

# Privacy Policy - Qoin Singapore

## 1. About this Policy

**Bartercard International Singapore PTE. LTD. [Registration number 200 508 815K] ("Qoin SG")** respects your privacy. This Privacy Policy describes the information we collect, and the manner in which we may use such information. The Q Wallet or any other applications or software (collectively the "**App**") is used by Qoin SG to give you access to the Qoin ecosystem and to allow you to purchase goods and services using Qoin, and to trade Qoin on participating digital currency exchanges.

Access to the App and Qoin is conditional on you accepting the terms of this Privacy Policy. The Privacy Policy applies to the collection, storage, use and disclosure by Qoin SG of the personal information of the individuals using the App and Qoin.

By accessing and using the App, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.

In this Policy personal data means any information related to you as an identified or identifiable natural person, a person can be identified through a name, an online identifier or to one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

In this Policy processing means any operation or set of operations which is performed on personal data or sets of personal data, whether or not by automated means such as collection, recording, organisation, structuring, storage, adaption or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available alignment or combination, restriction, erasure or destruction.

The personal information we hold about you must be:

- used lawfully, fairly and in a transparent way;
- collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- relevant to the purposes we have told you about and limited only to those purposes
- accurate and kept up to date;
- kept only as long as necessary for the purposes we have told you about; and
- kept securely.

If you have any further questions or if you wish to receive more information on our information practices and Privacy Policy, please contact our Privacy Officer at the details shown below.

## 2. Your rights

You have certain rights as a data subject. In relation to personal data about you, you have the right:

- To be informed about how and why we collect and use the data.
- To be given access to the data we hold.
- To have any inaccurate or incomplete data rectified.
- To ask us to delete personal data earlier than we might already dispose of it.
- To prevent us from processing the data further.
- To object to us using the data for particular purpose.

We provide the contact details at the end of this Policy for you to use if you have any complaint about our processing of your personal data.

### What data do we collect?

**Information you give us:** When you fill out any registration forms on our App, we will ask you to provide certain information about yourself. We also collect information when you:

- report any problem to us;
- use certain features on our App;
- request any support from us;
- complete any Know Your Customer Information (“KYC”);
- complete any survey or questionnaire we send to you, this information may include your name, mailing address, e-mail address, or phone number.

**Information we collect about you:** This includes information automatically collected when you visit or access the App. For example:

- technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet and your log-in information, browser type and version, time zone setting, browser plug-in and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URLs), clickstream to, through and from any of our websites (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information which include scrolling, clicks and mouse-overs, methods used to browse away from the page any phone number used to call us;
- personal identification information such as full name, date of birth, nationality, gender, signature, utility bills, photographs, phone number, home address, and/or email.

We will not collect any sensitive information about you which is not reasonably necessary for us to carry out our functions or activities for example, information that may reveal your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships or details of health or disability. Exceptions to this include:

- where you have given express consent to us to do so and the personal information is reasonably necessary for us to carry out our functions or activities; and
- the use of the information is required by law or legal process.

### **How is your data used?**

We will process and store your data securely, and we will only keep it for as long as we need it for the purpose(s) for which it is collected.

In relation to the data we do collect, as laid out in the section above, we may use it as follows:

- Providing and enhancing our products and services.
- Compliance.
- Security, Safety and issue resolution.
- Business Operations.
- Communication, Marketing and Advertising.

You have the right to withdraw your consent to our use of your personal data at any time, and to request that we delete it.

We will not share your personal data with anyone at any time.

### **How and where do we store your data?**

We will only keep your data as long as we need it for the purpose(s) for which it is collected, and/or for as long as we have your permission to hold it.

Your data will only be stored within a secure cloud environment.

### **Accessing your data**

You are entitled to make a request to obtain your data. This means that you may request a copy of any personal data we hold about you, free of charge. We will provide any or all information in response to your request if you contact our Privacy Officer via email at [\*\*privacy.officer@qoin.world\*\*](mailto:privacy.officer@qoin.world)

### **Contact Details**

If you have any questions about the App or this Policy, or you wish to make a request then please contact us as follows, making your request or query clear:

Privacy Officer

Email: [\*\*privacy.officer@qoin.world\*\*](mailto:privacy.officer@qoin.world)

### 3. Amending the Policy

We may change this policy from time to time, in response to changes in the law or for operational reasons. Any changes will immediately be posted on the Site and the App and you will be deemed to have accepted the amended Policy if you continue to use the App afterwards. You should therefore regularly review this Policy.

#### Information we receive from third parties

We work with third parties and we may receive information about you from them, for example, business partners, sub-contractors in technical payment and delivery services, advertising networks, analytics providers, search information providers, or credit reference agencies. We will notify you when we receive information about you from them and the purposes for which we intend to use that information.

