

This Privacy Notice sets out how Merchantrade Asia Sdn Bhd (“Merchantrade”), will handle personal information in accordance with the Personal Data Protection Act 2010 (“PDPA”) and the laws of Malaysia.

1. What This Privacy Notice Explains

This Privacy Notice explains:

- What kind of personal information we collect
- How we collect your personal information
- How we use your personal information
- When we disclose your personal information
- How we secure your personal information
- Access to and correction of your personal information
- Transfer of your personal information
- Online dealings with us

Please note that this Privacy Notice does not cover personal information collected or held by us about our employees and is to be read subject to any overriding provision of law or contract.

2. Our Commitment To You

We value the trust of our customers and business partners and are committed to protecting your personal information and ensuring that your personal information is used only for the purposes stated herein.

3. Defining Personal Information

Personal information refers to any information, which relates directly or indirectly to you. This includes any information that can be used to distinguish, identify or contact you.

4. What Kind Of Personal Information We Collect

Because of the nature of the business and financial transactions carried out by us, it In order for us to operate in an efficient and effective manner and provide you with the best service possible, we may collect personal information including but not limited to:

- your contact information, such as your name, race, address(es), telephone number(s), email address(es), national identification card details, passport details, occupation details, bank account information, salary range, source of funds and other relevant contact information;
- contact information of other persons that are privy to your fund transfer (e.g. the beneficiary of your remittance order), such as the beneficiary’s name, address(es), telephone number(s), national identification card details, bank account information and other relevant contact information;
- information relating to your transaction history with us;
- information captured on security systems, including a recording of your image on Closed Circuit Television (CCTV) and a recording of your voice from calls made to us; and/or information you provide us regarding your marketing preferences or in the course of participating in surveys, contests or promotional offers.
- Information required to be collected in compliance with Money Services Business Act 2011, Anti Money Laundering & Anti-Terrorism Act, 2001, Payment System Act 2003

and Financial Services Act 2012, Communication and Multimedia Act 1998 and such other laws and regulations as may be applicable from time to time.

Where you provide us with the personal information of the beneficiary of your remittance order, you confirm that you have obtained the prior consent of your beneficiary(ies) to provide us with their personal information and to view or change their information.

5. How Do We Collect Your Personal Information?

We may collect personal information directly from you when you:

- buy a product or service from us or from our authorized agents (including buying products or services online);
- register for our services and/or by setting up an account with us;
- process or transmit funds over the counter
- subscribe to one of our publications by electronic, print or other media (for example exchange rate broadcast, newsletters and brochures)
- ask us for more information about a product or service (through verbal and/or written communication);
- from the financial transaction(s) you make
- contact us with a query or complaint;
- respond to a competition, prize draw or survey; and/or
- visit or browse our website or the websites of our affiliates, authorised partners, resellers or agents.

Other than personal information obtained from you directly (as laid out above), we may also obtain your personal information from third parties we deal with or connected with you, for example from communications service providers, financial institutions, credit reporting agencies and from such other sources in respect of which you have given your consent to disclose information relating to you and/or where otherwise lawfully permitted. We also use Closed Circuit Television (CCTV) to record footage at our premises.

6. How We Use Your Personal Information

We may collect personal information from you or from the category of third parties identified above which is to be utilized for one or more of the following purpose: –

- to process your order for our products or services, as well as to keep you updated with the progress of your order;
- for identification and verification purposes;
- to ensure the completion of your remittance order(s);
- to keep you informed of our new products and services;
- to contact you with offers or promotions based on your usage of our products or services (e.g. your calling and messaging activities, frequent country(ies) you remit money to, etc.)
- to provide you with customer support and services;
- to respond to any queries or complaints you may have about using our products or services;

- to carry out research and statistical analysis, and monitor customer usage of our products and services on an anonymised basis;
- to be retained for use in your future transactions with us;
- to prevent and detect fraud, money laundering or any other crimes; and/or
- to comply with legal and regulatory requirements.

CCTV footage at our branches, in particular, may also be used for the following purposes:

- for quality assurance purposes;
- to provide for the safety and security of staff and other customers;
- detecting and deterring suspicious, inappropriate or unauthorised use of our facilities;
- detecting and deterring criminal behavior;
- to comply with legal and regulatory requirements; and/or
- conducting incident investigations.

7. Disclosure of Your Personal Information

As a part of providing you with our products and services and the management and/or operation of the same, we may be required or need to disclose information about you to the following third parties:

- companies and/or organisations that act as our agents, partners, service providers and/or professional advisers, and such parties as necessary to comply with legal and regulatory requirements;
- financial institutions that assist us in processing and/or otherwise fulfilling transactions that you have requested (including the financial institution acting on behalf of the beneficiary of your remittance order);
- our business associates and other parties for purposes that are directly related to the purpose of collecting your personal information; and/or
- other parties in respect of whom you have given your express or implied consent;
- our prospective or new owners(if any) in which instance , we would require them to adopt a policy of similar nature to protect your personal data. subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to Merchantrade.

