

# PRIVACY POLICY

## OVERVIEW

This Privacy Policy outlines how Kyber Network Pte. Ltd. collects, uses, maintains and discloses your Personal Data.

Kyber safeguards Personal Data in accordance with the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”). This Privacy Policy supplements but does not supersede nor replace any other consents which you may have previously provided to us in respect of your Personal Data, and your consents herein are additional to any rights which we may have at law to collect, use or disclose your Personal Data.

For the avoidance of doubt, this Privacy Policy forms a part of the terms and conditions governing your relationship with us and should be read in conjunction with the Kyber relevant terms and conditions.

# YOUR CONSENT IS IMPORTANT

When you request information or sign up for our products and services, you may be required to provide us with your Personal Data. In doing so, you agree and consent to Kyber and its affiliates or related companies (collectively referred to herein as “Kyber”, “us”, “we” or “our”) as well as our respective agents, business partners, authorised service providers and relevant third parties collecting, using, disclosing and/or sharing your Personal Data in accordance with this Privacy Policy.

You have the choice, at any time, not to provide your Personal Data or to withdraw your consent to Kyber processing your Personal Data. However, do note that failure to provide such Personal Data or a withdrawal of your consent for us to process your Personal Data may result in Kyber being unable to provide you with effective and continuous products and services.

If you should withdraw your consent to the processing or handling of your Personal Data in respect of any purpose which we may reasonably consider to be essential in order for us to provide you with the products and/or services requested / applied for, we may not be in a position to continue to provide our products or services to you or administer any contractual relationship which may be in place between us. Furthermore, we shall be entitled to treat such withdrawal as your termination of any account / agreement which you may have with us, without prejudice to any rights and remedies which we may have at law against you.

Notwithstanding the generality of the foregoing and for

avoidance of doubt, upon the termination or expiry of your contractual relationship with us (howsoever caused), we may still continue using or disclosing your Personal Data as may be necessary, required, authorised or permitted for compliance with applicable law or as may be requested by the relevant regulatory bodies, government agencies, statutory boards, administrative bodies, authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes to which we may be subject, whether situated locally or overseas.

In addition, there may be circumstances under applicable laws where we are permitted to collect, process and disclose your Personal Data without your consent.

## WHAT TYPES OF PERSONAL DATA DO WE COLLECT?

In this Privacy Policy, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

Examples of such Personal Data you may provide to us may include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via

other forms of interaction with you. You may also provide us with Personal Data of your officers, employees, agents and customers in order for us to provide you with our products and services.

The Personal Data we collect can be either obligatory or voluntary. Obligatory Personal Data are those that we require in order to provide you with our products and services. If you do not provide us with obligatory Personal Data, we would not be able to provide you with our products and services. Voluntary Personal Data are those that are not mandatory in order for us to provide you with our products and services. If you do not provide us with voluntary Personal Data, you can still sign up for our products and services. Obligatory and voluntary Personal Data differ for each products and services and will be indicated in the application forms.

Apart from Personal Data, we may collect other types of information which is not related to an individual and which is anonymous. For example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our customer services.

## **HOW DO WE COLLECT YOUR PERSONAL DATA?**

Generally, we obtain your Personal Data in various ways, such

as:

- when you submit application forms or other forms relating to any of our products or services;
- when you use some of our services (including but not limited to websites, apps and any online accounts established with us);
- when you request that we contact you, be included in an email or other mailing list; or when you respond to our request for additional Personal Data, our promotions and other initiatives;
- when you sign up for or use one of the many services we provide or when you register an account at Kyber website;
- when you sign up for our seminars, events or webinars;
- when you contact us through various methods such as application forms, emails and letters, telephone calls and conversations you have with our staff in a branch. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes;
- from our analysis of your transactions (including but not limited to payment history);
- when you participate in customer surveys or when you sign up for any of our competitions or promotions;
- when you submit a job application;
- when we receive references from business partners and third parties, for example, where you have been referred by them;
- when we seek information from third parties about you, for example, from your ex-employer and the relevant authorities; and
- when you submit your Personal Data to us for any other reasons.

