

Personal Data Protection Notice

Your personal data (such as information that identifies you or can be used to identify you, for example your name, date of birth and contact details) is protected by the Singapore Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (the “**PDPA**”). This Personal Data Protection Notice explains how CG and the Escrow Agent will collect, use and disclose your personal data. In the event of any conflict between this Personal Data Protection Notice (or any portion thereof) and any other data protection policy on the Platform, this Personal Data Protection Notice shall prevail.

How we collect your personal data

- (1) From time to time, CG and the Escrow Agent may collect from (a) Customers, (b) third parties, including Relevant Individuals (as defined below) and/or (c) publicly available sources including credit bureaus personal data about the Customer and related parties, including but not limited to the Customer’s beneficial owners, partners, directors, officers or authorised signatories, employees, customers, payors, payees, guarantors, other security providers and other natural persons related to Customer (collectively, “**Relevant Individuals**”). Such personal data may include names, identification particulars, date of birth, contact details and other relevant personal information.
- (2) Information and data may also be generated in the ordinary course of the relationship with CG and the Escrow Agent, for example, through the use of an account on the Platform or when a Relevant Individual gives instructions in respect of the Note in connection with a Customer. Such personal data may include, but is not limited to, signatures, answers to questions intended for security verification, emergency contact numbers or call back contact details.
- (3) Personal data of a Relevant Individual may be processed, kept, transferred or disclosed in accordance with the PDPA.

Deemed Consent

- (4) The Customer will be deemed to have consented (or obtained the consent of the Relevant Individuals) to the collection, use and disclosure of personal data of Relevant Individuals by the Customer’s continued dealing, use of the CG Services, the Escrow Services and/or acceptance of the terms and conditions contained herein.

How we use your personal data

- (5) Information and data may be used and disclosed inside or outside Singapore for the following purposes (collectively, “**Permitted Purposes**”):
 - (i) to provide Services to you including but not limited to the facilitating of funds for Customers, maintaining accurate “know your customer” information, to verify the identities or authorities of Customers and/or their representatives who contact CG and/or the Escrow Agent or may be contacted by CG and/or the Escrow Agent, and to carry out or respond to requests, questions or instructions from Customers and/or their representatives;
 - (ii) to facilitate the maintenance of the e-Wallet and the making and repayment of facilities evidenced by Notes;
 - (iii) to comply with this Agreement and any other terms and conditions as may be stipulated by CG and the Escrow Agent from time to time and at any time;

- (iv) to carry out, monitor and analyse our business;
- (v) to send you marketing material that you have agreed to receive, including but not limited to newsletters sent by us via email, information sent by CG about its products and services via email, text message or phone call;
- (vi) as part of any sales, mergers, or similar change of CG's or the Escrow Agent's business;
- (vii) to comply with any applicable laws, rules, or regulations in any country; and
- (viii) to detect, prevent and investigate fraud.

Parties to whom Personal Data may be Disclosed

- (6) Personal data may be disclosed to the following entities (inside or outside Singapore) for the Permitted Purposes or any other purposes arising out of or in connection with any Permitted Purposes on a need to know basis:
 - (i) any agent, contractor, or third party services provider who provides banking, remittance, administrative, mailing, telecommunications, call centres, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference checks or securities clearing or other services to CG or the Escrow Agent in connection with their business operations;
 - (ii) any person or entity working for CG and/or the Escrow Agent and is under a duty of confidentiality to CG or the Escrow Agent although only to the extent necessary to fulfill the relevant Permitted Purposes;
 - (iii) any person or entity to whom CG or the Escrow Agent is under an obligation or otherwise required to make disclosure pursuant to any applicable laws, including disclosure to courts, tribunals, and/or legal, regulatory, tax and government authorities;
 - (iv) any actual or proposed assignee of CG or the Escrow Agent or transferee of CG's or the Escrow Agent's rights in respect of the Customer, or all or any part of the assets or business of CG or the Escrow Agent;
 - (v) any party giving or proposing to give a guarantee or third party security to guarantee or secure the obligations of the Customer;
 - (vi) any credit bureau (including without limitation Credit Bureau (Singapore) Pte Ltd) as well as the members of such credit bureau;
 - (vii) any party necessary to conduct AML/CTF assessments, and
 - (viii) the government of Singapore, any division, or department of the government of Singapore upon its request.
- (7) If you have given false or inaccurate information or CG and/or the Escrow Agent suspect fraud CG and/or the Escrow Agent will record this and may pass this information to fraud prevention and law enforcement agencies.

How long personal data will be kept

- (8) CG and the Escrow Agent will keep your personal data for no longer than is necessary for the Permitted Purposes described in this Personal Data Protection Notice or to meet legal and regulatory requirements.

Your rights in respect of your personal data

- (9) You have certain rights under the PDPA, including the right to access, update or correct the personal data we hold about you or withdraw your consent to the use, collection and disclosure of your personal data (subject to certain exceptions).
- (10) To request access to your personal data, please email help@crowd-genie.com. We may make a small charge for this service.
- (11) If you have any questions about this Personal Data Protection Notice, or if you wish to access, update or correct your personal data or withdraw your consent to the use, collection and disclosure of your personal data in accordance with this Personal Data Protection Notice, please email [help@crowd-genie.com]. Please note that if you withdraw consent, CG and the Escrow Agent may still be permitted to hold, use or disclose some of your information as required or permitted by law.

CG's personal data protection policy can be accessed at help@crowd-genie.com.