

## DIGITAL TREASURES CENTER PRIVACY POLICY

Effective Date: 27.05.2020

### 1. ABOUT THIS POLICY

- 1.1. This is the Privacy Policy for **Digital Treasures Center Pte. Ltd.** (a company incorporated in Singapore, and operating at 7 Straits View #05-01 Marina One East Tower Singapore 018936) any fund or trust managed by us or any of our related corporations or affiliates (“**Related Parties**”)(Digital Treasures Center Pte. Ltd. and its Related Parties shall be collectively, “**DTC**”). In this Privacy Policy, “we”, “us” or “our” refers to DTC. Where this Privacy Policy is in common use by separate organisations within DTC, each organisation is responsible to you only to the extent of their own collection and use of your personal data, and their own actions.
- 1.2. This Privacy Policy describes how we may collect, use, disclose and process your personal data when you:
  - 1.2.1. access or use our websites and applications (including mobile and web-based applications) (collectively, “**Applications**”), and services, and/or
  - 1.2.2. provide us with your personal data.
- 1.3. By providing us with personal data, you agree to the terms of this Privacy Policy and you consent to our collection, use, disclosure and processing of personal data on these terms. DO NOT provide any personal data to us if you do not accept this Privacy Policy.
- 1.4. This Privacy Policy supplements but does not supersede or replace any other consents you may have provided to us, or any other agreements or arrangements that you may have with us, in respect of your personal data.
- 1.5. Our Applications may contain links to other websites that are not owned or maintained by us. These links are provided only for your convenience. This Privacy Policy only applies to our Applications. When visiting these third party websites, their privacy policies apply.
- 1.6. If you have any feedback or issues in relation to your personal data, or about this Privacy Policy, or wish to make a complaint to us, you may contact our Data Protection Officer at :

Email : [privacy.policy@dtc.top](mailto:privacy.policy@dtc.top)

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.

### 2. AMENDMENTS TO THIS PRIVACY POLICY

- 2.1. We may amend this Privacy Policy from time to time without notice to you, in compliance with applicable laws or as we update our data usage and handling processes. This updated policy will supersede earlier versions and will apply to personal data provided to us previously.

### 3. WHAT PERSONAL DATA WE COLLECT

- 3.1. **What is personal data.** “Personal data” is data that can be used to identify a natural person. Examples of personal data include name, address, date of birth, contact details, identification numbers and any other information of a personal nature.
- 3.2. **Voluntary provision of personal data.** We collect personal data that you voluntarily provide to us. What personal data we collect depends on the purposes for which the personal data is collected and what you have chosen to provide.

You can choose not to provide us with personal data. You also have the right to withdraw your consent for us to continue collecting, using, disclosing and processing your personal data, by contacting us in accordance with paragraph 1.6. However, if you do so, it may not be possible for us to fulfil the purposes for which we require the personal data, including processing your transactions or providing you with the products and services that you require or setting any account on DTC platform and services.

- 3.3. **Providing personal data belonging to others.** In certain circumstances, you may also provide us with personal data of persons other than yourself. If you do so, you warrant that you have informed him/her of the purposes for which we are collecting his/her personal data and that he/she has consented to your disclosure of his/her personal data to us for those purposes and accepts this Privacy Policy. You agree to indemnify and hold us harmless from and against any and all claims by such individuals relating to our collection, use and disclosure of such personal data in accordance with the terms of this Privacy Policy.
- 3.4. **Accuracy and completeness of personal data.** You are responsible for ensuring that all personal data that you provide to us is true, accurate and complete. You are responsible for informing us of any changes to your personal data.
- 3.5. **Minors.** Our Applications and services are not intended for minors and we do not knowingly collect personal data from any person under the age of 18. If you are a parent or guardian of a minor and you have reason to believe your child or ward has provided us with their personal data without your prior consent, please contact us to request for erasure of their personal data.

#### 4. HOW WE COLLECT PERSONAL DATA

- 4.1. **Personal data you provide.** We collect personal data that is relevant to our relationship with you. We may collect your personal data directly or indirectly through various channels, such as when:
  - 4.1.1. you register an account with us through our Applications;
  - 4.1.2. download or use our Applications and services;
  - 4.1.3. you transact with us, contact us or request that we contact you through various communication channels, for example, through social media platforms, messenger platforms, face-to-face meetings, telephone calls, emails, fax and letters;
  - 4.1.4. when you attend events or functions organised by us;
  - 4.1.5. we seek information about you and receive your personal data in connection with your relationship with us;
  - 4.1.6. you submit an application for employment, internship or secondment, or when you provide documents or information including your resume in connection with any application; and/or
  - 4.1.7. when you submit your personal data to us for any other reason.
- 4.2. **Personal data provided by others.** Depending on your relationship with us, we may also collect your personal data from third party sources, for example:
  - 4.2.1. from our business partners such as third parties providing advertising, marketing and promotional services to us;
  - 4.2.2. from your referees, educational institutions or previous employers (if you have applied to us for a job);