8. Security of Your Personal Information

We take all reasonable precautions to ensure your personal information is protected against unauthorized or accidental loss, misuse, modification, disclosure or destruction. However, we cannot warrant or guarantee the security of personal information we transmit online, and assume no liability for alteration, interception or misuse of information transmitted via the internet.

9. Direct Marketing

We may use your personal information to provide you with information about our and third party services and/or products, which may be of interest or benefit you, except where otherwise requested by you.

In certain instances, we may disclose your relevant personal information to our preferred merchants and strategic partners where your prior consent has been obtained and subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to us. We take

reasonable steps to make sure that our agreements with service providers include appropriate privacy and confidentiality obligations.

If you do not wish your personal information to be utilised for the purposes of marketing or should you change your mind in relation to your previous decision, please contact us at the address detailed at the end of this Privacy Notice. We will abide by your latest written instructions to us.

10. What If Personal Information Provided By You Is Incomplete?

Where indicated (for example in registration forms), it is obligatory to provide your personal information to us to enable us to process your application for our services and/or products. Should you decline to provide such obligatory personal information, we may not be able to process your application or provide you with our services or products.

11. Your Rights To Access And Correct Your Personal Information

Where you wish to have access to your personal information in our possession, or where you are of the opinion that such personal information held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us via our Data Access Request Form or Data Correction Request Form respectively. These forms are available at our branches.

We will use reasonable efforts to comply with your request to access or correct your personal information within 21 days of receiving your duly completed Data Access Request Form/Data Correction Request Form and the relevant processing fee (if any).

Should you, however, be a Member of our online e-remittance services and wish to correct, delete or update your basic personal information at any time, you may do so by logging in to your account at www.eremit.com.my and effecting the changes yourself.

Please note that we 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.

12. Transfer of Your Personal Information

Some or all of the information that you provide us with will be required to be transferred outside of Malaysia in order to process your fund transfers. Strict rules regarding the confidentiality and safety of your information are in place to safeguard it. The transfer of your information may be made to our databases in other countries, as well as to third parties, such as financial institutions outside of Malaysia, to be processed. It should be noted however, that not all of these countries outside Malaysia have an "adequate level of protection" for personal information, but we will nevertheless try to take every precaution in securing the safety of any of your personal information as outlined in this Privacy Notice.

13. Information We Collect When You Visit Us Online

If you choose to obtain information or do business with us online by visiting www.mtradeasia.com, www.merchantrademoney.com, www.eremit.com.my, www.eforex.com.my and www.merchantrade.com.my, you may wish to know the following:

Merchantrade Website

When you visit our Website, we collect standard internet log information and details of visitor behavior patterns to ascertain the number of visitors to the various parts of the Website. Such information is not linked to you as an individual. We use such information to evaluate and improve the features, guest experience and functionality of our Website.

Cookies

We collect information about your use of our website from cookies. Cookies are packets of information stored in your computer which assist your website navigation by customizing site information tailored to your needs. Cookies in themselves do not identify the individual user, just the computer used. You are not obliged to accept cookies. If you are concerned, you can set your computer either to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time. However, rejection of cookies may affect your use of the website as we will be unable to personalize aspects of your use of the website.

Further information about cookies and how they work is available at www.allaboutcookies.org. To opt out of being tracked by Google Analytics across the Website please visit <http://tools.google.com/dlpage/gaoptout>

Links To Third Party Websites

Please be informed that this Privacy Notice applies solely to our Website and does not apply to any third party websites you may access from our Website. Merchantrade is not responsible for the privacy policies or the content of such websites as they may have privacy policies independent of Merchantrade. To determine how these third party websites (e.g. Twitter, Facebook, YouTube) deal with your Personal Information, you should ensure that you read their respective privacy policies.

14. Updates To Our Privacy Notice

We may amend this Privacy Notice from time to time. Please check our website on an ongoing basis for information on our most up-to-date practices.

15. English Version

In the event this Privacy Notice is translated into a language other than English, it is done solely for convenience purpose, with only the English version of this Privacy Notice being valid and binding.

16. Our Contact Details

Should you have any queries, concerns or complaints in relation to this Privacy Notice, kindly contact us during office hours (between 9.00 am to 5.00pm from Monday to Friday) at the following contact points:

Attn: Data Privacy Officer

Telephone: +603-7727-8606

E-mail: privacy@mtradeasia.com

Address: Suite 1632, 16th Floor, Lobby 7, Block A, Damansara Intan, No. 1 Jalan SS20/27, 47400 Petaling Jaya, Selangor Darul Ehsan.

A current version of this Privacy Notice is available on our website at www.mtradeasia.com, www.merchantrademoney.com, www.eremit.com.my, www.eforex.com.my and www.merchantrade.com.my,