

SDAX PRIVACY POLICY

Last Updated on 26 January 2022

1. OVERVIEW

- 1.1. As a MAS-regulated digital assets exchange, SDAX Exchange Pte. Ltd (“we”, “our” or “SDAX”) is committed to protecting Personal Data and complying with applicable laws in a trustworthy, transparent and responsible manner.
- 1.2. These terms (“**Privacy Policy**”) set out how we collect, use, manage and protect your Personal Data for purposes of the Singapore Personal Data Protection Act (“**PDPA**”), and other applicable data protection and privacy laws.
- 1.3. By visiting our website (<https://www.sdax.co/>) (the “**Website**”) and using our digital asset exchange (the “**Exchange**”), you agree to be bound by the terms of the Privacy Policy, as may be revised or updated by us from time to time, and consent to us collecting, using and disclosing your Personal Data in the manner set forth below.

2. TYPES OF PERSONAL DATA COLLECTED

- 2.1. We define “**Personal Data**” to mean data which can be used to uniquely identify an individual. Personal data can be collected from various sources and processed by us.
- 2.2. Some types of Personal Data which we may collect from visitors to our Website and users of our Exchange include:
 - (a) **Identity and contact data**, which includes
 - (i) personal particulars provided when registering or opening an account with us;
 - (ii) your specimen signature(s);
 - (iii) images and voice recordings of our conversation with you;
 - (b) **Financial data**, which includes
 - (i) your payment related information, such as your bank account details;
 - (ii) your employment history, education background, and income levels;
 - (c) **Electronic data**, which includes
 - (i) details about the devices and technology you use including internet protocol address, device identifier, log files and cookies (please see specific information collected in our [Cookie Policy](#));
 - (ii) your login data, and other technology on the devices you use to access our Website, Exchange or other products and services;
 - (d) **Transaction data**, which includes
 - (i) information regarding transactions that you effect over our Website and Exchange;
 - (e) **Blockchain data**, which includes blockchain address and public keys, data contained within smart contracts; and

- (f) other Personal Data that you or your representative (such as your employer, financial services provider, legal representative, company where you are an officer, director or significant shareholder) may provide to us from time to time.

2.3. Through third parties or public domain, we may also collect the following types of information:

- (a) Information about you available in news feeds, exchange data feeds and other public data sources (including the public internet);
- (b) Information provided by relevant regulators, government agencies and non-government credentialing or professional organizations;
- (c) Information related to your status under economic sanctions, anti-money laundering and similar laws or other information that may impact our ability to engage in business with you or a company at which you are an employee, officer or director or significant shareholder;
- (d) Information that you, your employer or other representative makes publicly available via your personal or company website or in social media profiles;
- (e) Information from event organizers for events that you have attended;
- (f) Information from companies providing professional contact information to their customers/subscribers; and
- (g) Other Personal Data to the extent permitted by applicable law and reasonably necessary for the performance of our business obligations, compliance with laws applicable to our business or pursuit of our legitimate business interests.

3. HOW WE COLLECT PERSONAL DATA

3.1. Generally, we collect Personal Data in one or more of the following ways:

- (a) when you submit such data to us, directly or indirectly, which may be through forms or applications made to us;
- (b) when you interact with us, whether over the internet, telephone, via email, in person or otherwise;
- (c) when you undertake any transactions using our computer systems, Website, Exchange or any such network;
- (d) through our affiliates;
- (e) when you take part in events organised solely or jointly by us and/or any third parties;
- (f) through third parties or the public domain; and/or
- (g) through the use of cookies or similar technology when you use our Website or Exchange (in this regard, please see our [Cookie Policy](#)).

3.2. In certain circumstances, you provide us with Personal Data of other people (e.g., information of entities you represent, your dependents, spouse, children and/or parents). By submitting such information to us, you represent and warrant to us that they have read and understood this Privacy Policy and that you have obtained the requisite consent of such third party and/or are authorized to provide us with such Personal Data for the relevant purposes contained in this Privacy Policy.

- 3.3. You are to ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so or where you decline to provide certain Personal Data we require, may result in our inability to provide you with the relevant services/ support. This is also the case where we require certain Personal Data and you decline to provide this.