- 4.2.3. from your family members or friends who provide your personal data to us on your behalf; and/or
  - 4.2.4. from public agencies or other public sources.
- 4.3. **Automated Data Collection Technologies.** Our Applications may contain certain technologies that collect data in the manner described in this Privacy Policy (see below). You should not use our Applications if you do not agree to having your data collected through such means. Alternatively, you should disable these technologies where it is possible to do so.
- 4.3.1. **Cookies (or browser cookies).** Cookies are small text files which are set by a website or application operator so that your browser or device may be recognised. We may make use of cookies on our Applications to store and track information such as the number of users and their frequency of use, profiles of users and their online preferences. Cookies do not capture information which would personally identify you, but the information collected may be used to assist us in analysing the usage of our Applications and to improve your online experience with us. You can disable the cookies by changing the setting on your browser. However, this may affect the functionality of the Applications.
  - 4.3.2. **Flash cookies.** Certain features of our Applications may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Applications. In contrast to normal cookies, these cookies are not created and saved by the web browser but are governed by the Adobe Flash plug-in. These can contain more information than normal cookies and cannot be deleted or disabled via the browser; this is only possible using tools such as the Adobe Flash Player website. You can also obtain more information about these cookies on their website.
  - 4.3.3. **Third Party Use of Cookies and other Tracking Technologies.** Some content or applications on the Applications, including advertisements, are served by third parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Applications. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content. We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.
  - 4.3.4. **Web Tracking Beacons and tracking links.** Web beacons (also known as pixel tags and clean GIFs) involve graphics that are not apparent to the user. Tracking links and/or similar technologies consist of a few lines of programming code and can be embedded in our website or our (mobile) applications. In conjunction with cookies, these are primarily used for statistical analysis purposes. This technology can also be used for tracking traffic patterns on websites, as well as finding out if an e-mail has been received and opened and to see if there has been any response.
  - 4.3.5. **Google Analytics.** Web analytics is the term given to a method for collecting and assessing the behaviour of visitors to websites and mobile applications. This includes the analysis of traffic patterns in order, for example, to determine the frequency of visits to certain parts of a website or mobile application, or to find out what information and services our visitors are most interested in. The web analytics services on our Applications are provided by Google Analytics. If you do not allow Google Analytics to collect and assess information about your behaviour at our Applications, you can install the Google Analytics opt-out browser add-on.

## 5. PURPOSES FOR COLLECTION, USE OR DISCLOSURE OF YOUR PERSONAL DATA

- 5.1. **General purposes.** Generally, we collect, use, disclose and process your personal data for purposes connected or relevant to our business, to manage your relationship with us. Such purposes would include:
- 5.1.1. carrying out your transactions with us, taking steps as may be directed by you, or to provide products and/or services to you;
  - 5.1.2. facilitating your use of our Applications, including verifying and establishing your identity, and authenticating, operating and maintaining user accounts;
  - 5.1.3. processing payment or credit transactions;
  - 5.1.4. compliance with any applicable laws, regulations, codes of practices, guidelines, or rules (e.g. Know-Your-Client checks, anti-money laundering and countering the financing of terrorism), or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - 5.1.5. performing or carrying out of our functions as the approved holder of digital tokens, including issuing, administering, processing claims for and providing refunds in respect of such tokens;
  - 5.1.6. administrative purposes, including finance, IT and HR purposes, quality assurance and staff training, and compliance with internal policies and procedures, including audit, accounting, risk management and record keeping;
  - 5.1.7. carrying out research and statistical analysis, including development of new products and services or evaluation and improvement of our existing products and services;
  - 5.1.8. resolving any disputes, investigating any complaint, claim or dispute or any actual or suspected illegal or unlawful conduct;
  - 5.1.9. responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
  - 5.1.10. enforcing legal obligations owed to us, or responding to complaints, litigation or investigations concerning us;
  - 5.1.11. facilitating business asset transactions;
  - 5.1.12. such purposes that may be informed to you when your personal data is collected; and/or
  - 5.1.13. any other reasonable purposes related to the aforesaid.
- 5.2. **Additional purposes.** We will only collect, use, disclose and process your personal data for the above purposes and purposes for which you have consented. In certain situations, we may use your personal data for legitimate purposes, which are not incompatible with the original purposes for which you have provided the personal data. If we wish to use your personal data for a purpose unrelated to what you have provided your personal data to us for, we will notify you and seek your consent.
- 5.3. **Legitimate purposes.** We may collect, use, disclose and process your personal data for legitimate purposes related to our business. For example,
- 5.3.1. Usage of the Applications: When you use the Applications, we may collect, use or disclose your personal data to (a) third parties who provide products and/or services that you seek; (b) send you communications and satisfaction surveys; (c) invite you to

subscribe to our mailing lists and/or promotional activities; and (d) evaluate your preferences to improve and customise your experience on the Applications.

