

PRIVACY POLICY

1. Introduction

At *FINZTRADE* owned by **INVINITY SOLUTIONS SDN. BHD.** (“**the Company**”, “**we**”, “**us**” or “**our**”) we take your privacy and the security of your information very seriously.

This Privacy Policy (“**Policy**”) covers the electronic platform – the FinzTrade web designed by the Company (“**the Platform**”).

This Privacy Policy is available at www.finztrade.com and governs your access to the Services. Unless otherwise defined herein, capitalized terms shall have the meaning assigned to such terms in the Terms and Conditions. This Privacy Policy is written in the English and Malay languages. In the event of any inconsistency or conflict between the English and Malay versions, the English version shall prevail.

If you have any questions regarding this Policy please contact us at customer@finztrade.com.

The Policy describes the types of information we gather from all users of the Platform including but not limited to business partner (individual or corporate) including business partners’ agents (“**the Users**” or “**you**”) interacting with the Services, and how we use, transfer, and secure such information. By using any of the Services, you agree to be bound by this Policy. This Policy does not govern information we receive from third parties who are not the Users. If you do not agree to the terms of this Policy, please do not use any of our Services. Each time you use our Services, the current version of this Policy will apply. Accordingly, when you use any of our Services, you should check the date of this Policy (which appears at the top) and review any changes since you last reviewed the Policy.

2. Terms

For the purposes of this Privacy Policy, the terms have the following meaning:

- ‘consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- ‘personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one

or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- 'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- 'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;
- 'recipient' means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing;
- 'third party' means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

3. Types of Data We Collect

We may collect two types of data from users of our Services: "Data provided by you" which is information used in order to create an account and "Additional data we receive about you" which is data that is generated from using our Platform, which data we store and process.

- **Data provided by you:**

We collect data you voluntarily provide to us in order to register an account at the Platform.

In general, you provide us with your name and email address in order to create an account as our business partner and provide you with the necessary access. Your email is used for account recovery purposes as well as for contacting

support. Your username is your name. This processing of personal data is solely connected to the proper execution of the legal requirements in the Personal Data Protection Act 2010.

- **Additional data we receive about you:**

Additional data may be collected when you use our Services independent of any information you voluntarily enter.

- **Log information:**

When you use our Services, some data is automatically collected. Such data could include your computer's Internet Protocol ("IP") address (a number that provides an address for your computer), operating system, type and language, device identifier numbers, and the time and date of your use.

- **Analytics information:**

We use our own internal and third-party solutions to gather and aggregate analytical data in order to improve the performance, marketing efforts and quality of our services.

Cookies are small pieces of data that are stored on your computer. We use cookies and similar technologies to operate our services. We use session cookies, which are a specific type of cookie only stored during the active usage of our services.

Cookies help us and any authorised third parties understand which advertisements you have seen so that you do not receive the same advertisement each time you visit our Platform.

Most browsers accept cookies automatically but can be configured not to do so or to notify the user when a cookie is being sent. If you wish to disable cookies, refer to your browser help menu to learn how to disable cookies. If you disable browser cookies or flash cookies, it may interfere with the proper functioning of our Platform.

4. Impact of Non-Provision of Personal Data

Please note that in the event that sufficient Personal Data is not supplied, or is not satisfactory to us, then your application or request for any of our Services may not be accepted or acted upon or your request to browse some information on the Platform, or the use of, or subscription to, or purchase of any products and/or services offered by the Company may be denied or affected.

5. Legal basis for processing the data (Lawfulness of processing)

You shall take note that, all the activities may be monitored and recorded. Anyone using our Platform expressly consents to such monitoring and recording.

You agree and give your explicit consent to the Company so the latter can request, collect, use, administrate and operate User's personal data for the purpose of providing our services in accordance to Company's policies and Company's applicable laws and regulations. We collect, process, transfer and store personal data solely in connection to your consent and to the legitimate interest arising from the relationship between the User and us and in connection.

Processing is necessary for the performance of a contract to which you are party or in order to take steps at the request of you prior to entering into a contract;

Processing is necessary in order to protect the vital interests of the data subject or of another natural person;

Processing is necessary for compliance with a legal obligation to which the controller is subject;

In case we intend to use your personal data for a purpose other than the initial one you have agreed to, we shall provide the data subjects with prior to the actions information and We shall not use the data without your explicit consent, regarding the new purpose.