# PERSONAL DATA WE COLLECT FROM OUR WEBSITES

## IP Address

An IP address is a number that is automatically assigned to your computer when you signed up with an Internet Service Provider. When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which you are accessing our website however, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

## Information on Cookies

A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information. The information that we collect is then used to ensure a more personalised service level for our users. You can adjust the settings on your browser so that you will be notified when you receive a cookie, or to disable the cookies associated with our website. Please

refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies. Please note however that you may not be able to enter certain part(s) of our website, and some of the functions and services may not be able to function without cookies. This may also impact your user experience while on our website.

## WHAT IS THE PURPOSE OF PROCESSING YOUR PERSONAL DATA?

Generally, Kyber collects, uses and discloses your Personal Data for the following purposes:

- providing a service and/or product to you;
- communicating with you on matters relating to your account relationship with us or your interest in our products and/or services;
- responding to your queries and requests;
- providing seminars, events or webinars to you managing the administrative and business operations of Kyber and complying with internal policies and procedures;
- matching any Personal Data held which relates to you for any of the purposes listed herein;
- resolving complaints and handling requests and enquiries;
- preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing commercial risks;
- providing media announcements and responses;

- meeting or complying with any applicable laws, regulations, directives, rules, codes of practice or guidelines issued by any legal or regulatory bodies which Kyber may be subject, whether local or overseas (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- legal purposes (including but not limited to obtaining legal advice and dispute resolution); and
- purposes which are reasonably related to the aforesaid.

In addition, where permitted under the terms of the agreement which you have entered into with us and as part of the services which we provide to you, we may from time to time and at our discretion also use your contact particulars (including your phone number and email address) to contact you in order to provide you with information and/or updates which you are entitled to receive in accordance with the terms and conditions of our agreement with you on products and services.

If you are an employee of an external service provider of Kyber, Kyber also collects, uses and discloses your Personal Data for the following purposes:

- issuing building access pass and maintaining building security;
- managing project tenders;
- processing and payment of vendor invoices;
- profiling in media activities; and
- any other purpose reasonably related to any of the above.

If you submit an application to us as a candidate for an



employment or representative position, Kyber also collects, uses and discloses your Personal Data for the following purposes:

- conducting interviews;
- processing your application (including pre-recruitment checks involving your qualifications);
- providing or obtaining employee references and for background screening;
- evaluating and assessing your suitability for the position applied for; and
- any other purposes reasonably related to any of the above.

Where permitted under the Act, Kyber may also collect, use and disclose your Personal Data as follows:

- administering products and/or services offered (including but not limited to the maintenance, management and operation of the products and services, communication with clients, and processing of any receipts and/or payments arising under the account relationship);
- providing cross-referrals to its affiliates or related companies;
- conducting analytics with regard to products and services which you might be interested in;
- organising promotional events and corporate social responsibility projects (including but not limited to taking pictures and recording your video/audio feedback and testimony in relation thereto);
- providing services, products and benefits to you, including promotions and reward programmes;
- matching Personal Data with other data collected for other

purposes and from other sources (including third parties) in connection with the provision or offering of products and services, by Kyber;

- sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you; and
- conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes;
- conducting customer due diligence processes for the purpose of compliance with prevailing legislations.

If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, Kyber may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services (including discounts and special offers).

In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

You have a choice to withdraw your consent for receiving marketing or promotional materials/communication. You may contact us using the contact details found below.

Please be aware that once we receive confirmation that you wish to withdraw your consent for marketing or promotional materials/communication, we will require some time to process your withdrawal request. During this period of time you may still receive marketing or promotional materials/communication. Please note that even if you withdraw your consent for the receipt of marketing or promotional materials, we may still contact you for other purposes in relation to the accounts, facilities or services that you hold or have subscribed to with Kyber.

