

XEN WEBSITE PRIVACY POLICY

This privacy policy ("Policy") describes how Xen Technologies Pte. Ltd. and its related companies ("Company") collect, use and share personal information of consumer users of this website, <https://xen.net/> (the "Site"). This Policy also applies to any of our other websites that post this Policy. This Policy does not apply to websites that post different statements.

WHAT WE COLLECT AND HOW WE PROCESS YOUR PERSONAL INFORMATION

The Company collects only what we need and will not share your personal information with any third parties other than we identity verification partner. We get information about you in a range of ways. We may collect your name, email address, and other information when you give it directly to us on our site, from other sources, and through automatically logged information about you, your computer, mobile device, or any access device upon visiting our site. This may include IP address, device information, name, type, operating system, network information, web log information, browser, and the pages accessed on our website. It may also include geographical location data to determine your location.

We do not collect any sensitive data such as: race or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic or biometric data, health or mortality, sex life or sexual orientation, unless required by law. However, you may be required to provide us with additional information and documents that we deem required to comply or maintain compliance with the law. These documents include, but are not limited to, passports, driver's licenses, utility bills, photographs, government identification cards and such other documents that may be requested by the Company.

The Company may refuse your access to the Site should you fail to submit any or all of the required documents and information, or should the Company have any doubt on the validity, veracity, accuracy, authenticity and genuineness of the documents and information.

We collect Personal Data about you, subject to applicable law, from a variety of sources as follows:

- We obtain your Personal Data when you provide it to us (e.g., where you contact us via email or telephone, or by any other means).
- We collect your Personal Data in the ordinary course of our relationship with you (e.g., in the course of communication with you or any other relevant and related activity).
- We collect Personal Data that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible).
- We receive your Personal Data from third parties who provide it to us (e.g., your employer; our customers; credit reference agencies; law enforcement authorities; etc.).
- We receive your Personal Data from third parties, where you purchase any of our products or services through such third parties.
- We collect or obtain Personal Data when you visit our Site or use any features or resources available on or through a Site. When you visit a Site, your device and browser

may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

Creation of Personal Data: We may also create Personal Data about you, such as records of your interactions with us, and details of your accounts, subject to applicable law.

Relevant Personal and Sensitive Personal Data: The categories of Personal Data about you that we may Process, subject to applicable law, are as follows:

- **Personal details:** given name(s); preferred name; nickname(s), gender; date of birth / age; marital status; Social Security Number; Passport number(s); other Government(s) issued numbers (tax identification number, Green Card(s) number(s) including Driving Licence number); nationality; lifestyle and social circumstances; images of Passports; images of Driving Licences and other identification cards; images of Gun Licence(s); images of signatures; authentication data (passwords, mother maiden name, challenge/response questions and answers, PINs, face recognition, voice recognition) and photograph, visual images, personal appearance and behaviour.
- **Family details:** names and contact details of family members and dependents.
- **Contact details:** address; telephone number; fax number; email address; and social media profile details.
- **Employment details:** industry; role; business activities; names of current and former employers; work address; work telephone number; work fax number; work email address; and work-related social media profile details.
- **Education history:** details of your education and qualifications.
- **Financial details:** bank account numbers; credit card numbers; cardholder or account-holder name and details; instruction records; transaction details; and counterparty details.
- **Views and opinions:** any views and opinions that you choose to send to us, or publish about us on (including on social media platforms).
- **Electronic Identifying Data:** IP address cookies, logs, online identifiers, device IDs, geolocation.

Processing your Sensitive Personal Data: We do not seek to collect or otherwise Process your Sensitive Personal Data, except where:

- the Processing is necessary for compliance with a legal obligation (e.g., to comply with our diversity reporting obligations);
- the Processing is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law;
- you have manifestly made those Sensitive Personal Data public;
- the Processing is necessary for the establishment, exercise or defence of legal rights;

- we have, in accordance with applicable law, obtained your prior explicit consent prior to Processing your Sensitive Personal Data (as above, this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way); or
- Processing is necessary for reasons of substantial public interest and occurs on the basis of an applicable law that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests.

We only Process Criminal Offenses Data, and national identification numbers, to the extent required or permitted by applicable law.

Purposes for which we may Process your Personal Data, and legal bases for Processing: The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

USE OF PERSONAL INFORMATION

We use your personal to understand, process and meet your needs and preferences in using our services. These personal information can also be used to develop new, or improve on our existing services, and develop our business and operations.

We use your personal information to communicate via newsletter or email, for processing of your data, to determine your eligibility or authority to participate in certain activities or actions, and for compliance with the different requirements of the laws. We will not release your personally-identifying information to any third party without your consent, except as herein set forth.