4. USE OF PERSONAL DATA

- 4.1. We generally collect, use and disclose your Personal Data and Personal Data you pass to us for the following purpose(s):

(a) For General Support and Account Administration

- (i) sending you notices, communications, updates, statements of account and invoices;
- (ii) conducting due diligence checks, sanctions screenings and any other processes to meet any regulatory or compliance requirements, including but not limited to anti-money laundering and financial crime laws and government sanctions;
- (iii) verifying your identity before allowing you access to use the functionality of our Exchange;
- (iv) processing applications for products and services, effecting payments, transactions and completing instructions or requests; or
- (v) responding to any of your queries, applications, feedback, complaints or disputes.

(b) For Internal Operations

- (i) administering our Website and Exchange to improve our products and services, support security measures and business operations, and complying with internal policies and procedures;
- (ii) administer and manage our relationship with you;
- (iii) personalise our services to you;
- (iv) publish or use information about you in accordance with our Platform Terms and Conditions;
- (v) assess your suitability for products and services;
- (vi) carrying out research, planning and statistical analysis;
- (vii) facilitate any other purposes reasonably related or ancillary to the above purposes;
- (viii) facilitate any other purposes for which your specific consent was obtained or given; and
- (ix) comply with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;
- (x) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes; or
- (xi) in connection with performance of our duties and obligations when seeking consultancy or professional advice, including legal advice.

(c) For Marketing Purposes

- (i) send you marketing and promotional materials relating to our services (through EDMs, direct mailers, telephone calls, social media, third party sites and other such means);
- (ii) conduct market research and surveys with the aim of improving our products and services; and
- (iii) facilitate other marketing purposes, promotional events, lucky draws and competitions.

4.2. With your data, we may also utilize certain software that uses machine intelligence and learning to identify situations that potentially constitute market abuse, insider trading, fraud or violations of our published rules. Such software relies on identifying patterns indicating misconduct based on past activity. The conduct involved may include conduct by a corporate member, trading algorithm or individual action. Alerts are referred for investigation by our surveillance team which determines which actions to take based on our published rules and applicable law. We will not engage decision-making based solely on automated processing, including profiling, which produces legal effects concerning an individual or similarly significantly affects an individual.

4.3. For some purposes in connection with the service you have requested, we have a legal or regulatory obligation to process your Personal Data. These purposes include:

- (a) the prevention, detection, investigation and prosecution of crime in any jurisdiction (including, money laundering, terrorism, fraud and other financial crime);
- (b) identity verification, government sanctions screening and due diligence checks; and
- (c) to comply with: local or foreign law, regulations, directives, judgments or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency, or exchange body.

5. DISCLOSURE AND SHARING OF PERSONAL DATA

5.1. We may, from time to time, disclose your Personal Data to any of our affiliates or to third parties, whether located in Singapore or elsewhere, for any of the purposes specified above, including but not limited to the following:

- (a) our officers, employees, agents or directors;
- (b) professional advisers (including auditors), third party service providers, agents or independent contractors providing services to support our operations and business;
- (c) our business alliance partners who may provide their product or service to you (to the extent allowable by applicable law);
- (d) upon your death or mental incapacity, your legal representative and their legal advisers, and a member of your immediate family for the purpose of allowing him or her to make payment on your account;
- (e) any person to whom disclosure is allowed or required by local or foreign law, regulation or any other applicable instrument;
- (f) any court, tribunal, regulator, enforcement agency, exchange body, tax authority, or any other authority (including any authority investigating an offence) or their agents;

- (g) any debt collection agency, credit bureau or credit reference agency, rating agency correspondents, insurer or insurance broker, direct or indirect provider of credit protection and fraud prevention agencies; and
- (h) any financial institution to conduct credit checks, anti-money laundering related checks, for fraud prevention and detection of crime purposes.

5.2. Where we disclose your Personal Data to such parties, we require them to ensure that any Personal Data disclosed to them are kept confidential and secure.

5.3. We may transfer your information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets, provided that we require any such third party to maintain the confidentiality of your information and protect it with appropriate technical and organizational security measures.

5.4. We may transfer, store, process and/or deal with your personal data outside Singapore. In doing so, we will comply with the PDPA and other applicable data protection and privacy laws, such as the GDPR.

