

# PRIVACY POLICY

## 1. IMPORTANCE INFORMATION (MUST READ)

This **Policy** applies to **UT Swap platform** and **Zillion United**' s website, accessible from <https://utswap.io/>. This policy is not applicable to any information collected offline or via channels other than this **UT Swap platform** and/or **Zillion United**' s website.

You shall and are advised to read our Private Policy (herein called the "**Policy**") carefully before continuing to use our **UT Swap Platform (UT Swap)** and **Zillion United**' s website. This Policy describes in details how your personal information is being collected, stored, used, disclosed, processed or otherwise managed by **Zillion United** and our affiliates (herein called, "**we**," "**our**," or "**us**"). By using our **UT Swap**, you agree to enter into an agreement with us and you unconditionally agree with all terms contained in this policy without any reservation.

By using our **UT Swap platform**, you consent to our collection, storage, processing and transfer of your personal information as described in this Privacy Policy. **IF YOU DO NOT AGREE WITH ANY OF THESE TERMS, DO NOT USE THIS MOBILE PLATFORM.**

## 2. OUR RESPECT OF YOUR PRIVACY

One of our main priorities is the privacy of our users and visitors. We strive to protect and maintain privacy and transparency of collected information from our Users. Without prejudice to terms of our Policy, we respect all principles of privacy and legal provisions related to privacy under Cambodia laws which we are bound to obey.

## 3. COLLECTION OF INFORMATION

All personal information collected through **UT Swap platform** is voluntarily provided by you. You may decline to provide us any of required information, however you may not be able to use certain services on **UT Swap platform**. Only necessary and relevant information may be collected including your name, gender, date of birth, home address, national ID/passport, email address, phone number and selfies. When you register for an Account, we may ask for your contact information, including items such as a company name, address, email address and telephone number.

Please be aware that the personal information that you are asked to provide is for the purpose of complying with our Know Your Customer ("KYC") obligations required under applicable laws and regulations, and Anti-Money Laundering laws, and other regulations.

## 4. HOW WE USE YOUR INFORMATION

By providing us your personal information, you are voluntarily allowed us or we are entitled to use your personal information for the following purposes:

- Providing, operating, information and maintenance our platform and website
- Improving, personalizing, and expanding our service
- Understanding and analyzing how you use our platform

- Developing new products, services, features, and functionality
- Communicating with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Notifying you the updates about any amendment with regard to our Terms and Policy;
- Securing and protecting our business against any cyber-crime or attempt to commit cyber-crime by allowing us to investigate, detect and take necessary actions to prevent or repress unlawful or unauthorized acts such as fraud, unauthorized access or other threats to carry out illegitimate acts as prohibited under laws and regulations;
- Sharing your personal information with our business partners and third parties so that they can reach out to you directly to demonstrate their products and services; and
- Complying with our internal regulations and external legal obligations, including but not limit to, audits, reports, corporate governance, business operation, dispute resolution and litigation etc.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

By using our **UT Swap**, you are aware and agree that we may disclose your personal information to the following persons/entities:

- Our affiliates: we may disclose your personal information to our affiliated companies, staff, agents and business partners. Their use of your privacy will be subject to this policy.
- Our service providers: we may disclose your personal information to our service providers who are assigned to perform the services for us including hosting, advising, auditing and other relevant services.
- Real estate agency and developers: we may disclose your personal information to real estate agencies and developers who may provide you services of your interest.
- Business transfers: We may disclose your personal information to our forthcoming affiliates that join our company as result of merger and acquisition, asset transfers, succession, bankruptcy or other forms of business transfers.
- Authorities: We may disclose your personal information to public authorities should it be a legal requirement. We may also disclose your personal information to public authorities to protect our rights and claims, should it be necessary to do so.
- Other third parties: We may disclose your personal information to other third parties with permission from you.