The purposes for which we may Process Personal Data, subject to applicable law, and the legal bases on which we may perform such Processing, are:

AML/KYC: fulfilling our regulatory compliance obligations, including ‘Know Your Client’ checks; and confirming and verifying your identity (including by using credit reference agencies); and screening against government, supranational bodies (including but not limited to the European Union and the United Nations Security Council) and/ or law enforcement agency sanctions lists as well as internal sanctions lists and other legal restrictions. The Processing is necessary for compliance with a legal obligation; or The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or We have a legitimate interest in carrying out the Processing for the purpose of protecting against fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or the Company have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Client on-boarding: on-boarding new clients; and compliance with our internal compliance requirements, policies and procedures. The Processing is necessary in connection with any contract that you may enter into with us, or to take steps prior to entering into a contract with us; or We have a legitimate interest in carrying out the Processing for the purpose of on-boarding new clients (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Credit worthiness: conducting credit reference checks and other financial due diligence. We have a legitimate interest in carrying out the Processing for the purpose of conducting financial due diligence (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Provision of products and services to you: administering relationships and related services; performance of tasks necessary for the provision of the requested services; communicating with you in relation to those services. The Processing is necessary in connection with any contract or agreement of whatever nature that you may enter into with us whether currently or in the future, or to take steps prior to entering into a contract with us; or We have a legitimate interest in carrying out the Processing for the purpose of providing services to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Communicating with you via any means (including via the Site, email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law; and maintaining and updating your contact information where appropriate. We have a legitimate interest in carrying out the Processing for the purpose of conducting marketing and prospecting (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Operation of our Site; operation and management of our Sites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our Sites. The Processing is necessary in connection with any communication we are requested to provide you upon your inquiry, or contract that you may enter into with us of whatever nature, or to take steps prior to entering into a contract with us; or We have a legitimate interest in carrying out the Processing for the purpose of providing our Sites to you (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

IT operations: management of our communications systems; operation of IT security; and IT security audits. The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of managing and operating our IT systems and ensuring the security of those systems (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Health and safety: health and safety assessments and record keeping; and compliance with related legal obligations. The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of providing a safe and secure environment at our premises (to the extent that

such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or The Processing is necessary to protect the vital interests of any individual.

Financial management: sales; finance; corporate audit; and vendor management. We have a legitimate interest in carrying out the Processing for the purpose of managing and operating the financial affairs of our business (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Research: conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services. We have a legitimate interest in carrying out the Processing for the purpose of conducting research and producing analysis (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Security: physical security of our premises (including records of visits to our premises and CCTV recordings); and electronic security (including login records and access details, where you access our electronic systems). The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of ensuring the physical and electronic security of our business and our premises (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law. The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, breaches of our policies and applicable laws (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Legal compliance: compliance with our legal and regulatory obligations under applicable law. The Processing is necessary for compliance with a legal obligation.

Legal proceedings: establishing, exercising and defending legal rights. The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of establishing, exercising or defending our legal rights (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Improving our products and services: identifying issues with existing products and services; planning improvements to existing products and services; and creating new products and services. We have a legitimate interest in carrying out the Processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms); or We have obtained your prior consent to the Processing (this legal basis is only used in relation to Processing that is entirely voluntary – it is not used for Processing that is necessary or obligatory in any way).

Risk Management: Audit, compliance, controls and other risk management. The Processing is necessary for compliance with a legal obligation; or We have a legitimate

interest in carrying out the Processing for the purpose of managing the levels of risk to which our business is exposed (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

Fraud prevention: Detecting, preventing and investigating fraud. The Processing is necessary for compliance with a legal obligation; or We have a legitimate interest in carrying out the Processing for the purpose of detecting, and protecting against, fraud (to the extent that such legitimate interest is not overridden by your interests, fundamental rights, or freedoms).

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

We reserve our right to share your personal information to our partners, affiliates, subsidiaries and other third parties pursuant to the uses of personal information we have set forth, and by continuing to access this website, you hereby consent to sharing of your personal information with our banking partners, companies that our Company may merge with or be acquired by, third party identification services providers, law enforcement agencies, government officials, or other third parties when required by a subpoena, court order, or other legal procedure, or when the Company believes that sharing thereof is necessary to prevent physical harm or financial loss. We may also share personal information when we do a business deal, or negotiate a business deal, involving the sale or transfer of all or a part of our business or assets. These deals can include any merger, financing, acquisition, or bankruptcy transaction or proceeding. We may also share information to protect the rights and property of Xen Technologies Pte. Ltd., our agents, customers, and others. This includes enforcing our agreements, policies, and terms of use, to protect the safety of our employees and agents, our customers, or any person, and in the form of aggregated and/or anonymized data with others for their own uses.