6. Purposes for data collection

Your data is collected in order to:

- Operate and maintain the products and / or services you request including accounting, statistical and marketing analysis, information system management, system testing, maintenance and development, operational, support, customer surveys, customer relations.
- Optimize our marketing efforts.
- Send you information about new services and newsletters.
- Monitor the usage of our services and analyze emerging trends.
- With your consent, provide you with personalized ads if the service supports them.
- Protect your vital interests and those of others.

- For any other purposes that is required or permitted by any law, regulations, guidelines and / or relevant regulatory authorities

7. Your rights

You have the right to:

- Request from us access to the personal data that we hold about you in a portable format.
- Request from us correction of any collected personal data. The information may include only the subject of your personal data collection.
- Receive a copy of your personal data in electronic format.
- “The right to be forgotten”- you have the right to request the deletion of your personal data at any time where the retention of such data infringes relevant legislation.
- Receive information from Us about Our activities in connection to your personal data, including the purposes of collection and storage, the period of time for storage, the methods of collecting, the presence of automated processing.
- Receive your data and transfer them to another administrator.
- Delete your account at any time.
- Request from us to restrict processing.
- Object to processing on any compelling legitimate grounds, to the processing of personal data, where the basis for that processing is either: public interest; or legitimate interests of the controller.
- Object to processing for the purposes of direct marketing
- Lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that there is personal data breach.

8. Exercising Your Rights

To exercise your rights you can always contact us by sending mail at customer@finztrade.com to us.

For managing your account information, you can use the profile settings feature in our Platform.

9. Sharing of Personal Information with Third Parties

We may disclose your personal information to third parties for the purpose stated above. We may disclose personal information to companies and / or organisations that act as our agents, contractors, service providers and / or professional advisors. For example, we may transfer your personal information to third party service providers to communicate the third party services regarding requests you have made through the Services. These third party service providers are not authorized to retain, share, store or use the personal information for any purposes other than to provide the services they have been hired to provide. We do not sell trade or otherwise share personal information with third parties for the marketing purposes of the third party.

We may also elect to transfer your personal information to third parties such as law enforcement agencies and government agencies under special circumstances:

- (i) to comply with a legal requirement, judicial proceeding, court order, or legal process served on us or its affiliates,
- (ii) to investigate a possible crime, such as fraud or identity theft;
- (iii) in connection with the sale, purchase, merger, reorganization, liquidation or dissolution of the Company;
- (iv) when we believe it is necessary to protect the rights, property, or safety of us or other persons, or
- (v) as otherwise required or permitted by law, including any contractual obligations of us.

10. Children and Privacy

Our Services are not directed towards children, and you may not use our Platform if you are under the age of 18.

11. Time period for personal data storage

We retain your data for as long as your account is active or is needed for providing you with our services.

We may hold on to your data for extended periods of time in order to comply with laws, legal requests, governmental investigations, or investigations of possible violations of our terms and policies, or otherwise prevent harm.

12. How Do We Protect Your Information

We take the security of your personal data very seriously. We use reasonable administrative, physical, and technical safeguards to secure the personal data you share with us.

The security of your use of Platform relies on your protection of your electronic device. You may not share your instance of the electronic device with anyone. If you believe that an unauthorized access to your instance of the electronic device has occurred, please report it immediately at customer@finztrade.com. You must promptly notify us if you become aware that any information provided by or submitted to your electronic device is lost, stolen, or used without permission.

Please do not share your password with anyone. We will never ask you to send your password or other sensitive information to us in an email, though we may ask you to enter this type of information on the Platform.

Any email or other communications purporting to be from us requesting your password or asking you to provide sensitive account information via email, should be treated as unauthorized and suspicious and should be reported to us immediately by email at customer@finztrade.com. If you believe someone else has obtained access to your password, please change it immediately and report it immediately by emailing at customer@finztrade.com.

13. Modification of Policy

Each time you use our Services, the current version of the Policy will apply. When you use any of our Services, you should check of this Policy and review any changes since the last version. This Policy is accessible within our Site and App at Privacy Policy and available at customer@finztrade.com Unless stated otherwise, our current Policy applies to all information that we have about you.

14. Breach measures

In case of personal data breach, we will undertake every possible action in an appropriate and timely manner, to avoid any material or non-material damage to the data subjects. Breaches in the security may include identity theft, identity fraud, limitation of rights, un authorised access to your account, loss of confidentiality of personal data, etc. As soon as the controller becomes aware of the breach, Users and the competent authorities will be notified immediately. You may be asked to follow certain instructions for prevention of breaches including but not limited to password or username change.

15. Contact Us?

To contact us with your questions or comments regarding this Policy or the information collection and dissemination practices of us relevant to your use of the Services, please email us at customer@finztrade.com.