

## 1. General

- (a) This Data Protection and Privacy Statements (“Privacy Statement”) relates to the collection, use and disclosure of Personal Data, including special or sensitive Personal Data, by any member of THE COMPANY (interchangeably referred to as “THE COMPANY”, “we” or “our”). Personal Data is information relating to a natural person or legal person (interchangeably referred to as “you” or “your” in this Privacy Statement).
- (b) The data controller of your data is the entity you have or may have a relationship with or with whom a portfolio is maintained that you are a service provider for. THE COMPANY functions may also be the controller of your Personal Data.
- (c) Personal Data comprises all the details we holds or collects about you, directly or indirectly, your transactions, transactions you effect, information, communications and dealings with including information received from third parties, the public domain, collected through use of our website, cookies, and our online or mobile application services (wherever applicable).
- (d) If you have or are party to more than one portfolio with us, we will link all your portfolios and Personal Data to enable us to have an overall picture of your relationship with us.
- (e) If you do not provide us with the Personal Data for us to meet our legal and regulatory obligations or to enter into an agreement with you we may not be able to provide you with the Services you have requested.

## 2. Purposes for which we may process your Personal Data

- (a) To enable us to fulfil the contract for the Services you have requested, we need to process your Personal Data for purposes including the following:-
  - (i) Processing, applications for the Services, updating records and completing instructions or requests;
  - (ii) Providing the Services;
  - (iii) Assessing suitability for the Services;
  - (iv) Operational purposes;
  - (v) Statistical purposes; and
  - (vi) Establishment, continuation and management of your portfolio
- (b) For some purposes in connection with the Service you have requested, we have a legal or regulatory obligation to the process your Personal Data. These purposes include but not limited to:-
  - (i) The prevention, detection, investigation and prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud, and other financial crime);
  - (ii) Identify verification, government sanctions screening and due diligence checks;
  - (iii) Enforcing obligations, including without limitation the collection of amounts outstanding from you;
  - (iv) To comply with local or foreign law, regulations, directives, judgements or court orders, government sanctions or embargoes, reporting requirements under financial transactions legislation, and demands of any authority, regulator, tribunal, enforcement agency, or exchange body.
- (c) We may also process your Personal Data in line with any voluntary codes; to effect agreements between any member of THE COMPANY and any authority, regulator, or enforcement agency; to comply with policies (including THE COMPANY’s’ policies and procedures) and good practice standards where it is in our legitimate interest to do so.
- (d) We may also process your Personal Data where it is in our legitimate interests to seek professional advice, including, in connection with any legal proceedings (including any prospective legal proceedings), for obtaining legal advice on the establishing, exercising or defending legal rights.

## 3. What Personal Data we collect about you and the source

- (a) Personal Data that we will collect from you includes but not limited to:-

- (i) Passport information and/or identification card number issued by home country;
  - (ii) Marital status and details of dependents;
  - (iii) Contact details include permanent address, current address, mailing address, contact number, and email address;
  - (iv) Information related to Tax Identification number (TIN);
  - (v) Information about the source of fund; and
  - (vi) Information resulting from any form of due diligence checks.
- (b) We may also collect your Personal Data from other sources, including but not limited to your employers, your referral.

#### 4. To whom we may disclose Personal Data

THE COMPANY including our officers, employees, agents, and advisers, may disclose your Personal Data to any of the following parties for any of the purposes specified above:-