## 6. SECURITY AND DATA RETENTION

We are committed to the security and protection of your privacy. To do so, we exploit up-to-date technical and administrative tools and procedure to protect your privacy from unauthorized access or theft etc. However, despite our efforts, it must be

acknowledged that no security measure is ever perfect. We are committed to taking reasonable administrative and technical steps to fix, retribute and prevent future reoccurrence. However, we will not take any responsibility for any events or consequences beyond our control as result of unauthorized access to your personal information. We require that, in the event that the security of your account is being in danger, you report to us immediately.

We will retain your personal information up until the period necessary to fulfill our purposes and business objectives as outlined this Policy or for a longer period as permitted by law.

## 7. EXPORT OF PERSONAL INFORMATION OUTSIDE CAMBODIA

Please be aware that for technology and safety reasons, your personal information provided to us may be held in the servers outside of Cambodia. By providing us your personal information, you agree to allow us to transfer your information outside of Cambodia for the above-mentioned purposes.

## 8. LOG FILES

**UT Swap** follows a standard procedure of using log files. These files log visitors when they visit our platform and/or websites. All hosting companies do this as part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website and gathering demographic information.

## 9. PARTNER OR THIRD-PARTY APPLICATIONS

**UT Swap** may contain links to our business partner or third-party mobile apps, websites or services, which are not under our operation or control. Accordingly, this Policy does not apply to any Mobile App or service operated by any third party. Provided that you click on or by other means visit the third-party applications, you will leave our Mobile App and enter into the third-party applications where you will be subject to their private policy and terms. We encourage you to read their policy carefully, and we also are not responsible for any policy or practices conducted by third party.

## 10. OPTIONS AND RIGHT TO CHOOSE

**Marketing:** you may opt out from receiving marketing-related communications from us by promptly contacting us or by unsubscribing. We will do our best to comply with your request(s). Please be reminded that even if you may opt out from receiving marketing-related communications from us, you will continue to receive certain important administrative messages from us.

**Cookies:** we may use first party and third-party cookies, plugins, and other tools to gather and/or collect information when you access our Services. For example, when you begin using our Services, our server may record your IP address and other

information such as the type of operating system, its version, screen resolution, and other information related to your device. We may record this information for security purposes or for the improvement of your experience in using our Services. We may also collect statistical information in order to continually improve and upgrade our apps from time to time. If you have disabled one or more cookies, we may still use or retain information collected from the previous cookies you used. However, we will stop using the disabled cookie to collect any further information.

**Access, Review, Amendment and Deletion:** You have the right to request for review, amendment, deletion of your personal information, provided that the regulations related to privacy permit so. Should you wish to do so, please feel free to contact us as provided at 11 below.

**Deactivation:** You can deactivate your account at any time by using any means available on **UT Swap** or otherwise by contacting us. Provided that you request us to assist you in such deactivation, we will do our best to respond to your request in an appropriate period of time. Please bear in mind that once your account is deactivated, you will not be able to access any of the services.

**Recordkeeping:** Please bear in mind that we may need to retain certain information for our recordkeeping purposes and/or to realize all transactions that you began prior to requesting a change or deletion. That retained information will remain within our databases and/or other records.

## 11. FUTURE AMENDMENT OF PRIVACY POLICY

We reserve the rights, at our sole discretion, to modify this Policy at any time. In case of amendment, we will provide prior notification of such amendment on our **UT Swap** and it is your own responsibility to review and observe our Policy periodically to keep yourself updated. Amended policy shall become effective from the date as specified in the notification. By using or continuing to use this **UT Swap** on and after the effective date you agree to be bound by the new amended policy. Should you object to any of our revised Terms, you shall immediately cease to use **UT Swap**.

## 12. INQUIRIES, SPECIAL REQUESTS OR ASSISTANCES

If you have any inquiry, special request or assistance with regard to this privacy policy, please feel free to contact us via (+855) 078 880 111. Our team will promptly respond to and/or take appropriate measure to respond to your request in a reasonable period of time.