

For Indonesia P2P Loan Users

WEBSITE PRIVACY POLICY

This website is operated by PT Mediator Komunitas Indonesia, a company incorporated under the laws of the Republic of Indonesia, having its registered address at: Wisma Barito Pacific, Lt.6 Tower A Jl. Letjend S.Parman Kav.62-63 Kelurahan Slipi, Kecamatan Palmerah, Kota Administrasi, Jakarta Barat ("Crowdo", "we", "us", "our").

Your privacy is important to us. This Personal Data Protection Policy explains our policy on collecting, using and disclosing your Personal Information. The processing of your Personal Information is also subject to applicable laws. The Personal Information which you provide to us whether from now on or previously will be used and processed, and continued to be used and processed by us, in accordance with this Personal Data Protection Policy (as amended, varied or revised from time to time). We will take reasonable care and precaution to prevent the loss or misuse of your Personal Information. We may amend, vary or revise this Personal Data Protection Policy from time to time. If we revise the Policy, we will post the changes on our website or send a copy of the revised Policy to you by post or email.

"Personal Information" means any information in our possession or control that relates to you to the extent that you may be identified or identifiable from that information or in combination with other information in our possession.

If you have any comments, suggestions or complaints, you can contact us *via e-mail at enquiry@crowdo.com*

Collection of Personal Information

When you create a Crowdo account, or otherwise provide us with your personal information through the Platform, the personal information we collect may include your, Name, Email Address, Residential Address and Contact Number.

You must only submit to us information which is accurate and not misleading and you must keep it up to date and inform us of changes (more information below). We reserve the right to request for documentation to verify the information provided by you.

We will only be able to collect your personal information if you voluntarily submit the information to us. If you choose not to submit your personal information to us or subsequently withdraw your consent to our use of your personal information, we may not be able to provide you with our Services. You may access and update your personal information submitted to us at any time as described below.

If you provide personal information of any third party to us, we assume that you have obtained the required consent from the relevant third party to share and transfer his/her personal information to us.

If you sign up for Crowdo using your social media account or link your Crowdo account to your social media account or use certain other Crowdo social media features, we may access information about you which you have voluntarily provided under your social media provider in accordance with the provider's policies and we will manage your personal data which we have collected in accordance with Crowdo's privacy policy.

Use and Disclosure of Personal Information

The personal information we collect from you will be used, or shared with third parties (including related companies, third party service providers, and third party sellers), for some or all of the following purposes:

- To facilitate your use of the Services (as defined in the Terms of Use) and/or access to the Platform;
- To process transaction(s) you submit through the Platform;

- To update you on the status of the transaction(s);
- To compare information, and verify with third parties in order to ensure that the information is accurate;
- Further, we will use the information you provide to administer your account (if any) with us; verify and carry out financial transactions in relation to transaction you make online; audit the downloading of data from the Platform; improve the layout and/or content of the pages of the Platform and customize them for users; identify visitors on the Platform; carry out research on our users' demographics and behaviour; provide you with information we think you may find useful or which you have requested from us, including information about our or third party sellers' products and services, provided you have indicated that you have not objected to being contacted for these purposes;
- When you register an account with Crowdo or otherwise provide us with your personal information through the Platform, we will also use your personal information to send you marketing and/or promotional materials from time to time. You can unsubscribe from receiving marketing information at any time by using the unsubscribe function within the electronic marketing material. We may use your contact information to send newsletters from us and from our related companies; and
- In exceptional circumstances Crowdo may be required to disclose personal information, such as when there are grounds to believe that the disclosure is necessary to prevent a threat to life or health, or for law enforcement purposes, or for fulfillment of legal and regulatory requirements and requests.

Crowdo may share your personal information with third parties and our affiliates for the abovementioned purposes, specifically, completing a transaction with you, managing your account and our relationship with you, marketing and fulfilling any legal or regulatory requirements and requests as deemed necessary by Crowdo. In sharing your personal information with them, we endeavor to ensure that the third parties and our affiliates keep your personal information secure from unauthorized access, collection, use, disclosure, or similar risks and retain your personal information only for as long as they need your personal information to achieve the abovementioned purposes.

