

PRIVACY POLICY

We, GuildFi, give importance to your private data protection and privacy, thus, we provide this privacy policy to inform you of our policy in relation to the collection, use and disclosure of personal data of individual in accordance with the Personal Data Protection Act (“PDPA”), relevant laws and regulations. This privacy policy informs you of how we collect, use or disclose your personal data, what and why we collect, use or disclose your personal data, how long we hold it, who we disclose it to, your rights, what steps we will take to make sure your personal data stays private and secure, and how you can contact us.

- **Personal Data**

“**Personal Data**” means any information that can be used to identify a natural person, both directly or indirectly, but shall not include, in particular, any information concerning deceased persons (as defined in PDPA).

- **What personal data we collect, use or disclose**

The type of personal data, namely personal data and sensitive personal data, which we collect, use or disclose, varies on the scope of products and/or services that you may have used or had an interest in. The type of personal data shall include but not limited to:

Category	Examples of personal data
Personal details	<ul style="list-style-type: none">• Given name, middle name, surname, hidden name (if any)• Gender• Date of birth• Age• Educational background• Marital status• Nationality
Contact details	<ul style="list-style-type: none">• Mailing address• E-mail address• Phone number• Facsimile Number• Name of representatives or authorised persons/directors acting on behalf of our customers• Social media accounts

<p>Identification and authentication details</p>	<ul style="list-style-type: none"> • Identification card photo • Identification number, laser number (back of identification card) • Passport information • Certificate/Alien ID information • Driving license • Signatures
<p>Employment details</p>	<ul style="list-style-type: none"> • Occupation • Employer’s details and workplace • Position • Salary/ income/ remuneration
<p>Financial details and data relating to your relationship with us</p>	<ul style="list-style-type: none"> • Data relating to products and/or services you use • Channels you use and ways you interact with us • Your customer status, your ability to get and manage credit, your payment history, transaction records • Data relating to your transactions (e.g. your wallet address)
<p>Market research and marketing data</p>	<ul style="list-style-type: none"> • Customer survey • Data and opinions expressed when participating in market research (e.g. your responses to questionnaires, surveys, requests for feedbacks, and research activities) • Details of services you receive and your preferences • Inferences about you based on your interactions with us • Communication preferences and details or content of your communications with us
<p>Geographic data and data relating to your device and your software, and technical details</p>	<ul style="list-style-type: none"> • Your GPS location • IP address • Technical specifications and uniquely identifying data (e.g. location, web beacon, log, device ID and type, network, connection details, access details, access date and times, duration of usage, cookies, search history, browsing details, IMEI (International Mobile Equipment Identity) of mobile phone or other unique device identifier, details relating to mobile phone, and other technology on devices you use)
<p>User login, subscription data, and profile details</p>	<ul style="list-style-type: none"> • Login data for using our system, online internet transaction, and applications • Username, password and other verification code • Interests, preferences and activities

Usage details	<ul style="list-style-type: none"> • Data relating to your usage of websites, platforms, products and services • Data relating to your usage and interaction with our advertising (including content viewed, links clicked, and features used)
Data concerning security	<ul style="list-style-type: none"> • Records of correspondence and other communications between you and us, in whatever manner and form, including but not limited to phone, email, live chat, instant messages and social media communications • Visual images • Personal appearance • Detection of any suspicious and unusual activity • CCTV images or recordings • Video recordings
Sensitive personal data	<ul style="list-style-type: none"> • Biometric data (e.g. face recognition, fingerprint, voice recognition and retina recognition)
Other data	<ul style="list-style-type: none"> • Records of correspondence and other communications between you and us, in whatever manner and form, including but not limited to phone, email, live chat, instant messages and social media communications • Data that you provide to us through any channels

○ **How we collect, use or disclose your personal data**

We only collect, use or disclose your personal data where it is necessary or there is a lawful basis for collecting, using or disclosing it. This includes where we collect, use or disclose your personal data based on the legitimate grounds of legal obligation, performance of contract made by you with us, our legitimate interests, performance under your consent and other lawful basis. Reasons for collecting, using or disclosing are provided below:

1. Our legal obligation: we are regulated by many laws, rules, regulations, and orders of any competent governmental, supervisory or regulatory authorities, and to fulfil our legal and regulatory requirements, it is necessary to collect, use or disclose your personal data for compliance with laws and regulatory obligations and/or orders of authorized persons (e.g. orders by any court of competent jurisdiction or of governmental, supervisory or regulatory authorities or authorized officers).