6. MONITORING

6.1. To the extent permitted by law, we may record and monitor your electronic communications with us to ensure compliance with our legal and regulatory obligations and internal policies for the purposes outlined above.

7. MARKETING, AUTOMATED DECISIONS AND PROFILING

7.1. We may use your Personal Data to send you marketing and promotional materials relating to our services (through electronic data mailers, direct mailers, telephone calls, social media, third party sites and other such means). We may also conduct market research and surveys with the aim of improving our products and services, or send you communications in relation to promotional events, lucky draws and competitions. To learn more about the technology in our Website and how to disable some of this technology, visit our comprehensive [Cookie Policy](#).

7.2. We process your Personal Data for these purposes because it is in the interest of our business to do so with the intention of improving our products and services and generating business. Our officers and employees may from time to time contact you to discuss products and services designed to suit your investment objectives and interests.

7.3. We will only send you marketing material when we receive your consent and in line with your preferences on the communications that you have indicated. You may opt-out or retract your consent to receive such communications at any time. If you ask us not to send you marketing material or other promotional or research material you have subscribed to receive, we will need to retain a record that you have asked us not to do so to ensure that you do not receive anything further.

7.4. We may use profiling, including behavioural analysis, to assist us to provide you with better services, to make decisions and to prevent money laundering, terrorism, fraud and other financial

crime. If any profiling will result in an automated decision relating to you, we will let you know and you will have the right to discuss the decisions with us.

8. ACCESS AND CHANGES TO PERSONAL DATA

- 8.1. You may, at any time, contact us, in the manner specified below, to request changes to or to obtain information about the Personal Data that we have collected from you and how we have used it, as well as to change your specific marketing-related preferences.
- 8.2. Please note that we are not required, under the PDPA, to allow access to and correction of Personal Data in certain situations. The PDPA also allows us, and we reserve the right, to charge a reasonable fee for the handling and processing of any requests to access Personal Data.
- 8.3. We may require up to 3 weeks from the date of notification to duly respond to a request for access or correction of Personal Data and to effect any necessary changes (including, where applicable, conveying such request or notification to any relevant third party that we work with).

9. RETENTION OF YOUR PERSONAL DATA

- 9.1. We will retain your Personal Data as long as the purpose for which it was collected remains, in line with our legal and regulatory obligations and for business and operational purposes. In the majority of cases, this will be for seven (7) years from the end of your relationship with us.

10. PROTECTION OF YOUR PERSONAL DATA

- 10.1. We will implement reasonable security arrangements to maintain the confidentiality and to prevent any unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to or of any Personal Data in our possession (including, using firewalls and other technology or security procedures to secure our computer network and prevent unauthorized access to the network).
- 10.2. We will take reasonable steps to ensure that any third party who receives Personal Data from us protects such data in a manner consistent with this Privacy Policy and will not use such Personal Data for any purpose(s) other as specified by us, in accordance with the terms of this Privacy Policy. Wherever possible, these obligations will be incorporated into the terms of our written agreements with such third parties.
- 10.3. You should be aware that the internet is not a secure form of communication and sending us any Personal Data over the internet carries with it risks including the risk of access and interference by unauthorised third parties. For the avoidance of doubt, we will not be responsible in any way for the security or management of any Personal Data accessed by unauthorised third parties and Personal Data which you share with any third-party websites including those accessible via links on our website. If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please contact us immediately.

11. UPDATES TO OUR PRIVACY POLICY

- 11.1. We may from time to time update the terms of the Privacy Policy to ensure compliance with applicable laws and regulatory requirements, and to ensure consistent with future developments. Such updates will be duly uploaded onto our Website and made available to registered users of our Exchange. All changes will be posted on this page.
- 11.2. Subject to your rights at law, you agree to be bound by the prevailing terms of this Privacy Policy as updated from time to time on this website. Please check back regularly for updated information on the handling of your Personal Data.

12. COMMUNICATIONS AND NOTIFICATIONS PURSUANT TO THIS PRIVACY POLICY

- 12.1. If you have any questions or wish to send us any communication or notification regarding this Privacy Policy or any of your Personal Data in our possession, you may write to or contact our designated Data Protection Officer at:

Email:	support@sdax.co
Tel:	+65 6991 2800
Attention:	Data Protection Officer