

## Privacy Notice

### Personal Data Protection and Privacy Notice (“Privacy Notice”)

This Privacy Notice is issued in accordance with the Personal Data Protection Act 2012 (“Act”) to enable you to understand the following:

- a. What kind of Personal Information\* GOLDX collects and the ways of collecting it;
- b. How GOLDX uses your Personal Information;
- c. The parties that GOLDX discloses or may disclose your Personal Information to;
- d. The choices that GOLDX offers, including how to access and update the Personal Information.

*\*Note: “Personal Information” in this Privacy Notice refers to any information which relates directly or indirectly to you and/or your transactions with us as set out in Clause 1 below. Also, please note that this Privacy Notice is applicable only if you are an individual.*

#### 1. Types of Personal Information which we collect and source of information

The types of Personal Information which we collect includes but is not limited to data and information pertaining to yourself such as your name, address, e-mail address (or other contact information), age, National Documentation number. The information serves to establish your identity, background, as well as suitability of the products and services offered by GOLDX and our business partners, if applicable.

We may obtain this information from yourself and from a variety of sources, including but not limited to:

- a. through your relationship with us, for example information provided by you in application forms, when using our products or services, when taking part in customer surveys, competitions and promotions, and during financial reviews;
- b. through your verbal, written and e-mail communications with us and/or our authorised agents;
- c. from an analysis of the way you use and manage your account(s)/facility(ies) with us, from the transactions you make and from the payments which are made to your account(s)/facility(ies);
- d. from third parties such as employers, credit reference information providers, government/statutory agencies, and/or
- e. from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

#### 2. How we use your Personal Information

GOLDX collects, uses, and/or processes your personal data for the following purposes:

- a. to process application for products offered by GOLDX and/or its business partners and/or services which you had subscribed for;
- b. to notify you about important changes/developments to the product/service features;

- c. to assess/verify your credit worthiness;
- d. to communicate with you including responding to your enquiries and/or complaints and resolving disputes;
- e. for the purposes of strategic alliances, cross selling, marketing, and promotions; by other units/department/ entities within GOLDX, our agents and third parties;
- f. to comply with regulatory requirements and provide assistance to law enforcement agencies;
- g. to research and develop products and/or services;
- h. to administer and/or manage products and services to you including collecting debts and enforcement of our rights and obligations;
- i. to improve and develop our services and quality assurance to you;
- j. to prevent, detect or prosecute cases of fraud/crime and comply with legal and regulatory obligations;
- k. for legal purposes (including but not limited to obtaining legal advice and dispute resolution);
- l. to maintain your credit history for present and future reference (if deemed necessary), and
- m. to protect GOLDX's interests and other related purposes.

### **3. Disclosure of your Personal Information**

While GOLDX treats your Personal Information as private and confidential, the Personal Information may be disclosed, disseminated and/or transferred to the following:-

- a. entities and business units within the GOLDX Group in and outside Singapore, for the purposes of providing customers with latest marketing and promotional offers which may be of interest to customers;
- b. licensees, business partners and third-party service providers;
- c. professional advisors including consultants, lawyers, accountants, auditors, bankers, rating agencies, trustees, insurers, auctioneers and brokers on a need to know basis for the purposes of providing their services/advices to us;
- d. credit bureaus, debt-collection agencies and/or other parties who assist with debt recovery functions;
- e. agent or contractors acting on our behalf or appointed by us to act on our behalf;
- f. regulatory, government bodies or other authorities if required or authorised to do so to discharge any regulatory function under any law or in relation to any order or judgment of a court;
- g. any relevant institution/party to facilitate your request/dealings in respect of the credit facilities, accounts, products and/or services obtained from GOLDX;
- h. any parties authorised by you;
- i. any person or corporation to whom GOLDX may transfer or propose to transfer any part of its interests, obligations, business and/or operations.
- j. subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to GOLDX and further subject to your rights as stated in this Privacy Notice.

### **4. Security measures adopted to protect Personal Information**

The security of your Personal Information is our priority. GOLDX keeps, protects and processes your Personal Information in a secure manner by taking reasonable

measures in maintaining physical, electronic and procedural safeguards, in compliance with applicable regulations.