In disclosing or transferring your personal information to third parties and our affiliates located overseas, Crowdo take steps to ensure that the receiving jurisdiction has in place personal information protection standards.

Crowdo does not engage into the business of selling customers' personal information to third parties.

Withdrawal of Consent

You may communicate your objection to our continual use and/or disclosure of your personal information for any of the purposes and in the manner as stated above at any time by contacting us at our e-mail address below.

Please note that if you communicate your objection to our use and/or disclosure of your personal information for the purposes and in the manner as stated above, depending on the nature of your objection, we may not be in a position to continue to provide our products or services to you or perform on any contract we have with you. Our legal rights and remedies are expressly reserved in such event.

Updating Your Personal Information

You can update your personal information anytime by accessing your account on the Crowdo Platform. If you do not have an account with us, you can do so by contacting us at our e-mail address above.

We take steps to share the updates to your personal information with third parties and our affiliates with whom we have shared your personal information if your personal information is still necessary for the above stated purposes.

Accessing Your Personal Information

If you would like to view the personal information we have on you or inquire about the ways in which your personal information has been or may have been used or disclosed by Crowdo within the past year, please contact us at our e-mail

address below. We reserve the right to charge a reasonable administrative fee for retrieving your personal information records.

If you have an account with Crowdo, you may access details of your order by logging into your account on the Platform. Here you can view the details of your orders that have been completed, those which are open and those which are shortly to be dispatched and administer your address details, bank details and any newsletter to which you may have subscribed. You undertake to treat your Crowdo username, password and order details confidentially and not make it available to unauthorized third parties. We cannot assume any liability for misuse of your Crowdo username, password or order details, except as stated in the Terms of Use.

Security of Your Personal Information

Crowdo ensures that all information collected will be safely and securely stored. We protect your personal information by:

- Restricting access to personal information
- Maintaining technology products to prevent unauthorized computer access
- Crowdo uses SSL (secure sockets layer) encryption technology when processing your financial details. SSL encryption is approximated to take at least one trillion years to break, and is the industry standard.

If you believe that your privacy has been breached by Crowdo, please contact us at our e-mail address below.

Your password is the key to your account. Please use unique numbers, letters and special characters, and do not share your Crowdo password to anyone. If you do share your password with others, you will be responsible for all actions taken in the name of your account and the consequences. If you lose control of your password, you may lose substantial control over your personal information and other information submitted to Crowdo. You could also be subject to legally binding actions taken on your behalf. Therefore, if your password has been compromised for any reason or if you have grounds to believe that your password has been compromised, you should immediately contact us and change your password. You are reminded to log off of your account and close the browser when finished using a shared computer.

Minor

If you are under 18 years old, you are not allowed to make any transaction on the Crowdo Platform.

Collection of Computer Data

Crowdo or our authorized service providers may use cookies, web beacons, and other similar technologies for storing information to help provide you with a better, faster, safer and personalized experience when you use the Services and/or access the Platform.

When you visit Crowdo, our company servers will automatically record information that your browser sends whenever you visit a website. This data may include:

- Your computer's IP address
- Browser type
- Webpage you were visiting before you came to our Platform
- The pages within the Platform which you visit
- The time spent on those pages, items and information searched for on the Platform, access times and dates, and other statistics.

This information is collected for analysis and evaluation in order to help us improve our website and the services and products we provide.

Cookies are small text files (typically made up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. They allow us to recognize a particular device or browser and help us to personalize the content to match your preferred interests more quickly, and to make our Services and Platform more convenient and useful to you.

Web beacons are small graphic images that may be included on our Service and the Platform. They allow us to count users who have viewed these pages so that we can better understand your preference and interests.

No Spam, Spyware, or Virus

Spam, spyware or virus is not allowed on Platform. Please set and maintain your communication preferences so that we send communications to you as you prefer. You are not licensed or otherwise allowed to add other users (even a user who has purchased an item from you) to your mailing list (email or physical mail) without their express consent. You should not send any messages which contain spam, spyware or virus via the Platform. If you would like to report any suspicious messages, please contact us at our email address below.

