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Recommended by:	Head of Compliance	Approved by:	Director	Valid from:	25 February 2019

MX GLOBAL SDN BHD PRIVACY POLICY

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Director's Sign-off

Approved by	Signatory	Date
Jason Chan Ling Khee	-Approved-	25 February 2019

Head of Compliance's Sign-off

Recommended by	Signatory	Date
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TABLE OF CONTENTS

1. INTRODUCTION	1
2. OBJECTIVE.....	2
3. SCOPE	2
4. THE TYPE OF PERSONAL DATA	3
5. HOW WE COLLECT PERSONAL DATA.....	4
6. HOW WE USE YOUR PERSONAL DATA	5
7. DISCLOSURE OF PERSONAL DATA.....	7
8. SECURITY OF YOUR PERSONAL DATA	8
9. GLOBAL COMPANY.....	9
10. ADDITIONAL MATTERS RELATING TO PERSONAL DATA.....	10

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1. INTRODUCTION

- 1.1 This Privacy Policy (the “Policy”) describes how we collect, process, use and disclose your personal data in relation to your access and use of MX Global products and services.
- 1.2 MX Global is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.
- 1.3 We are committed to ensuring that your personal data is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the personal data we collect online.
- 1.4 BY SUBMITTING YOUR INFORMATION, SIGNING UP ON THE WEBSITE AND/OR OTHER CONFIRMATION, AND/OR BY USING THE PRODUCTS AND/OR SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR PERSONAL DATA AND INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY AND CONFIRM THAT YOU ARE BOUND BY THIS PRIVACY POLICY.
- WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE ANY OF THE PRODUCTS AND/OR SERVICES OR GIVE US ANY OF YOUR PERSONAL DATA AND/OR INFORMATION.
- 1.5 If you do not provide us with some or all of the information requested by MX Global or withdraw your consent to MX Global collecting and using your personal data, MX Global will be unable to provide or continue to provide you with our products and services.

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2. OBJECTIVE

2.1 The objectives of this Policy are to:

- Provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data.
- Demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have.
- Describe the ways in which we collect, use, disclose and retain your personal data.
- Ensure that we comply with the Personal Data Protection Act 2010 (“PDPA”).
- Facilitate our compliance with any further developments in the protection of personal data.

3. SCOPE

3.1 This privacy policy explains:

- a) The type of personal data
- b) How we collect personal data
- c) How we use your personal data
- d) Disclosure of personal data
- e) Security of your personal data
- f) Global Company
- g) Additional matters relating to personal data

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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4. THE TYPE OF PERSONAL DATA

4.1 Generally, some of our products and services require us to know who you are so that we can best meet your needs. When you sign-up on our Website, access our products and/or services, submit information, or through any interaction with us via application or registration forms, emails, telephone calls, short messaging services, texts or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you.

Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- contact data (name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, personal interests, and any other information provided to us in any forms you may have submitted to us, interaction with MX Global and its agents/employees, or through opening an account with MX Global);
- other information that you voluntarily choose to provide to us (such as information shared by you with us through emails);
- financial information;
- information received by body corporate under lawful contract or otherwise;
- your use of our products and/or services, including data of investment history, volume, patterns, predictions, trends;
- email and telephone call data records;
- your use of our Website and products and/or services, including cookies, IP address, policy and usage history information; and
- your usage of and interaction with our Website, products and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our Website.

The information collected from you by MX Global may constitute personal data under the PDPA.

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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5. HOW WE COLLECT PERSONAL DATA

5.1 We obtain personal data and information in various ways, including but not limited to:

- when you register an account with MX Global through our website;
- through your relationship with us, for example information provided by or collected from you when using our products or services, when taking part in customer surveys, competitions and promotions;
- from an analysis of the way you use and manage your account with us, from the transactions you make and from the payments which are made to/from your account;
- when you contact MX Global through various methods such as application forms, email, letters and telephone calls. 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;
- when we obtain any data and information from third parties (e.g. credit reference agencies, regulatory and enforcement agencies, identity verification services) and/or
- from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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6. HOW WE USE YOUR PERSONAL DATA

6.1 Other than as stated above, we may use your personal data and information for one or more of the following purposes:

- for the specific purpose for which the personal data and/or information was provided;
- to verify your identity as required by the Securities Commission of Malaysia and any applicable authorities and law;
- in the case of investors looking to allocate capital, to confirm that you are eligible to make investments through the website in accordance with relevant legislation;
- to comply with any compliance and disclosure requirements of any and all governmental and/or, agencies, regulatory and/or statutory bodies;
- to comply with any legal obligation binding on us under any law, rule, regulation, by-law, order, guideline, directive, policy and such other requirements in force and as amended from time to time;
- for the purposes of record-keeping in the ordinary course of MX Global's business;
- any purposes relating to the activities on our Website;
- to confirm your identity and ensure that you are eligible to access and use the products and/or services provided on our Website;
- to process and, where necessary, respond to your application(s), enquiry(s), or request(s) or communicate with you;
- to conduct credit assessment and due diligence checks on you in accordance with all applicable laws and MX Global's internal 'know your customer' and Anti-Money Laundering/Countering the Financing of Terrorism policies;
- to enable MX Global to comply with all of its legal and regulatory obligations;
- to inform or update you about products, or services that you request from MX Global or that may interest you, where you have consented to be contacted for such purposes;
- to update you about changes to our Website or MX Global's operations;
- to monitor, improve, and administer our Website and the products and services provided through it, and conduct statistical or other forms of analysis for purposes of maintaining or improving our Website and MX Global's products and services in general; or