We ensure that access of GOLDX employees to the Personal Information which you have provided to us is limited to authorised employees who are trained in handling your information. These authorised personnel are required to ensure the confidentiality of your information and to respect your privacy at all times.

## **5. Retention of your Personal Information**

GOLDX will retain your Personal Information in compliance with this Privacy Notice and/or the terms and conditions of your agreement(s) with GOLDX for the duration of your relationship with us, for such period as may be necessary to protect the interests of GOLDX and/or its customers as may be deemed necessary, where otherwise required by the law and where required based on GOLDX's relevant policies.

## **6. Your choice to supply Personal Information**

In order to process your application for products or services offered by GOLDX and to comply with the relevant laws and regulations applicable to GOLDX, GOLDX requires you to provide your Personal Information as indicated in the application or service request forms. By choosing to utilise our products and services, you choose to provide your Personal Information to us. Should you decline to provide such Personal Information, we may not be able to communicate with you, process your application/request or provide you with our products or services.

## **7. Your rights to Personal Information**

Keeping your data and information accurate and updated is very important to us. You are responsible to ensure that the Personal Information which you provide to us is accurate, complete and not misleading and that such Personal Information is kept up to date.

You have the right to request for access to your Personal Information and to request for amendment, correction and erasure (if you are in the European Union) of your Personal Information by contacting us through the channels stated below in clause 13 of this Privacy Notice, if you have reason(s) to believe that your records with us are inaccurate, incomplete or not updated.

We will use reasonable efforts to comply with your request to access or correct your Personal Information subject to due verification and further communication with you. Please note that GOLDX may have to withhold access to your Personal Information in certain situations, for example when we are unable to confirm your identity or where information requested for is of a confidential commercial nature or in the event we receive repeated requests for the same information. Nevertheless, we will notify you of the reasons for not being able to accede to your request.

Please also note that GOLDX may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

## **8. Choices relating to use of your Personal Information**

Subject to clause 6 above and the contractual rights and obligations of GOLDX under relevant laws and regulations, you may exercise your choice in respect of the disclosure, retention, correction and erasure (if you are in the European Union) and use of your Personal Information. Should you wish to do so, kindly contact us through any of the channels stated below in clause 13 of this Privacy Notice.

## **9. Consent**

By consenting to this Privacy Notice you are giving us permission to process your Personal Information for the purposes identified.

You can withdraw this consent by notifying us through the communications channels stated in Clause 13.

## **10. Transfer of Personal Information**

We may transfer your Personal Information across national borders to other countries in compliance with applicable laws. If you are from the European Union or other regions with laws governing data collection and use, you hereby consent to the transfer of your personal information to outside the European Union (or from your country, as applicable), including to the United States. By providing your Personal Information, you consent to any transfer and processing in accordance with this Privacy Notice.

## **11. Marketing**

Marketing emails and communications we send you may be tailored based on your interactions with our websites, products and services. If you do not want us to collect information from the emails or other communications, or you do not want to receive marketing emails from us anymore, you can unsubscribe at anytime by clicking on the unsubscribe link within each email or by emailing us at [hello@hgfoundation.io](mailto:hello@hgfoundation.io). Marketing communications shall cease within 30 days from the date of your notification to us.

## **12. Revisions to the Privacy Notice**

GOLDX reserves the right to amend, modify or update this Privacy Notice from time to time. Any updated version of this Privacy Notice is available on [www.hgfoundation.io](http://www.hgfoundation.io) and our mobile applications and you may visit this website to get the latest Privacy Notice periodically. By continuing to communicate with GOLDX and/or by continuing to use GOLDX's services following any amendment, modification or update to this Privacy Notice shall signify your acceptance to such amendment, modification or update.

## **13. Contacting GOLDX on your Personal Information and this Privacy Notice**

Should you wish to request for access to your Personal Information, request for amendment, correction and erasure (if you are in the European Union) of such Personal Information or provide any feedback to GOLDX in relation to this Privacy Notice, you may contact our Data Privacy Officer as follows:

Email: [hello@hgfoundation.io](mailto:hello@hgfoundation.io)

# GOLDX