- 5.3.2. Job seeker/employee: If you are a job seeker, in addition to the specific position which you have applied for, we may disclose your personal data to our related companies for the purposes of offering additional employment opportunities.
- 5.3.3. Investor/shareholder: If you are an investor or shareholder of DTC, we may use your personal data to (a) send you information about DTC (b) manage investor / shareholder relations; and (c) comply with regulatory requirements.
- 5.3.4. Managing our business: We may disclose your personal data to third parties who provide services to us, including our service providers and data processors (providing services such as hosting and maintenance services, analysis services, e-mail messaging services, delivery services, handling of payment transactions, marketing, human resources, and professional services) and our consultants and professional advisors (such as accountants, lawyers, auditors).
- 5.4. **Use permitted under applicable laws.** We may also collect, use, disclose and process your personal data for other purposes, without your knowledge or consent, where this is required or permitted by law.
- 5.5. **Marketing purposes.** If you have provided us with your consent, we may use your personal data for the purposes of marketing our products and services and those of our strategic partners and business associates (e.g. informing you of our latest activities, special offers and promotions). In order for us to market products and services which are of special interest and relevance to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us).
- 5.6. **Contacting you.** When we contact or send you information for the above purposes and purposes for which you have consented, we may do so by post, e-mail, SMS, telephone or such other means provided by you. We will not contact you for marketing purposes unless you have provided us with your consent, or unless we are exempted by applicable law from having to obtain your consent. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with paragraph 1.6 above.

## 6. DISCLOSURE OF PERSONAL DATA

- 6.1. We may disclose or share your personal data with our related parties or business partners in connection with the above stipulated purposes. We may also disclose or share your personal data:
  - 6.1.1. where such disclosure is required for performing obligations in the course of or in connection with our provision of goods and/or services as may be requested or directed by you;
  - 6.1.2. with third parties in order to provide such third parties' products and/or services as may be requested or directed by you;
  - 6.1.3. third parties who provide necessary services to us (such as our service providers providing services such as hosting and maintenance services, data analytics, messaging, marketing, and other professional services (including accountants, lawyers and auditors)); and
  - 6.1.4. to any of the following in connection with the above stipulated purposes and/or such other purpose as may be permitted under applicable laws:
    - 6.1.4.1. our related parties, and respective employees, agents, auditors, contractors, service providers and professional advisers;

6.1.4.2. any liquidator, a provisional liquidator, an administrator, a receiver, receiver and manager or judicial manager over us or any of our assets; and/or

6.1.4.3. any regulatory, supervisory, governmental or quasi-governmental or other authority, court of law, tribunal or person, whether in Singapore or any other jurisdiction.

## 7. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

7.1. **Transfers.** You fully understand and unambiguously consent that we may transfer your personal data to any country (including to third parties where necessary) for the purposes set out in this Policy or as notified to you.

7.2. **Safeguards.** Where we transfer your personal data outside of Singapore, we will require foreign recipients of the personal data to protect your personal data in accordance with this policy and applicable data protection laws.

## 8. SECURITY AND RETENTION OF PERSONAL DATA

8.1. **Unauthorised access.** While precautions will be taken to ensure that the personal data you provide is protected against unauthorised or unintended access, we cannot be held responsible for unauthorised or unintended access that is beyond our control.

8.2. **Vulnerabilities.** We do not guarantee that our systems or applications are invulnerable to security breaches, nor do we make any warranty, guarantee, or representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses, and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.

8.3. **Period of retention.** We keep your personal data only for so long as we need the personal data to fulfil the purposes we collected it for, and to satisfy our business and/or legal purposes, including audit, accounting or reporting requirements. How long we keep your personal data depends on the nature of the data, for example:

8.3.1. we will keep personal data for at least the duration of the limitation period for bringing claims if the personal data may be required to commence or defend legal proceedings; and

8.3.2. personal data collected for use for a limited purpose will generally not be retained for more than one (1) year after completion of the purpose.

Some information may be retained for longer, for example where we are required to do so by law, or need to retain it for the purposes of litigation.

8.4. **Anonymised data.** In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

## 9. YOUR RIGHTS

9.1. Depending on the jurisdiction in which you are resident, you may enjoy certain rights at law in relation to our collection, use, disclosure and processing of your personal data. Such rights may include:

9.1.1. **Access:** you may ask us if we hold your personal data and, if we are, you can request access to your personal data. This enables you to receive a copy of and information on the personal data we hold about you.

- 9.1.2. **Correction:** you may request that any incomplete or inaccurate personal data we hold about you is corrected.
- 9.1.3. **Erasure:** you may ask us to delete or remove personal data that we hold about you in certain circumstances.
- 9.1.4. **Restriction:** you may withdraw consent for our use of your personal data, or ask us to suspend the processing of certain of your personal data about you, for example if you want us to establish its accuracy.
- 9.1.5. **Portability:** you may request the transfer of certain of your personal data to another party under certain conditions.
- 9.1.6. **Objection:** where we are processing your personal data based on a legitimate interest (or those of a third party) you may object to processing on this ground.

If you wish to exercise any of your rights, you may contact us in accordance with paragraph 1.6. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law, we may also charge you a fee to process your request.

- 9.2. **Limitations.** We may be permitted under applicable laws to refuse a request, for example, we may refuse (a) a request for erasure where the personal data is required for in connection with claims; or (b) an objection request and continue processing your personal data based on compelling legitimate grounds for the processing.