## TO WHOM DO WE DISCLOSE YOUR PERSONAL DATA?

Your Personal Data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your Personal Data may be disclosed to the following parties:

- affiliates or related companies of Kyber;
- companies providing services relating to insurance and/or reinsurance to Kyber;
- agents, contractors or third party service providers who provide operational services to Kyber, such as courier services, telecommunications, information technology, payment, due diligence, payroll, processing, training, survey, market research, storage, archival or other services to Kyber;

- vendors and other third party service providers in connection with promotions, online campaigns, products and services offered by Kyber;
- credit bureaus and credit reporting agencies;
- any business partners, other financial institutions and their respective service providers;
- our professional advisers such as financial advisors, auditors and lawyers;
- relevant regulatory bodies, government agencies, statutory boards, administrative bodies, authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes to which Kyber may be subject, whether situated locally or overseas;
- counterparties, billing organisations and their respective banks in relation to fund transfers, payments and drawing of cheques;
- brokerage houses, fund houses, registrars, custodians, external banks and investment vehicles in relation to any custodial services and settlement processing;
- external business, referral and charity partners in relation to the marketing and promotion of products, gift redemptions and corporate promotional events; and
- any other party to whom you authorise us to disclose your Personal Data to.

In addition, to the extent that we may need to transfer Personal Data outside of Singapore, whether to our affiliates, related companies, business partners, authorized agents or third party service providers or simply to data storage facilities, we endeavour to do so in accordance with the Act to ensure that we provide a standard of protection to personal data so transferred that is comparable to the protection under the Act.

# HOW DO WE PROTECT YOUR DATA?

The security of your Personal Data is our priority. Kyber takes all physical, technical and organisational measures needed to safeguard Personal Data. We will use all reasonable efforts to protect your information in a highly secure data centre, adhering to strict computer security standards. We have put in place, privacy protection control systems designed to ensure that our customers' information remain safe, secure and private. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Data which is transferred from you or to you via the Internet.

Access to Personal Data is only limited to authorised personnel of Kyber who are fully trained in handling your information. These authorised personnel are required to ensure the confidentiality of your information and to respect your privacy at all times and relevant employment/engagement contracts reflect this obligation.

Personnel who have access to your information will be subjected to disciplinary action should they fail to observe this Privacy Policy and other guidelines, codes or policies which we may issue to them from time to time.

If we disclose any of your Personal Data to our business partners, authorised agents or service providers, we will require them to appropriately safeguard the Personal Data

provided to them.

## HOW LONG MAY WE RETAIN YOUR PERSONAL DATA?

We will only retain your Personal Data for as long as necessary to fulfil the purpose(s) for which it was collected or to comply with legal, regulatory and internal requirements.

## CHANGES TO THIS PRIVACY POLICY

Please note that we may update this Privacy Policy from time to time to ensure that this Privacy Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. If there are material changes to this Privacy Policy, we will notify you by posting a notice of such changes on our website or by sending you a notification directly. Do periodically review this Privacy Policy to stay informed on how we are protecting and managing your information.

Subject to your rights at law, you agree to be bound by the prevailing terms of the Privacy Policy.

# ACCURACY, ACCESS AND CORRECTION OF YOUR PERSONAL DATA

You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with products and services you have requested / applied for.

If there are any changes to your Personal Data or if you believe that the Personal Data we have about you is inaccurate, incomplete, misleading or not up-to-date, please contact us so that we may take steps to update your Personal Data.

You have the right to access your Personal Data. If you would like to request access to your Personal Data, please contact us. Please note that depending on the information requested we may charge a small fee. We may also take steps to verify your identity before fulfilling your request for access to your Personal Data. However, in exceptional circumstances, we reserve the right to deny you access to your Personal Data and may provide an explanation as required or unless permissible by applicable laws.

# GOVERNING LAW

Note that as we are a Singapore registered company, this Privacy Policy has been drafted solely in accordance with the laws of Singapore. We do not represent or warrant that this Privacy Policy complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Policy as such.

# HOW CAN YOU CONTACT US?

If you need to contact us or have any questions on the Privacy Policy, you may contact us at the address below referencing 'Privacy Policy':

Mr. Loi Luu, CEO  
Email: [loiluu@kyber.network](mailto:loiluu@kyber.network),  
09-16, 6 Eu Tong Sen street,  
Singapore 059817