

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how we collect and process your personal data when you visit our Site, or through your use of the Services and any data you may provide when you register for or use the Services, sign up for alerts or newsletters, contact us with a question or request for help, participate in any renewals, promotions or surveys.

The Site and the Services are not intended for minors below 18 and we do not knowingly collect data relating to minors.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice, we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Notice supplements other notices and privacy notices and is not intended to override them.

Contact details

If you have any questions or complaints about this Privacy Notice or our privacy practices, please contact our compliance team in the following ways: compliance@b-i-g.pro

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated on the date above written. If we change our Privacy Notice and you have already registered with us we will let you know in advance by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Site and App may include links to third-party websites, plug-ins and applications ("Third Party Sites"). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Sites and are not responsible for their privacy statements. When you leave our Site or App, we encourage you to read the privacy notice of every Third Party Site you visit or use.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender, a visual image of your face, tax identification number, national identity cards, passports or other form of identification documents including proof of address such as a utility bill or bank statement.

- **Contact Data** includes billing address, delivery address, home address, work address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of any transactions you enter into using products and services you have purchased from us.
- **Investment Data** includes information about your investment objectives, investment experience and prior investments.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location data, browser plug-in types and versions, operating system and platform, and other technology or information stored on the devices you allow us access to when you visit the Site or use the Services, such as friends lists or other digital content.
- **Profile Data** includes your username and password, requests by you for products or services, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our Site, App, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

As explained above under **Identity Data**, we will also collect a visual image of your face which we will use, in conjunction with our sub-contractors, to check your identity for onboarding purposes. This data falls within the scope of special categories of data (see Special Categories of Data below). When we ask to collect a visual image of your face you will be asked for your specific consent. You can refuse to provide this but it means that we will be unable to register you and provide you with the Services.

In addition, the law also treats certain other categories of personal information as special. This includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data, as well as details of criminal records. We will not collect or use these types of data (known as Special Categories of Data) without your consent unless the law allows us to. If we do, it will only be when it is necessary:

- for reasons of substantial public interest (for example to use criminal records to help prevent, detect, and prosecute unlawful acts and fraudulent behavior);
- to establish, exercise or defend legal claims.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

If you refuse to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms, providing a visual image of yourself via the Service, by email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account;
- subscribe to our service or publications;
- make use of any of our Services;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with us via our Site or App, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We will also collect Transaction Data and Investment Data. We may also receive Technical Data about you if you visit other websites employing our cookies. Please refer to our main website, where you can access the Cookie Consent banner for more details.

Third parties or publicly available sources. We also obtain information about you from third parties (such as employers, credit reference agencies and fraud prevention agencies) who may check your personal data against any information listed on other databases.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For the provision of the Services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your Identity, Contact, Technical, Transactional, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services or Site may become inaccessible or not function properly. For more information about the cookies we use, please see refer to our main website, where you can access the Cookie Consent banner for more details.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may share your personal data with our third party service providers, agents, subcontractors and other associated organizations, our group companies and Affiliates in order to complete tasks and provide the Services to you on our behalf. When using third party service providers, they are required to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may pass your personal data to the following entities:

- companies and organizations that assist us in processing, verifying or refunding transactions you make via our App or the Mastercard/UnionPay card and in providing any of the Services that you have requested;
- identity verification agencies to undertake required verification checks;
- fraud prevention agencies to help fight against financial crime including fraud, money-laundering and terrorist financing;
- mobile application developers;
- organizations which assist us with customer service facilities;
- anyone to whom we lawfully transfer or may transfer our rights and duties under the relevant Terms & Conditions governing the use of any of the Services;
- any third party as a result of any restructure, sale or acquisition of our group or any Affiliates, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting

or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law, we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for at least 5 years after they cease being customers for regulatory purposes.

In some circumstances, you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a

security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

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