2. Contract made by you with us: we will collect, use or disclose your personal data in accordance with the request and/or agreement made by you with us, for the following purposes, which include but not limited to:

a) process your request prior to entering into an agreement, consider for approval and provide products and/or services, and deliver products and/or services to you, provide advice and deal with all matters relating to products and/or services, including any activities that if we do not proceed, then our operations or our services may be affected or may not be able to provide you with fair and ongoing services;

b) authenticate when entering into, doing or executing any transactions;

c) carry out your instructions;

d) provide online services and other online product platforms;

e) track or record your transactions;

f) produce reports (e.g. transaction reports requested by you or our internal reports);

g) notify you with transaction alerts and notify the due date of products and/or services;

h) recover the money which you owe (e.g. when you have not paid for your debt and/or outstanding fees);

i) carry out account maintenance and operations relating to your user accounts, including but not limited to processing your applications or requests for services or products, processing your transactions, generating statement of your user accounts, and operating and closing your user accounts;

j) carry out or make transactions and/or payments (e.g. processing payments or transactions, fulfilling transactions, billing or processing activities, managing your relationship with us, and administering your account with us);

k) enforce our legal or contractual rights; and/or

l) provide IT and helpdesk supports, create and maintain codes and user accounts for you, manage your access to any systems to which we have granted you access, and remove inactive accounts.

3. Our legitimate interests: we rely on the basis of legitimate interests by considering our benefits or third party's benefits with your fundamental rights in personal data which we will collect, use or disclose for the following purposes, which include but not limited to:

a) conduct our business operation and the business operation of our group companies (e.g. to conduct compliance audit, to conduct risk managements, to conduct finance and accounting managements, to conduct financial audits, to conduct internal operation management, to monitor, prevent, and investigate fraud, money laundering, terrorism, misconduct, or other crimes, including but not limited to carrying out the creditworthiness checks of any persons related to our corporate customer, which may not be required by any governmental or regulatory authorities, and authenticating your identity to prevent such crimes);

b) conduct our relationship managements (e.g. to serve customers, to conduct customer survey, to manage customer segmentation, to handle complaints);

c) ensure security (e.g. to maintain CCTV records, to register, exchange identification card and/or take photo of visitors before entering into our building areas;

d) develop and improve our products, services and systems to enhance our services standard and/or for the greatest benefits in fulfilling your needs, including to conduct research, analyze data and offer products, services and benefits suitable to you by considering the fundamental rights in your personal data. If you do not wish to receive the offering of products, services and benefits from us, you can contact us via contact@guildfi.com.

e) record images and/or voices relating to the meetings, trainings, seminars, recreations or marketing activities;

f) in case of our corporate customer, we will collect, use and disclose personal data of directors, authorized persons or attorneys;

- g) ensure business continuity;
- h) handle claims and disputes, file lawsuits and process the relevant legal proceedings;
- i) contact you prior to your entering into a contract with us;
- j) evaluate suitability and/or qualifications of our platform users;
- k) protect against security risks (e.g. monitoring network activity logs, detecting security incidents, conducting data security investigations, and otherwise protecting against malicious, deceptive, fraudulent, or illegal activity);
- l) comply with applicable foreign laws;
- m) carry out research, plan and conduct statistical analysis (e.g. data analytics, assessments, surveys and reports on our products and/or services and your behavior);
- n) organize our promotional campaigns or events, conferences, seminars, and company visits;
- o) facilitate financial audits to be performed by auditors;
- p) receive advisory services from legal counsels, financial advisors, and/or other advisors appointed by you or us;
- q) in the event of sale, transfer, merger, reorganization, or similar event, disclose and transfer your personal data to one or more third parties as part of that transaction;
- r) maintain and update lists or directories of the customers (including your personal data) and keep contracts and associated documents in which you may be referred to; and/or
- s) comply with reasonable business requirements (e.g. management, training, auditing, reporting, control or risk management, statistical and trend analysis and planning or other related or similar activities, implementing business controls to enable our business to operate, and enabling us to identify and resolve issues in our IT systems to keep our systems secured, performing our IT systems development, implementation, operation and maintenance).

