

PRIVACY POLICY

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1. Introduction

VGroup Holdings Pte. Ltd., ("**VGroup**", "we", "our", "us") is bound by the Personal Data Protection Act 2012 of Singapore ("**PDPA**") and the Personal Data Protection Regulations 2021 ("**PDPR**").

This Privacy Policy describes how we collect, use, disclose and protect Personal Data (as defined below) in connection with our business and our website.

Where it is necessary to do so, we also comply with the EU General Data Protection Regulation ("**GDPR**"); where the obligations of the PDPA and the GDPR are substantively the same but expressed differently, our compliance with the PDPA constitutes our compliance with the GDPR.

In this Privacy Policy:

Personal Data means data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which the organisation has or is likely to have access.

Data Protection Officer means the person designated by VGroup under section 11 of the PDPA, who is the contact person for questions and complaints about VGroup's handling of Personal Data.

The latest Privacy Policy is published on our website at <https://vgroup.sg> and is available free of charge.

2. Personal Data we collect

We may collect a range of Personal Data about you to provide our services, including but not limited to the following:

- name;
- address;
- telephone and email contact details;
- date of birth;
- information relating to income and source of wealth;
- occupation;
- credit/debit card and bank account details;
- identification documents required under applicable anti-money laundering, counter-terrorism financing or sanctions laws (including under the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act 1992 and the Terrorism (Suppression of Financing) Act 2002), such as passports, identity cards (including NRIC and FIN), driver's licences, utility bills and trust deeds; and
- any other information relevant to the services we provide.

We collect Personal Data about clients and prospective clients, their agents, directors, officers, trustees, partners and beneficial owners; service providers and suppliers; prospective employees, employees and contractors; and other third parties with whom we come into contact.

3. How we collect Personal Data, and our lawful basis

We generally collect Personal Data directly from you, through our application processes, forms and other interactions in the course of providing our services.

We may also collect Personal Data from third parties, such as electronic verification services, referrers and marketing agencies.

If the Personal Data we request is not provided, we may not be able to provide our services to you.

In accordance with section 13 of the PDPA, we collect, use or disclose Personal Data only with your consent (express or deemed) or where an exception under the PDPA applies.

The exceptions on which we may rely include:

- where the collection, use or disclosure is required or authorised under any other written law (section 4(6) of the PDPA);
- where it is necessary for any investigation or proceedings; where we rely on the Legitimate Interests Exception, having regard to a documented assessment that our or another person's legitimate interests outweigh any adverse effect on you; and
- where it is necessary to respond to an emergency that threatens the life, health or safety of an individual.

In accordance with section 20 of the PDPA, we will notify you of the purposes for which we intend to collect, use or disclose your Personal Data on or before such collection, use or disclosure, unless an exception under the PDPA applies.

4. Why we collect Personal Data

We use and disclose Personal Data for the following purposes:

- to provide our services;
- to communicate with you about our services, regulatory or industry developments, and matters relevant to our engagement with you;
- to consider concerns or complaints;
- to comply with applicable laws and regulatory obligations;
- to conduct identity verification, sanctions screening, adverse media checks, conflicts checks, fraud detection and other compliance and risk management activities, in reliance, where appropriate, on the Legitimate Interests Exception under the PDPA;

- subject to your separate consent (or deemed consent under the PDPA) and our compliance with section 10 below, to send you communications about other services we offer, special offers or invitations to events;
- to maintain and improve our services; and
- any other purpose to which you have consented, or that is otherwise permitted or required by law.

We will use and disclose your Personal Data only for the purposes for which we have collected it, except where:

(a) you have given separate consent;

(b) deemed consent applies under the PDPA (including deemed consent by notification under section 15A); or

(c) an exception under the PDPA permits the use or disclosure without your consent.

5. Who we share Personal Data with

We may disclose Personal Data to:

- a related entity of VGroup;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants or other advisers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
- identity verification, sanctions screening and similar electronic verification service providers (in connection with our customer due diligence and AML/CTF/sanctions obligations);
- regulatory bodies, government agencies, law enforcement bodies and courts; and
- anyone else to whom you authorise us to disclose it or is required by law.

Where we disclose Personal Data to service providers acting on our behalf, we require them by contract to use the Personal Data only for the purposes for which we have provided it, to maintain a standard of protection comparable to that under the PDPA, and to notify us promptly of any actual or suspected data breach.

