

## Privacy Policy

### Your Privacy Is Important to Us

We are committed to safeguarding your privacy and ensuring that your personal data is protected. We therefore make sure that our policies and practices in relation to personal data comply with all the relevant applicable requirement

### Privacy Policy

1. This Privacy Policy ("Policy") describes how Dattel Pte. Ltd. Dattel Sdn Bhd, PT Dattel Mitra Asia, and Dattel Co. Ltd., (collectively as "we", "us" or "our") collects, uses and protects your Personal Data.
2. We are private limited companies incorporated in:
  - Singapore, registered as Dattel Pte. Ltd. With a business address at 30 Cecil Street, #19-08 Prudential Tower, 049712 Singapore.
  - Malaysia, registered as Dattel Sdn Bhd with a business address at 5-9-5, Block 5, VSQ@PJ City Centre, Jalan Utara, 46200 Petaling Jaya, Selangor, Malaysia.
  - Indonesia, registered as PT Dattel Mitra Asia with a business address at HDI Hive Menteng, 5th Floor, Unit A-B, Jl. Probolinggo No.18, Menteng, Jakarta 10350 Indonesia.
  - Thailand, registered as Dattel Co. Ltd. with a business address at 191/13, CTI Tower, Level 29, Ratchadaphisek Road, Khwaeng Khlong Toei, Khet Khlong Toei, 10110 Bangkok, Thailand.
3. This Policy applies to <https://www.dattel.asia> ("the Site") and to any organized projects and/or programs ("Projects") and to any platform ("Platform") operated by us and/or our subsidiaries and/or our affiliates where your personal data is collected by us. Any defined terms in the Terms of Use ("Terms & Conditions") shall carry the same meaning in this Policy.
4. By using the Site and/or involved in the Projects and/or using any linked or created Platform by us, you are agreeing to the terms of this Policy.
5. Please note that this Policy may be amended from time to time by posting the updated version here on the Site. You are advised to check it on a regular basis.

### How We Collect Your Personal Data

1. When you visit the Site, we will record your visit only and will not collect any personally identifiable information (i.e. information that is about you and identifies you) from you unless otherwise stated. The provision of your Personal Data is voluntary. We use cookies and similar technologies to collect data about your use of the Site. For your information, Cookies are small computer files that can be stored on your computer for the purposes of obtaining configuration information and analysing your browsing habits. They can save you from registering again when re-visiting a web site and are commonly used to track your preferences in relation to the subject matter of the website. You may refuse to accept Cookies (by modifying the relevant Internet options or browsing preferences of your computer system), but if you do so you may not be able to utilize or activate certain available functions on our Site.

2. If you are using our Platform or participating in our Projects, provision of your Personal Data is mandatory and failure to provide your personally identifiable information (“Personal Data”) may result in you being unable to use our platform and/or we being unable to engage you to participate in our Projects and/or issue payments to you.
3. If you do not agree with any term of this Policy, please do not use the Site or Platform and/or involve in the Projects.

### **What Personal Data We Collect & Process**

1. At times, you may be asked to provide to us or our affiliates or our subsidiaries your personally identifiable information (“Personal Data”) including, but not limited to, your name, gender, age, telephone number, nationality, resident status, fax number, home address, email address, any information provided by you to us through all types of electronic application and registration forms or any other similar forms and/or any other information about you that has been or may be collected, stored, used and/or processed by us from time to time.
2. A detailed purpose for which your Personal Data may be used are set out in our Data Policy Statement under section 6 below, including the use of Personal Data for direct marketing.

### **Security**

1. All personal data you provide to us is secured with restricted access by authorized personnel only. We will take reasonable steps to ensure that your personal data held by us is protected from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss.
2. The Site may contain hyperlinks to other websites provided by third parties. We do not control these third-party websites or any of the content contained on those websites. Once you have left our website, we cannot be responsible for the protection and privacy of any information which you provide. You should exercise caution and look at the privacy statement for the website you visit.

### **Data Policy Statement**

1. As our Site or Platform user, it may be necessary for you to provide us with your Personal Data when you apply to us and/or continue to subscribe to and/or participate with us for a service and/or product (“Services”). If your Personal Data is incomplete or incorrect, we may not be able to provide or continue to provide the Services to you.
  1. We shall keep your Personal Data confidential at all times. Our policies and practices with respect to the collection, use, retention, disclosure, transfer, security and access of Personal Data will be in accordance with and subject to the special protections and are as set out in this Policy.
  2. How long we keep your Personal Data depends on the context in which you provided it and the purposes for which we use it. Your Personal Data will be retained for such duration as is reasonably necessary for the fulfilment of the purposes in this Policy or for such period as may be necessary to protect our legal interest. Where necessary, your Personal Data may be stored beyond the period of your subscription, for example where there are legal proceedings pending or where legal requirements necessitate the retention of your data.