4. Your consent: in certain cases, we may ask for your consent to collect, use or disclose your personal data to maximize your benefits and/or to enable us to provide services to fulfill your needs for the following purposes, which include but not limited to:

a) collect, use or disclose your sensitive personal data as necessary;

b) collect and use your personal data and any other data to conduct research and analyze for the greatest benefits in developing products and services to truly fulfill your needs and/or to contact you for offering products, services and benefits exclusively suitable to you;

c) contact you to provide advice and offer our products or services which may interest you (in case the consent is required under the PDPA);

d) disclose your personal data and any other data to our group companies and our trusted business partners for the following purposes: (1) researching, conducting statistical data, developing, analyzing products, services, and benefits to fulfill your needs; and (2) contacting you for offering or providing products, services and benefits suitable to you;

e) send or transfer your personal data and sensitive personal data overseas, which may have inadequate personal data protection standards (unless the PDPA specifies that we may proceed under other lawful basis or without obtaining consent);

f) other activities which we may require your consent.

5. Other lawful basis: apart from the lawful basis which we mentioned earlier, we may collect, use or disclose your personal data based on the following lawful basis:

a) prepare historical documents or archives for the public interest, or for purposes relating to research or statistics;

b) prevent or suppress a danger to a person's life, body or health; and/or

c) necessary to carry out a public task, or for exercising official authority.

If the personal data we collect from you is required to meet our legal obligations or to enter into an agreement with you, we may not be able to provide (or continue to provide) some or all of our products and services to you if you do not provide such personal data when requested.

○ **Sources of your personal data**

Normally, we will collect your personal data directly from you, but sometimes we may get it from other sources, in such case we will ensure the compliance with the PDPA.

Personal data we collect from other sources may include but not limited to:

a) Data obtained by us from our group companies, business partners, and/or any other persons who we have relationship with;

b) Data obtained by us from persons related to you (e.g. your family, friends, referees);

c) Data obtained by us from corporate customers as you are director, authorized person, attorney, representative or contact person;

d) Data obtained by us from governmental authorities, regulatory authorities, financial institutions, credit bureau and/or third-party service providers (e.g. data that is publicly available, data that relates to transactions, credit data); and/or

In case you have given any personal data of any other person to us for executing transactions with us or any purposes, you shall notify such person of the details relating to the collection, use and disclosure of personal data and rights under this privacy notice. In addition, you shall obtain consent from such person (if necessary) or relied on another legal basis to provide personal data to us.

○ **With whom we share your personal data**

We may disclose your personal data to the following parties under the provisions of the PDPA:

a) our group companies, business partners and/or other persons that we have the legal relationship, including our directors, executives, employees, staffs, contractors, representatives,

advisors and/or such persons' directors, executives, employees, staffs, contractors, representatives, advisors;

b) governmental authorities and/or supervisory or regulatory authorities

c) suppliers, agents and other entities (e.g. professional associations to which we are member, external auditors, depositories, document warehouses, overseas financial institutions, clearing houses) where the disclosure of your personal data has a specific purpose and under lawful basis, as well as appropriate security measures;

d) any relevant persons as a result of activities relating to selling rights of claims and/or assets, restructuring or acquisition of any of our entities, where we may transfer their rights to; any persons with whom we are required to share data for a proposed sale, reorganisation, transfer, financial arrangement, asset disposal or other transaction relating to our business and/or assets held by our business;

e) financial institutions and third parties where required by law to help recover funds that have entered your account due to misdirected payment(s) by such third parties or trace funds where you are a victim of suspected financial crime, or where suspect funds have entered your account as a result of financial crime;

f) debt collection agencies, lawyers, credit bureau, fraud prevention agencies, courts, authorities or any persons whom we are required or permitted by laws, regulations, or orders to share personal data;

g) third parties providing services to us (e.g. IT service providers, market analysis and benchmarking service providers, cloud computing service providers, including but not limited to correspondent, overseas remittance system service providers and switching system service providers, agents and subcontractors acting on our behalf, the companies which print and deliver credit card statements);

h) social media service providers (in a secure format) or other third-party advertisers so they can display relevant messages to you and others on our behalf about our products and/or services. Third-party advertisers may also use data relating to your previous online activities to tailor adverts to you;

i) third-party security providers;

j) other persons that provide you with benefits or services associated with our products or services; and/or

k) your attorney, sub-attorney, authorized persons or legal representatives who have lawfully authorized power.

- **International transfer of personal data**

The nature of our business operation is global and under certain circumstances it is necessary for us to send or transfer your personal data internationally (e.g. transferring data to companies to cloud server overseas for the purpose of the provision of services). When sending or transferring your personal data, we will always exercise our best effort to have your personal data transferred to our reliable business partners, service providers or other recipients by the safest method in order to maintain and protect the security of your personal data.

