: internet protocol (IP) address, device information, geolocation, and any other information when you use our Services.

#### 2.3. Information we receive from other sources:

We may receive information about you if you use any other services we provide. We may also receive information about you from third parties including, but not limited to: banks (when you transfer money to us), payment service providers, credit reference agencies, analytics providers, advertising networks, social media networks (i.e. Facebook, Instagram, Twitter) information search engines (i.e. Google, Yahoo) and any other third parties.

#### 3. How We Use Your Information

### 3.1. We may use your information in the following ways, including (but not limited to):

a) To carry out internal operational activities and provide you with the products and services that you request from us;



- b) To provide you with information on any similar products and/or services, promotions, offers, rewards, events, news and information that we deem may be of interest to you;
- c) To notify you about any changes or updates to our Services;
- d) To comply with any applicable laws, rules and regulations;
- e) To assess and/or carry out due diligence on your application or requests instructed by you;
- f) To provide you with customer support and respond to your enquiries, feedbacks and requests in the event that you encounter any issues when using our Services;
- g) To monitor, analyse and perform analytics on your usage of our Services;
- h) To investigate and/or report to relevant regulatory authorities, if any, suspicious transactions carried out by you when using our Services;
- i) To ensure a safe and secure environment for all users of our Services;
- j) To deliver marketing and advertising efforts to you; and
- k) To maintain records for reporting purposes such as audit, regulatory, security, risk and any other purposes as may be required by relevant laws and regulations.

#### 4. Disclosure of Information

- 4.1. We may share your information with our group companies, third parties, including business partners, affiliates, suppliers, advertisers, analytics and search engine providers, in order to carry out our business activities as stated above, as well as the general public should if you have submitted any content through public forum, such as blog comments, social media posts, or other features of our Services that are viewable by the general public. We will only share your information to provide or improve our products, services and advertising, and your information will not be shared with third parties for their marketing purposes.
- 4.2. We may also share your information with third parties in order to comply with any applicable laws, rules and regulations, other applicable agreements, to prevent, detect and assist in any investigations related to fraud or other illegal activities, to prospective buyer or seller in the event that we sell or buy any business assets; and to protect the rights, property and safety of Swaplt, our customers and/or others. Your information provided to us is stored in a safe and secured server. By submitting your information to us, you are giving us consent to transfer, store, or process your information.

#### 5. Access and Corrections to Information

- 5.1. You may request for access or make corrections to your data that is held by us. There may be a fee imposed to meet our costs for processing your request for access or corrections. In the event that a fee is imposed, details and information will be made available to you.
- 5.2. If you would like to request for access or make corrections to your information, you may contact us at the details provided under the "Contact Us" section as stated below.

# 6. Changes to Our Privacy Policy

6.1. We may, from time to time, make changes to our privacy policy and such changes made will be posted on this page, and where appropriate, we will notify you via email and/or any other





communication channels including our website and/or mobile applications. Please check this page frequently to keep yourself updated on the latest changes to our privacy policy.

# 7. Contact Us

7.1. If you have any other questions, comments, feedbacks that you would like to raise to us, please feel free to contact us at privacy@swapitcurrency.com.