



# Privacy Policy

## Privacy Policy for Online Services

Last update: 16 August 2024

Version: 3.0



## Personal Information Collected and Processed

When you use our digital services, we will collect and process your personal information, as stated below:

1. name;
2. NRIC/Passport number;
3. date of birth;
4. residential address;
5. mailing address;
6. bank account details;
7. any personal information contained in the bank statements you submit to us;  
and
8. tax identification number.

We collect your personal information from the following sources:

1. the forms that you complete when engaging our services; and
2. any other information that you provide us in order for us to provide you with our services.

## How do we use the personal information?

When you access our digital services, we may use personal information for the following purposes:

1. **For identity verification, KYC/AML requirements and account set-up and management.** As part of providing services, or information about our services, to you, we will need to collect and verify your identify to set up your account and we will need to use those details in order to effectively manage your account with us to ensure that you receive the best possible service from us. We employ the services of third-party service providers to carry out credit and/or identity checks. It is not only in our legitimate interest to do so but the use of your personal information is required for us to know who you are as we have a legal obligation to comply with certain Know Your Customer regulatory obligations.



2. **To provide you with products and services, or information about our products and services, and to review your ongoing needs.** When you open an account with us, or subscribe to any of our services, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that you receive the best suited products and services and we may periodically review your needs to ensure that we deliver the most suitable products and services to you.
3. **Improving our products and services, and develop new products and services.** We may occasionally use personal information provided by you through your use of our services and/or through customer surveys to help us improve our products and services. To remain as one of the best the market has to offer, we strive to continuously bring you better products and services, and the use of your personal information will help us help you.
4. **Client profiling.** We may periodically use personal information about you to create profiles about you for us to provide you with the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.
5. **In order to investigate or settle enquiries or disputes.** We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.
6. **For compliance with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities.** We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.
7. **Client references.** Occasionally, third-parties, such as credit agencies, may approach us to provide a credit reference about you for credit and identity



checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to comply with a legal obligation. However, if we are unsure or otherwise legally required to, we will contact you first before providing any reference.

8. **Surveys.** We may periodically send you surveys as part of our customer feedback process and it is in our legitimate interest thusly to ensure that we provide the best service to you. We may, from time to time, also ask you to participate in other surveys and if you agree to participate in such surveys, we rely on your consent to use the personal information we collect as part of such surveys. All responses to any survey we send out whether for customer feedback or otherwise will be aggregated and depersonalised before survey results are shared with any third-parties.
9. **Data analytics and marketing.** Our digital services, webpages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymised form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market. Furthermore, we may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing material, we will either do so as it is in our legitimate interest or is with your consent.
10. **Internal business purposes and record keeping requirements.** We may need to process your personal information for internal business research and record keeping purposes. Such processing is in our legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.



11. **Corporate restructuring.** Should we undergo corporate restructuring, or part or all of our business is acquired by a third-party, we may need to use your personal information in association with that restructure or acquisition. Such use may include disclosing your details as part of a due diligence exercise. It is our legitimate interest to use your information in this way provided we are in compliance with any legal obligation we have to you.

12. **Your rights and our obligations.** The information about any rights that might be available to you in relation to the personal information we hold about you is set out below.

(a) **Access.** When requested, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable administration fee in accordance with applicable laws and regulations.

(b) **Rectification.** If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. Upon request and where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

(c) **Limitation.** You may limit the processing of your personal data by notifying us to do so.

### Disclosure Of Your Personal Information

In order to provide you with our services, we will disclose your personal information to the following parties:

1. regulators in relevant jurisdictions.
2. third party service providers engaged by UTrada at our discretion.



The purpose of such disclosure is to fulfil certain compliance requirements as required under the law and for the fulfilment of certain services which are provided by the third-party service provider.

By using the UTrada service, you consent to the transfer of your personal data to countries which are located outside of the relevant jurisdictions.

### **Usage Of Our Services**

You must provide us with your personal information in order to use our services. You will not be able to use our services if you fail to provide us with your personal information.

### **Contact Us**

For any further information or enquiries on your rights to your personal information or any complaints you may have in respect of our processing of your personal information, you may contact:

Customer Support:

- Email: [contact@utrada.com](mailto:contact@utrada.com)