- (a) Any member of THE COMPANY anywhere worldwide, including any officer, employee, agent or director;
- (b) Professional advisers (including auditors), third party service providers, agents or independent contractors providing services to support THE COMPANY's business;
- (c) Our business associates who may provide their products or services to you;
- (d) Upon your death or mental incapacity, your legal representative and their legal advisers, and a member of your immediate family for the purposes of allowing him/her to make payment on your portfolio;
- (e) Any person authorised to operate your Portfolio and to act on your behalf in giving instructions, to perform any other acts under our Terms of Business or use any Services;
- (f) Any person to whom disclosure is allowed or required by local or foreign law, regulation;
- (g) Any court, tribunal, regulator, enforcement agency, exchange body, tax authority, or any other authority (including any authority investigating an offence) on their agents;
- (h) Any financial institution to conduct credit checks, anti-money laundering related check, for fraud prevention and detection of crimes purposes;
- (i) Anyone we consider necessary to facilitate requests for the products and services with any business associates of THE COMPANY;
- (j) Anyone we consider necessary in order to provide services in connection with the Services; and
- (k) Any actual or potential participant or sub-participant in relation to any of our obligations in respect to any agreement, assignee, novatee or transferee (or any officer, employee, agent or adviser of any of them located in any jurisdiction).

#### 5. Security

You should be aware that the Internet is not a secure form of communication and sending us any Personal Data over the internet carries with it risks including the risk of access and interference by unauthorised third parties. Information passing over the internet may be transmitted internationally (even when sender and recipient are located in the same country) via countries with weaker privacy and data protection laws than in your country of residence.

#### 6. Other Terms and Conditions

There may be specific terms and conditions in our Term of Business that govern the collection, use and disclosure of your Personal Data. Such other terms and conditions must be read in conjunction with this Privacy Statement.

## 7. Retention

We retain your Personal Data in line with our legal and regulatory obligations and for an operational business.

## 8. Automated decisions and profiling

- (a) We may use risk profiling, including behavioural analysis, to assist us to provide you with better services, to make decisions and to prevent money laundering, terrorism, fraud and other financial crime.
- (b) Profiling will result in an automated decision relating to you, we will let you know and you will have the right to discuss the decision with us.

## 9. Marketing

- (a) We may use your Personal Data:-
  - (i) To conduct market research and surveys with the aim of improving our products and services; and
  - (ii) For marketing purposes and promotional events.
- (b) We process your Personal Data for those purposes because it is in the interest of our business to do so with the intention of improving our Services and generating business. We will not send you marketing material if you have specifically asked us not to do so. You have the right to opt out of receiving the marketing material at any time. To do so please contact your Relationship Manager/Consultant. If you ask us not to send you marketing material or other promotional or research material, we may need to retain a record that you have asked us not to do so to ensure that you do not receive anything further.

## 10. Your rights

Subject to applicable law, regulations and/or guidelines, you may have the following rights;

- (a) Access  
To request a copy of the Personal Data processed in relation to you, THE COMPANY may be allowed by law to charge a fee for this.
- (b) Correction  
To request that we correct your Personal Data. You can do this through your relationship manager.
- (c) Erasure  
To ask us to delete your Personal Data, for example if we no longer have a valid reason to process it.
- (d) Object  
To object to how we process your Personal Data. This does not mean you can decide or choose how we process your Personal Data other than in relation to the marketing. If you have any concern about how we process your Personal Data, please discuss this with your Relationship Manager/Consultant. We may not be able to offer you Services if you do not want us to process the Personal Data we consider it necessary to process to provide the services.
- (e) Restriction  
To restrict how your Personal Data is processed in certain cases, such as when the accuracy of your Personal Data is contested. If you have any concerns about how we process your Personal Data, please discuss this through your Relationship Manager/Consultant.
- (f) Portability  
To request a copy of the Personal Data you have given to us in a readable format.

## 11. Changes to this privacy policy

This Privacy Statement is subject to changes which you are requested to get our latest Privacy Statement which is published on <http://www.qx-trust.com/bdd/ps.pdf>.

**12. Cookies**

Please see our separate Cookies Policy at <http://www.qx-trust.com/bdd/ps.pdf>.

**13. Linked websites**

This Privacy Statement does not apply to third-party's websites where our online advertisements are displayed or to linked third-party websites which we do not operate or control.

**14. Acknowledgement**

By submitting whatsoever form of Sign Up Form prepared by us, and/or by signing whatsoever forms prepared by us, you acknowledge that you have read, understand, and accept this Privacy Statement.

THE REMAINING OF THIS DOCUMENT IS INTENTIONALLY LEFT BLANK

