



FundTier's Privacy Policy

Your personal data (such as information that identifies you or can be used to identify you, for example your name, date of birth and contact details) is protected by the Singapore Personal Data Protection Act 2012 (No. 26 of 2012) of Singapore (the "**PDPA**"). This "**Privacy Policy**" explains how FundTier will collect, use and disclose your personal data (as defined in the PDPA). In the event of any conflict between this Privacy Policy (or any portion thereof) and any other data protection policy on the Platform, this Privacy Policy shall prevail.

All capitalized terms used and not defined herein shall have the respective meanings ascribed to them under the Platform Terms and its Appendices, accessible at [here](#).

By visiting our Website and using our Platform, you (a "**User**") agree to be bound by the terms of this 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.

1. HOW WE COLLECT YOUR PERSONAL DATA

1.1. From time to time, we may collect personal data from:

- a) Users, when:
 - (i) when such Users submit such data to us;
 - (ii) when such Users interact with us, whether over the telephone, via email, in person or otherwise;
 - (iii) when such Users undertake any transactions using our computer systems or network; or
 - (iv) through the use of cookies (or similar technology) when a User browses our website.
- b) third parties, including Relevant Individuals (as defined below) whom a User has instructed or authorised us to collect your personal data from; and/or
- c) publicly available sources including credit bureaus personal data about Users and related parties, including but not limited to the User's beneficial owners, partners, directors, officers, authorised signatories, employees, customers, payors, payees, guarantors, other security providers and other natural persons related to User (collectively, "**Relevant Individuals**").

1.2. The types of personal data that we collect includes:

- a) information that a User provides when registering or opening an account with us, including names, identification particulars, date of birth, contact details and other relevant personal information;
- b) details of a User's usage of our Website and/or Platform;
- c) information regarding transactions that a User effects over our Website or Platform; and
- d) other personal data that a User may provide to us from time to time.



- 1.3. Information and data may also be generated in the ordinary course of the relationship with FundTier, for example, through the use of an account on the Platform or when a Relevant Individual gives instruction in respect of the Facility Arrangement and/or Facility Agreement in connection with a User. Such personal data may include, but is not limited to, signatures, answers to questions intended for security verification, emergency contact numbers or call back contact details.
- 1.4. Personal data of a Relevant Individual may be processed, kept, transferred or disclosed in accordance with the PDPA.

2. DEEMED CONSENT

- 2.1. The User will be deemed to have consented (or obtained the consent of the Relevant Individuals) to the collection, use and disclosure of personal data of Relevant Individuals by the User's continued dealing, use of FundTier's Services and/or acceptance of the terms and conditions contained herein.

3. HOW WE USE YOUR PERSONAL DATA

- 3.1. Information and data may be used and disclosed inside or outside Singapore for the following purposes (collectively, "**Permitted Purposes**"):
 - a) to administer your account with FundTier, provide Services to you and manage our relationship with you, including but not limited to the facilitating of funding transactions and arrangements and carrying out or responding to requests, questions or instructions from Users and/or their representatives;
 - b) for legal and compliance purposes, including maintaining accurate "know-your-client" information, to verify the identities or authorities of Users and/or their representatives who contact FundTier or may be contacted by FundTier;
 - c) to comply with this Privacy Policy and any other terms and conditions as may be stipulated by FundTier from time to time and at any time;
 - d) to send you notices, communications, statements of account and invoices;
 - e) to personalise our services to you;
 - f) to carry out, monitor and analyse our business;
 - g) to send you marketing material that you have agreed to receive, including but not limited to newsletters sent by us via email, information sent by us about FundTier's products and Services, including updates on our latest promotions and new products and Services, via email, text message or phone call;
 - h) as part of any sales, merges, or similar change of FundTier's business;
 - i) to comply with any applicable laws, rules, or regulations in any country;
 - j) to detect, prevent and investigate fraud;
 - k) facilitate any other purposes reasonably related or ancillary to the above purposes; and
 - l) facilitate any other purposes for which your specific consent was obtained or given.



4. PARTIES TO WHOM PERSONAL DATA MAY BE DISCLOSED

- 4.1. Personal data may be disclosed to the following entities (inside or outside Singapore) for the Permitted Purposes or any other purposes arising out of or in connection with any Permitted Purposes on a need to know basis:
- a) any agent, contractor, or third party services provider who provides banking, remittance, administrative, mailing, telecommunications, call centres, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference checks or securities clearing or other services to FundTier in connection with the business operations of FundTier;
 - b) any person or entity working for us or is a part of FundTier's group companies and is under a duty of confidentiality to the disclosing FundTier entity although only to the extent necessary to fulfil the relevant Permitted Purposes;
 - c) any person or entity to whom FundTier is under an obligation or otherwise required to make disclosure pursuant to any applicable laws, including disclosure to courts, tribunals, and/or legal, regulatory, tax and government authorities;
 - d) any actual or proposed assignee of FundTier or transferee of FundTier's rights in respect of the User, or all or any part of the assets or business of FundTier;
 - e) any party giving or proposing to give a guarantee or third-party security to guarantee or secure the obligations of the User; and
 - f) any credit bureau (including without limitation Credit Bureau (Singapore) Pte Ltd) as well as the members of such credit bureau.

5. HOW LONG WE WILL KEEP YOUR PERSONAL DATA

- 5.1. We will keep your personal data for no longer than is necessary for the Permitted Purposes described in this Privacy Policy or to meet legal and regulatory requirements.

6. YOUR RIGHTS IN RESPECT OF YOUR PERSONAL DATA

- 6.1. You have certain rights under the PDPA, including the right to access, update or correct the personal data we hold about you or withdraw your consent to the use, collection and disclosure of your personal data (subject to certain exceptions).
- 6.2. To request access to your personal data, please email support@FundTier.com. We may make a small charge for this service.
- 6.3. If you have any questions about this Privacy Policy, or if you wish to access, update or correct your personal data or withdraw your consent to the use, collection and disclosure of your personal data in accordance with this Privacy Policy, please email support@FundTier.com.