Our Site or our communication from time to time contain links to third party websites over which we have no control. If you follow a link to any of these websites, please note that they have their own practices and policies. We encourage you to read these privacy policies or statements of these websites and understand your rights. We accept no responsibility or liability for any practices of third-party websites.

### 4. Use of information by Qoin SG

We use this information:

- To improve our marketing efforts, by analysing App usage and customise our App's content and layout.
- Deliver, improve and develop our technology.
- To research, design and launch new features or products.
- To present content and information on our App in the most effective manner for you and for the device you use.
- To provide you with alerts, updates, materials or information about our products and services or other types of information you either requested or signed up to.
- To communicate with you and respond to your questions and requests.
- We may also use this information to directly market new products and services (via e-mail and other on and off-line communications) to you. This involves sending you information about products and services by post, telephone or any form of electronic communication.

**We never share your name or contact details with third parties for marketing purposes unless we have your "opt-in" consent to share your details with a specific third party for them to send you marketing. We do use third party service providers to send out our direct marketing activities. We keep this information for the marketing of our services.**

If you do not wish to receive these communications from us, please notify us by e-mail at [support@qoin.world](mailto:support@qoin.world) to opt out.

#### Website Information

We may collect information about you and your use of our website

### **Who will see or have access to your information?**

For the purposes of providing you with access to our App and in order to deliver the services that we provide to you, we may share your personal information with third parties such as, any of our subsidiaries or related body corporates, contractors, auditors, advisers, agents, financial institutions, service providers and suppliers.

In order to deliver the services that we provide to you. We may disclose your personal information to other organisations only after ensuring that such organisations comply with Singapore Privacy Laws. Otherwise, we will not disclose personal information to any third party without first obtaining your permission, except where required or permitted by law, or permitted elsewhere in this Privacy Policy.

In the event of a security incident involving unauthorised access, use or disclosure of personal information where a third party with whom we share personal information is involved, we will seek to work cooperatively with them to protect the personal information we have shared with them.

We may disclose to third parties' aggregate anonymous statistics regarding our users, traffic analyses and other information regarding or collected through our App.

### **5. Security**

We collect and store personally identifiable information using encryption technology that encrypts the information you input before it is sent to us via the Internet. In addition, all the information we collect on the App and any of our websites is stored on our secure servers which are in a restricted access area and is password protected.

We store all other material that contains personally identifiable information on our dedicated cloud servers. These premises are kept secure at all times.

We restrict access to personal information to our employees, service providers and contractors on a strictly need to know basis and to ensure that those persons are subject to contractual confidentiality obligations.

Please note, however, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to the App. Any transmission is at your own risk.

### **6. Keeping your personal information secure**

Qoin SG's security measures are designed to assist in ensuring that your personal information is not accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been an unauthorised use or disclosure of your personal information, please let us know by contacting our Privacy Officer.

### **7. Correcting, changing and updating your information**

You may gain access to personal information that Qoin SG has collected about you and you may request to have any of your personal information corrected or updated by contacting the Privacy Officer at the details below.

### **8. Keeping your personal information accurate**

The personal information we hold about you (such as name and email address) is kept so that we may correctly identify you and provide services to you. We take all reasonable steps to ensure that personal information held by us is accurate, up-to-date, complete, relevant and not misleading. If you believe that any of your personal information is not accurate, up-to-date, complete, relevant and not misleading, please contact us (see below) and we will take all reasonable steps to correct it within a reasonable time.

## **9. Breaches of security**

Notwithstanding the reasonable steps taken to keep information secure, breaches may occur. In the event of a security incident we have in place procedures to promptly investigate the incident and determine if there has been a data breach involving personal information, and if so, to assess if it is a breach that would require notification. If it is, we will notify affected parties in accordance with Singapore's Privacy Law requirements.

## **10. How you can access, change or delete personally identifiable information**

You have a right to request a copy of the personal information we hold about you, except where the law allows us to refuse your request. If you wish to receive a copy of this information, please address your request to the Privacy Officer. We will deal with your request promptly and in any case at least within 30 days of the date of receiving it. We will give access to the information in the manner you request, where reasonable and practicable. This will be subject to any exemptions allowed under Singapore's Privacy Laws. We will correct or delete inaccurate or incomplete personal information we hold about you at your request, except where the law allows us to refuse your request.

## **11. Contacting Qoin SG about Privacy matters**

When contacting us you have the option to either not identify yourself or to use a pseudonym, unless it is impracticable for us to communicate with you that way or we are required or authorised under Singapore Privacy Law to only deal with individuals who have identified themselves.

## **12. Privacy Officer Details and Feedback**

We appreciate your comments and questions regarding this Privacy Policy. If at any time you believe we have handled your information otherwise than in accordance with this Privacy Policy or Singapore Privacy Law please notify the Privacy Officer using the contact details provided above and we will use commercially reasonable efforts to investigate and, if we deem reasonably appropriate, remedy the matter.

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