



WALLETORY PRIVACY POLICY

February 2020

This Privacy Policy notice ("**Notice**") serves to illustrate how Walletery Pte Ltd ("**Company**", or "**we**"), will use and protect your Personal Data in compliance with the Personal Data Protection Act 2012 (PDPA). We care for your privacy, and therefore, are committed to managing your Personal Data entrusted to us with the attention it deserves. This Notice applies to the Personal Data collected in the Company's website at www.walletery.com, the Company's social media, the Company's mobile application, and any services accessed by you through our website, mobile application, or social media.

This Notice is a document to help you understand how we manage the Personal Data we collect from our clients, as well as why we collect them, how we use them and under what circumstances we will disclose them. Please note that this Notice will be supplementary in addition to any other consent you may have given to us in connection to your Personal Data.

Please be sure to check for any updates to this Notice, which will be made from time to time. We are a company that strives to ensure our information and practices are up-to-date and consistent across the board, and as such, will revise this Notice as new developments and changes in legal and regulatory requirements as well as the industry arise. Any updates will be available on our website at www.walletery.com/walletery-privacy-policy. Should you wish to find out more about how we manage your Personal Data, please contact us at support@walletery.com.

1. Personal Data

In this Notice, "**Personal Data**" means any data which the Company has, or may have access to, upon which can be used to identify a person, whether or not the relevant data is correct. Such Personal Data consist of, but not limited to:

- Personal identification information including but not limited to your name and surname in native language as well as in English language, official identification (such as passport, national identification number, photocopies of your identification documents, driver's license, work permits, residence cards, bank statements and utility bills), photo, nationality, gender, date of birth, place of birth, username, telephone number(s), postal address, e-mail address;
- Bank transaction information such as your bank account details, date, time and transaction amount, payment instrument, details of foreign currency exchange, details of cross-border transactions and detailed information of any electronic money exchange between the sender and the receiver such as name, date, time, location, IP address and information about the device used to process the transaction;

2. Collecting Personal Data

In order to process, administer and manage your relationship with us, it may be necessary for us to collect, use, disclose or process your Personal Data or other personal information. These may include those listed in our products or registration forms.



We are committed to protect your privacy and ensuring security of your information. However, should any performance error occur in our services and have an effect on privacy of your information, we shall not be liable in any manner whatsoever in damages or otherwise.

3. Purpose for the Collection, Use, and Disclosure

We collect, use, disclose or process your Personal Data for the following purposes (“**Purposes**”):

- Processing your application, including but not limited to verifying your identity and evaluating your financial and legal track record, for our goods or services;
- Administering your relationship or account with us;
- Processing any of your request and any necessary investigations relating to your request;
- Carrying out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or by us;
- Carrying out your instructions or responding to any of your enquiries;
- Dealing with any matters relating to the services or products which you are applying for or have already applied for, including mailing correspondences, statements, invoices, reports or notices, processes which involve disclosing certain Personal Data about you in order to carry out the aforementioned delivery, as well as disclosing certain Personal Data on the cover of mail packages;
- Investigating fraud, misconduct, unlawful action or omission, and any suspicion of the aforementioned;
- Complying with applicable law in administering and managing your relationship with us;
- To solve disputes, to comply with our legal obligations, detect and prevent Prohibited Transactions and illegal activities, and
- Any other purposes related to any of the above.

We may also use and process your Personal Data for other marketing and promotional related purposes such as (“**Additional Purposes**”) via post, email, telephone call, SMS, mobile app notification, website, and/or online messaging service:

- Providing or marketing services, products and benefits to you, including promotions, loyalty and reward programmes;
- Sending you details of products, services, special offers and rewards, either to our users generally, or which we have identified may be of interest to you.

By agreeing to our Terms and Conditions, to which this Notice is integral part, you agree that the Purposes and Additional Purposes are reasonable and appropriate.

4. Withdrawal of Consent

You may communicate your objection to our use and/or disclosure of your Personal Data for any of the Purposes or Additional Purposes as stated in this Notice at any time by contacting us at support@walletery.com.



However, please take note that depending on the nature and specifics of your objection, we may not be able to continue to provide our products or services to you or perform on any contract we have with you.

5. Disclosure of Personal Data

Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website; any transmission is at your own risk. Once we have received your information, we will use strict internal procedures and security features to try to prevent unauthorized access. We always take reasonable steps to protect your Personal Data against unauthorised disclosure. To the extent permitted by law, we may transfer or disclose your Personal Data for the Purposes and Additional Purposes stated in this Notice, to the following entities or parties, whether they are located overseas or in Singapore:

- Counterparties and their respective financial institutions in relation to payments and other transactions;
- Monetary Authority of Singapore;
- Agents, contractors or third-party service providers who provide operational services to us, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, client support investigation services or other services;
- Vendors or other third-party service providers, including but not limited to advertisers and event management companies, in connection with promotions and services offered by us;
- Professional advisors and external auditors, including legal advisors, financial advisors and consultants;
- Co-branded and other business partners; and
- Any other party to whom you authorise us to disclose your Personal Data to.

6. Accessing Your Personal Data and Correction Requests

Should you wish to access a copy of or request for correction of your Personal Data held by us, you can submit your request to us via support@walletery.com.

Please note that we may need to ask for identification details during the process to verify your identity. We reserve the right to refuse your requests to access and/or correct your Personal Data for reasons permitted by law, especially but not limited to the Fifth Schedule of PDPA.

7. Retention period

We value your privacy; therefore, we cease to retain your Personal Data at the end of our mutual relationship. Fundamental Personal Data, such as but not limited to name, surname, identification number and number of identification card or passport are kept for period of 5 years after the end of our mutual relationship.

8. Acknowledgement and Consent

By providing your personal information to us, or using our website, or signing up for or accessing products or services we offer during any of our interactions, you are consenting to the following:



- The Company may collect, use, disclose or process your Personal Data for the Purposes and Additional Purposes as described above;
- The Company may collect Personal Data about you from sources other than yourself and use, disclose or process the same for one or more of the Purposes and Additional Purposes as described above; and
- The Company may disclose your Personal Data to our third-party service providers or agents (including its lawyers) for the Purposes and Additional Purposes as described above.

9. Telephone Calls and E-mails

To continuously improve our service, all communications between you and the Company, whether made via telephone calls or e-mails may be recorded and monitored.

10. Use of Cookies

The Company, and third parties with whom we partner, may use cookies, tags, scripts, web objects, advertising identifiers (such as mobile device identifiers including but not limited to Google's Advertising ID) and similar technology ("**Cookies**") during your use of our website, mobile application and social media channels. Cookies may contain unique identifies and are stored or used in, including but not limited to, your computer or mobile device, emails we send to you, and our web pages. By using our website or mobile application, you consent to us on the usage of Cookies.

Cookies may transmit information about you and your use of our service, including but not limited to:

- IP Address;
- Browser and device type;
- Website or mobile application visited before you came to our website or mobile application;
- What page user viewed on our website or mobile application; and
- Time spent on our website or mobile application.

Cookies may be stored persistently or stored only during an individual user session. Cookies enable the Company to provide and develop a more personalized browsing and usage experience on our website and mobile application, and improve the experience of displaying targeted advertising to you.

The Company may allow third parties to use Cookies on our website and mobile application to collect the same type of information. Third parties may be able to associate the information they collect with other additional information they collected about you from other sources. We do not necessarily have access to or control over the Cookies they use.

You may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your internet browser, if you do not wish your Cookies to be collected. You may also use third-party solution such as <https://optout.networkadvertising.org/>. You may also be able to limit our sharing of some of this information through your mobile device settings.