In addition, we may disclose your Personal Data to:

- you and, where appropriate, your family, your associates and your representatives;
- clients and customers of our businesses;
- credit reference agencies;
- anti-fraud services;
- Governmental, legal, tax and regulatory, or similar authorities, ombudsmen, and central and/or local government agencies, upon request or where required, including for the purposes of reporting any actual or suspected breach of applicable law or regulation;
- accountants, auditors, financial and tax advisors, lawyers, notaries and other outside professional advisors, subject to binding contractual obligations of confidentiality in accordance with applicable law;
- banks, non-bank lenders, company administrators, trade and corporate registries and depositaries;
- general partners of funds related to the Company;
- debt-collection agencies and tracing agencies;

- data aggregation services;
- accreditation bodies;
- any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defence of legal rights in accordance with applicable law;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;
- to any relevant party in connection with AML/KYC requirements; any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets (including in the event of a reorganization, dissolution or liquidation) or the assets or business of our funds;

Our Sites may use third party plugins or content. If you choose to interact with any such plugins or content, your Personal Data may be shared with the third party provider of the relevant social media platform. We recommend that you review that third party's privacy policy before interacting with its plugins or content.

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to: (i) only Process the Personal Data in accordance with our prior written instructions; and (ii) use measures to protect the confidentiality and security of the Personal Data; together with any additional requirements under applicable law.

INTERNATIONAL TRANSFER OF PERSONAL DATA

Because of the international nature of the activities of the Site and the Company, we may need to transfer your Personal Data to our partners, affiliates and subsidiaries, and to third parties as noted in Section 3 above, in connection with the purposes set out in this Policy. For this reason, we may transfer your Personal Data to other countries that may have different laws and data protection compliance requirements, including data protection laws of a lower standard, to those that apply in the country in which you are located.

Where we transfer your Personal Data to other countries, we do so on the basis of:

- European Commission's adequacy decisions;
- our binding corporate rules;
- suitable standard contractual clauses; or
- other valid transfer mechanisms.

DATA RETENTION

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal requirements). When we have no ongoing business need to process your information, we will delete it, or if this is not possible (for example, because your personal information has been archived), then we will securely store your personal information until deletion is possible.

It is possible that personal information may be stored in a secure blockchain, which are by nature, immutable. The Company does not and cannot control, the use, access, decryption, and storage of the data. The Company does not and cannot guarantee the privacy of the data stored in the blockchain.

SECURITY

We have implemented appropriate technical and organizational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law.

We endeavor to take all reasonable steps to protect your personal information, but cannot guarantee the security of any data you disclose online. Please note that email is not a secure medium and should not be used to send confidential or sensitive information. You accept the inherent security risks of providing information over the Internet and will not hold us responsible for any breach of security, unless this is due to our negligence or willful default.

You are responsible for ensuring that any Personal Data that you send to us are sent securely.

INFORMATION CHOICES AND CHANGES

Our marketing emails may tell you how to “opt-out” or unsubscribe. If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you.

You may send requests about personal information to our Contact Information. You can request to change contact choices, opt-out of our sharing with others, and update your personal information.

You may send requests about personal information to our Contact Information. You can request to change contact choices, opt-out of our sharing with others, and update or delete your personal information. You can also ask to review any of the personal information that we have retained, how we have used it, and to whom we have disclosed it at any time by contacting us. Subject to certain exceptions prescribed by law, and provided we can authenticate your identity, you will be given reasonable access to your personal information and will be entitled to challenge the accuracy and completeness of the information and have it amended as appropriate.

You can typically remove and reject cookies from our Site with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how our Site works for you.

CONTACT INFORMATION

We welcome your comments or questions about this privacy policy. You may also contact us at our address:

Xen Technologies Pte. Ltd.

5 Temasek Boulevard #04-03A Suntec Tower Five, Singapore (038985)

Email: info@xen.net

RIGHTS SPECIFIC TO THE GDPR

If you are a data subject for purposes of the GDPR, you have a number of important rights, including rights to:

Fair processing of information and transparency over how we use your use personal information;

- Access to your personal information and to certain other supplementary information that this Policy is already designed to address;
- Require the correction of any mistake in the personal information that we hold about you;
- Require the erasure of personal information concerning you in certain situations;
- Receive the personal information concerning you that you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations;
- Object at any time to the processing of your personal information for direct marketing;
- Object to decisions being taken by automated means that produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal information; and
- Otherwise restrict our processing of your personal information in certain circumstances.
- For further information on each of these rights, including the circumstances in which they apply, guidance is available from applicable data protection authorities.

CHANGES TO THIS PRIVACY POLICY

We may change this privacy policy. If we make any changes, we will change the Last Updated date above.

ACCEPTANCE

By continuing to access this site and using the Services, you signify your agreement to this Policy. The Company reserves the right to change this Policy at any time. If we make any material changes to this Policy, the revised Policy will be posted here and notified to our users at least 30 days prior to the changes taking effect, so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it. Please check this page frequently to see any updates or changes to this Policy.