6. Transfers outside Singapore

We may transfer Personal Data to recipients located outside Singapore. Where we do so, we comply with section 26 of the PDPA and the Transfer Limitation Obligation under the PDPR, including by entering into written contracts containing data protection terms, relying on intra-group binding corporate rules, or relying on any other transfer mechanism recognised under the PDPA, the PDPR or, where applicable, the GDPR.

7. Security of Personal Data

In accordance with section 24 of the PDPA, we make reasonable security arrangements to protect Personal Data in our possession or under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal, and against loss of storage media.

8. Cookies

Our website uses cookies, which are small text files transferred to your device when you visit our website. Some cookies are strictly necessary for the website to function. For non-essential cookies (such as analytics, performance and marketing cookies), we will request your consent before placing them on your device, where required by applicable law. Where cookies collect or process Personal Data, we will handle that Personal Data in accordance with the PDPA and this Privacy Policy. We retain Personal Data collected through cookies only for as long as is necessary for the purposes for which it was collected. You can use your browser settings to accept, refuse or delete cookies; if you do so, some features of our website may not be available.

9. Data breach notification

We have implemented procedures to detect, contain and respond to data breaches involving Personal Data. Where a data breach occurs that is likely to result in significant harm to affected individuals, or that is or is likely to be of a significant scale, we will notify the Personal Data Protection Commission and affected individuals as required under Part 6A of the PDPA. Where the GDPR applies, we will also comply with the relevant data breach notification requirements.

10. Direct marketing and Do Not Call

We use Personal Data for direct marketing only with your consent (express or deemed under the PDPA), or where the use is otherwise permitted by law. You may opt out of direct marketing at any time by contacting our Data Protection Officer, and we will give effect to your request within a reasonable period.

Where you provide us with a Singapore telephone number, we will, before sending any specified messages within the meaning of Part 9 of the PDPA, comply with our obligations under the PDPA, including by checking the relevant Do Not Call Register where required. Where we send unsolicited commercial electronic messages in bulk to email addresses or mobile telephone numbers, we will comply with the Spam Control Act 2007 of Singapore.

11. Retention of Personal Data

In accordance with section 25 of the PDPA, we retain Personal Data only for as long as it is necessary for the purposes for which it was collected, or as required by applicable laws, regulations or professional standards (including, where relevant, requirements relating to the retention of records of advice, transaction records and customer due diligence documentation). When Personal Data is no

longer required for any legal or business purpose, we destroy, anonymise or otherwise dispose of it securely.

12. National identifiers

We collect, use or disclose government-issued identifiers (such as NRIC, FIN, work pass numbers, passport numbers and driver's licence numbers) only where required by law or necessary to accurately establish or verify your identity to a high degree of fidelity, in accordance with the PDPA, the PDPR and the PDPC's guidelines on the use of national identification numbers.

13. Your rights — access, correction, withdrawal of consent

You may at any time, by contacting our Data Protection Officer:

- **request access** to the Personal Data we hold about you, and to information about the ways in which it has been or may have been used or disclosed within the year before your request. We will respond within 30 business days, or where this is not possible, will inform you of the time by which we will respond. We may charge a reasonable administrative fee, and may require identity verification;
- **request correction** of inaccurate or incomplete Personal Data. We will take reasonable steps to correct it within 30 business days, free of charge, and will send the corrected Personal Data to any organisation to which we disclosed it within the year before correction (unless that organisation does not require the corrected data for any legal or business purpose); and
- **withdraw any consent** you have given (or are deemed to have given) to our collection, use or disclosure of your Personal Data. We will inform you of the likely consequences. The withdrawal of consent does not affect any collection, use or disclosure that is taking place in reliance on an exception under the PDPA, or that we are otherwise required or permitted by law to continue.

Where the GDPR or another applicable data protection law affords you additional rights (such as data portability, restriction of processing, objection or rights in respect of automated decision-making), you may exercise those rights through our Data Protection Officer.

14. Complaints and contact

If you have any questions about this Privacy Policy or wish to make a complaint about how we have handled your Personal Data, please contact our Data Protection Officer:

Data Protection Officer

VGroup Holdings Pte. Ltd.

38 Beach Road, #32-12, South Beach Tower, Singapore 189767

Email: vivian.hung@vgroup.sg

If you are not satisfied with our response, you may refer your complaint to the Personal Data Protection Commission of Singapore by calling +65 63773131 or filling the online form at <https://www.pdpc.gov.sg/individuals/e-services/report-a-data-protection-concern>.

15. Updates to this Privacy Policy

We will review this Privacy Policy from time to time to reflect changes in laws, technology and our operations. The current version is published on our website. By continuing to use our website or services after an updated version is published, you acknowledge the updated Privacy Policy.