If the destination countries do not have adequate data protection standard, we will proceed to transfer personal data as specified by the PDPA and will put in place the protection measures of such personal data as necessary and appropriate.

- **Retention period of personal data**

We will maintain and keep your personal data while you are our customer and once you has ended the relationship with us (e.g. after you closed your account with us, or following a transaction with us, or in case of your application to use our services is disapproved, or you terminated the services provided by us), we will only keep your personal data for a period of time that is appropriate and necessary for each type of personal data and for the purposes as specified by the PDPA.

The period we keep your personal data will be linked to the prescription period or the period under the relevant laws and regulations (e.g. Financial Institutions Businesses Laws, Securities and Exchange Laws, Anti-Money Laundering Laws, Counter-Terrorism and Proliferation of Weapon of Mass Destruction Financing Laws, Accounting Laws, Tax Laws, Labour Laws and other laws). In addition, we may need to retain records of CCTV surveillance in our head office, our branches to prevent fraud and to ensure security, including investigating suspicious transactions which you or related persons may inform us.

- **Use of Cookies**

We may collect and use cookies and similar technologies when you use our products and/or services. This includes when you use our websites.

The collection of such cookies and similar technologies helps us recognise you, remember your preferences and customise how we provide our products and/or services to you. We may use

cookies for a number of purposes (e.g. enabling and operating basic functions, helping us understand how you interact with our websites or emails, or enabling us to improve your online experiences or our communications with you, particularly, to ensure that online adverts displayed to you will be more relevant to you and of your interests).

- **Security**

We endeavor to ensure the security of your personal data through our internal security measures and strict policy enforcement. The measures extend from data encryption to firewalls. We also require our staff and third-party contractors to follow our applicable privacy standards and policies and to exercise due care and measures when using, sending or transferring your personal data.

- **The rights you can exercise in respect of the processing of your personal data**

You Can exercise the following rights in respect to your personal data:

1. Access and obtain copy: you have the right to access and obtain copy of your personal data holding by us, unless we are entitled to reject your request under the laws or court orders, or if such request will adversely affect the rights and freedoms of other individuals.
2. Rectify: you have the right to rectify your inaccurate personal data and to update your incomplete personal data.
3. Erase: you have the right to request us to delete, destroy or anonymize your personal data, unless there are certain circumstances where we have the legal grounds to reject your request.
4. Restrict: you have the right to request us to restrict the use of your personal data under certain circumstances (e.g. when we are pending examination process in accordance with your request to rectify your personal data or to object the collection, use or disclosure of your personal data, or you request to restrict the use of personal data instead of the deletion or destruction of personal data which is no longer necessary as you have necessity to retain it for the purposes of establishment, compliance, exercise or defense of legal claims).
5. Object: you have the right to object the collection, use or disclosure of your personal data in case we proceed with legitimate interests basis or for the purpose of direct marketing, or for the purpose of scientific, historical or statistic research, unless we have legitimate grounds to reject your request (e.g. we have compelling legitimate ground to collect, use or disclose your personal data, or the collection, use or

disclosure of your personal data is carried out for the establishment, compliance, or exercise legal claims, or for the reason of our public interests).

6. Portability: you have the right to receive your personal data in case we can arrange such personal data to be in the format which is readable or commonly used by ways of automatic tools or equipment, and can be used or disclosed by automated means. Also, you have the right to request us to send or transfer your personal data to third party, or to receive your personal data which we sent or transferred to third party, unless it is impossible to do so because of the technical circumstances, or we are entitled to legally reject your request.
7. Withdraw consent: you have the right to withdraw your consent that has been given to us at any time pursuant to the methods and means prescribed by us, unless the nature of consent does not allow such withdrawal. The withdrawal of consent will not affect the lawfulness of the collection, use, or disclosure of your personal data based on your consent before it was withdrawn.
8. lodge a complaint: you have the right to make a complaint with the Personal Data Protection Committee or their office in the event that we do not comply with the PDPA.

- **Contact us**

If you have any questions or would like more details about our privacy policy or would like to exercise your rights, please contact us through the following channels:

- for general contact, please reach out to contact@guildfi.com.
- for our Data Protection Officer, please reach out to dpo@guildfi.com.

- **Changes to this privacy policy**

We may change or update this privacy policy from time to time and we will inform the updated privacy policy at our website <https://guildfi.com/>