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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- to comply with all proceedings or inquiries from any state, regulatory, or enforcement agency;
- to enforce or defend our legal rights and/or obtaining legal advice;
- for purpose(s) that a reasonable person would consider appropriate in the circumstances; and where you have been informed in accordance with this Privacy Policy, to the extent applicable.

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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7. DISCLOSURE OF PERSONAL DATA

7.1 As a part of providing you with our products and services, and for the management and operations of these products and services, and to comply with legal and regulatory requirements, we may be required or need to disclose personal data and/or information about you and your account with us to the following third parties:

- companies and organisations that act as our agents, affiliates and/or professional advisers;
- companies and organisations that assist us in processing or otherwise fulfilling transactions that you have requested;
- law enforcement, regulatory compliance and governmental agencies;
- your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
- any other person notified by you as authorised to give instructions or to use the accounts, facilities, products or services on your behalf.

The aforementioned third parties may in some instances be located outside of your country. You consent to us transferring your personal data outside Malaysia in these instances. Save as set out in this Privacy Policy, we will otherwise treat your personal data as private and confidential and will not disclose your personal data to anyone outside MX Global except:

- where you have given permission;
- where we are required or permitted to do so by law;
- where required or authorised by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over MX Global;
- where we may transfer rights and obligations pursuant to our agreement with you;
- where we are required to meet our obligations to any relevant regulatory authority (whether in or outside your country).

Document Title:	Privacy Policy	Reference no:	MX/COMP/P/19/1.0	Classification:	External
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8. SECURITY OF YOUR PERSONAL DATA

8.1 Your personal data is maintained by MX Global in electronic form on its equipment, and on the equipment of its employees. Such personal data may also be converted to physical form from time to time. MX Global has implemented and will continue to maintain security measures adequate to prevent the unauthorised collection, use, processing, disclosure, copying, modification, and disposal of your personal data. Nevertheless, you acknowledge and agree that communications through the Internet are not entirely secure and that any information transferred to MX Global is done so at your own risk. MX Global does not warrant or guarantee that the information you provide will not be accessed, copied, used, processed or disposed of in breach of MX Global security measures, and you agree not to hold MX Global liable or responsible for any loss or damage resulting therefrom. In the event of such a breach, MX Global will, as far as reasonably possible, promptly notify all affected persons.

No administrator at MX Global will have knowledge of your password. You accept that you are responsible for keeping confidential your username and password to your account with MX Global. Be sure to log off from our Website when finished. MX Global does not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorised use of your account, you must immediately MX Global by sending an email to support@mx.exchange

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9. GLOBAL COMPANY

- 9.1 The personal data we collect may be transferred to, stored and processed outside of the jurisdiction in which you reside, and the laws of those countries may differ from the laws applicable in your own country. For example, data collected in the European Economic Area (EEA) may be transferred to, stored and processed at a destination(s) outside of the EEA. Any processing of such data will be undertaken by our staff, or the staff of our third-party service providers, whose roles will include verifying your identity, processing payment details, and providing customer support.

By accepting this Privacy Policy, and then submitting your personal data, you agree to the transfer, storing or processing of it outside of your jurisdiction.

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10. ADDITIONAL MATTERS RELATING TO PERSONAL DATA

10.1 Retention of personal data

MX Global will retain your personal data in compliance with this Privacy Policy and the terms and conditions of your agreements with MX Global for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of MX Global and its customers, and as required by MX Global's relevant policies, and as required by the law.

10.2 Incomplete personal data and information

Where indicated (for example in application forms or account opening forms), it is obligatory to provide your personal data and information to us to enable us to process your application for our products or services. Should you decline to provide such obligatory personal data or information, we may not be able to process your application/request or provide you with our products or services.

10.3 Your right to access and update your personal data and information

You have a right to access your personal data and information. Please contact customer support if you wish to have access to your personal data and information. MX Global will take steps to verify your identity before fulfilling your request.

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. MX Global may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new personal data or information to avoid fraud and inaccuracy.

10.4 Revisions to this Privacy Policy

This Privacy Policy may be revised by us from time to time. If there are any material changes, MX Global will notify you (e.g. by email communication or posting a prominent notice).

10.5 Contacting MX Global in relation to personal data and information.

Should you have any query in relation to this Privacy Policy or how we handle your personal data and information, kindly contact support@mx.exchange

10.6 Language

In accordance with Section 7(3) of the PDPA, this Privacy Policy is issued in both Bahasa Malaysia and English languages. In the event of any inconsistency, the English language version of this Privacy Policy shall prevail.