3. In this Policy, the following terms shall have the following meaning:
  - “Our affiliates” – means all entity, individual, firm, or corporation, directly or indirectly, through one or more intermediaries, controlling, controlled by, or under common control with us.
  - “Our subsidiaries” – means all corporation or other entity of which a majority of the voting power of the voting equity securities or equity interest is owned, directly or indirectly, by us.
4. You agree that all the Personal Data provided by you to us may be used and retained by us for the following purposes and for other purposes as may be agreed between you and us or required by law from time to time;
  1. providing the Services to you;
  2. providing you with regular communications from us with details of the Services and its benefits;
  3. the normal management, operation and maintenance of the performance of the Services;
  4. research for service improvement and designing new, or improving existing, Services provided by us, our subsidiaries or our affiliates to you;
  5. investigation of complaints, and suspected suspicious transactions;
  6. prevention or detection of crime;
  7. disclosure as required by law.
5. We would also like to use your Personal Data (including your name, telephone number, address and email address and other information provided to us when you register) for direct marketing to you (whether by post, email, phone, SMS or the like) in relation to:
  1. offers and rewards from us;
  2. offers and rewards offered by our subsidiaries and our affiliates;  
Please note that we cannot so use your Personal Data unless we have received your consent.
  3. Additionally, we’ve incorporate features that allow for image capture, upload, and processing for verification purposes. These features will enhance our ability to provide you with a seamless experience while ensuring the security and accuracy of your information.
6. We may disclose and transfer (whether in Thailand, Malaysia or other countries which may or may not have adequate personal data protection standard) to our agents or contractors under a duty of confidentiality to us who provide administrative, data processing, research and marketing, distribution, telecommunications, professional or other similar services to us and to any of our actual or proposed assignees or transferees of our rights with respect to you in connection with a merger, sale or transfer (whether of assets or shares), to use, hold, process or retain such Personal Data for the purposes mentioned in paragraphs 6.4 and 6.5 above on our behalf.

7. You may access, correct or up-date your personal data by accessing the website using your unique login details or by contacting the Customer Service (Please see the section headed “Enquiries/Complaints”) and we will endeavour to comply with your instructions within 21 days of receiving your completed details. We may charge the processing fee for such requests unless the update is conducted as part of the annual exercise carried out by the us. Once we receive your data correction request and if we agree that the data is incorrect, steps will be taken within a reasonable time to correct the data. If we do not agree that the data is incorrect, no correction will be made but we will nevertheless record the fact that you consider that part of the data to be incorrect in the relevant file. If you choose not to furnish any mandatory personal data requested or wish to withdraw your consent or significantly limit the processing of your personal data, you acknowledge and agree that (notwithstanding any agreement between you and us) we will be unable to process your personal data, and any corresponding benefits. When you do so, you acknowledge that we will not be liable for any losses which you suffer as a result of your own action.

### **Your Personal Data Rights**

1. In accordance with the Personal Data Protection law of your country, you may be entitled to:
  1. ask us about the processing of your personal data including to obtain a copy of your personal data;
  2. make correction of incorrect or inaccurate personal data;
  3. request us to provide you with your personal data 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.
  4. object to the collection, use or disclosure of your personal data so we no longer no longer be able to collect, use, or disclose such personal data when:
    1. your personal data are collected, use or disclosed without the exemptions of consent requirements;
    2. your personal data are collected, use or disclosed for the purpose concerning direct marketing;
    3. your personal data are collected, use or disclosed for the purpose of scientific, historical or statistic research that is not necessary to carry out for reasons of public interest by the Company.

We may reject your objection if the collection, use and/or disclosure of your personal data has been done with a compelling legitimate ground or is carried out for the establishment, compliance or exercise of legal claims, or defense of legal claims. We will nevertheless record the fact that you object and our rejection of objection request in the relevant file;

5. erase, destroy, or anonymize your personal data to become the anonymous data which cannot identify the data subject in the following case:
  1. the personal data are no longer necessary for the purpose listed in section 6;

2. you have withdrawn your consent and we do not have legal ground to collect, use or disclose such personal data;
  3. you have successfully objected to the collection, use or disclosure of your personal data; or
  4. your personal data have been unlawfully collected, used, or disclosed;
6. request us to restrict the use of your personal data in the following case:
1. when we are in the process of verifying the requested correction of your personal data;
  2. your personal data are unlawfully collected, used or disclosed.
  3. your personal data are no longer necessary to retain for the purpose listed in section 6 but you have the necessity to request the retention for the purposes of the establishment, compliance, or exercise of legal claims, or the defense of legal claims; or
  4. when we are in the process of verifying or examining your objection to the collection, use or disclosure of your personal data;
7. file a complaint to the relevant supervisory authority if your personal data protection rights are violated or for any non-compliance.

You may make your request by accessing the website using your unique login details or by contacting the Customer Service (Please see the section headed “Enquiries/Complaints”) and we will endeavour to comply with your instructions. We may request you to provide supporting document or other verification means to confirm your identity prior to processing your requests and we may charge the processing fee for such requests.

If you choose not to furnish any mandatory personal data requested or wish to withdraw your consent or significantly limit the processing of your personal data, you acknowledge and agree that (notwithstanding any agreement between you and us) the Company will be unable to process your personal data, and any corresponding benefits. When you do so, you acknowledge that we will not be liable for any losses which you suffer as a result of your own action.

### **Enquiries/Complaints**

If you have any enquiries or complaints concerning this Policy or Data Policy Statement or would like to exercise your rights under any existing rights including limiting or withdrawing your consent, please contact our Governance & Compliance Department at:

- Dattel Pte. Ltd. (Singapore)  
30 Cecil Street, #19-08 Prudential Tower, 049712 Singapore.  
Tel: [+65 6950 7025](tel:+6569507025)
- Dattel Sdn Bhd. (Malaysia)  
5-9-5, Block 5, VSQ@PJ City Centre, Jalan Utara, 46200 Petaling Jaya, Selangor.  
Tel: [+603 7931 1006](tel:+60379311006)
- PT Dattel Mitra Asia (Indonesia)  
HDI Hive Menteng, 5<sup>th</sup> Floor, Unit A-B, Jl. Probolinggo No.18, Menteng, Jakarta 10350

Indonesia.

Tel: [+6221 3917 799](tel:+62213917799)

- Dattel Co. Ltd. (Thai)  
191/13, CTI Tower, Level 29, Ratchadaphisek Road, Khwaeng Khlong Toei, Khet Khlong Toei,  
10110 Bangkok, Thailand.  
Tel: [+662 258 3165](tel:+6622583165)

Email: [compliance@dattel.asia](mailto:compliance@dattel.asia)