Changes to the Privacy Policy

Crowdo shall regularly review the sufficiency of this Privacy Policy. We reserve the right to modify and change the Privacy Policy at any time. Any changes to this policy will be published on the Platform.

Crowdo's Right

YOU ACKNOWLEDGE AND AGREE THAT CROWDO HAS THE RIGHT TO DISCLOSE YOUR PERSONAL INFORMATION TO ANY LEGAL, REGULATORY, GOVERNMENTAL, TAX, LAW ENFORCEMENT OR OTHER AUTHORITIES OR THE RELEVANT RIGHT OWNERS, IF CROWDO HAS REASONABLE GROUNDS TO BELIEVE THAT DISCLOSURE OF YOUR PERSONAL INFORMATION IS NECESSARY FOR THE PURPOSE OF MEETING ANY OBLIGATIONS, REQUIREMENTS OR ARRANGEMENTS, WHETHER VOLUNTARY OR MANDATORY, AS A RESULT OF COOPERATING WITH AN ORDER, AN INVESTIGATION AND/OR A REQUEST OF ANY NATURE BY SUCH PARTIES. TO THE EXTENT PERMISSIBLE BY APPLICABLE LAW, YOU AGREE NOT TO TAKE ANY ACTION AND/OR WAIVE YOUR RIGHTS TO TAKE ANY ACTION AGAINST CROWDO FOR THE DISCLOSURE OF YOUR PERSONAL INFORMATION IN THESE CIRCUMSTANCES.

Contacting Crowdo

If you wish to withdraw your consent to our use of your personal information, request access and/or correction of your personal information, have any queries, comments or concerns, or require any help on technical matters, please feel free to contact us at enquiry@crowdo.com.

Last updated February 22nd, 2016

PRIVACY NOTICE

At Crowdo (“we”, “us”, or “our”), we value your privacy and strive to protect your personal data in compliance with the laws of Malaysia. Crowdo will only collect, process use and disclose your personal data in accordance with the applicable laws in Malaysia (including the Personal Data Protection Act 2010 and Personal Data Protection Regulations 2013), this Privacy Notice and privacy terms in your agreement(s) with Crowdo you may have contracted with.

This Privacy Notice explains:

- The type/ description of personal data we collect and how we collect it
- How we process and use your personal data
- The parties that we disclose the personal data to
- The choices we offer, including how we access and update your personal data

For the purposes of this Privacy Notice, please note that:

- “Crowdo” refers to Crowdo Malaysia Sdn Bhd its related companies (as defined in Section 6 of the Companies Act 1965), affiliates and its third party agents.
- “Personal data” refers to any data which relates directly or indirectly to you and/or your transactions with us. This data includes your name, address, occupation, contact details, the details of your account(s), the type of products and/or services subscribed to and such other necessary data regarding yourself and your transaction(s) with us.
- “Process” refers to collection, recording, holding or storing your personal data or carrying out any operation or set of operations on the personal data in regard to a commercial transaction.

By submitting your own or another individual’s personal data, you confirm that you and such other individual agree to our processing of personal data in accordance with this Privacy Notice and you are responsible to provide accurate, complete and up-to-date information to us. Please do not send us any personal data if you do not want it to be processed in this way.

1. Type/ description of personal data collected, and how this data is collected

In order to enable us to deal with your inquiries, to manage your membership with us and/or to generally provide you with our products and services, we may need to and/or may be required to process personal data about you, including but not limited to:

- a. personal information to establish your identity and background. This includes name, address, gender, age, date of birth and password;
- b. financial information to establish your financial standing and/ or suitability for any of our products/services applied for (if required). This includes the details of your account(s) and other information about your financial situation;
- c. personal information that you provide when you apply for any of our products and services; and/ or
- d. information relating to any businesses or companies in which you may be involved or which you may have an interest;

- e. information relating to any legal proceedings, commission or alleged commission of an offence in which you may be directly or indirectly involved in; and/or
- f. from public register or public domain such as internet.

By agreeing to this Privacy Notice, you agree that the abovementioned third parties are authorised to give us personal data about you for any of the purposes listed in this Privacy Notice or for any other lawful purpose.

2. How your Personal Data is used

Other than as stated above, we may use your personal data for purposes in relation to our businesses and the purposes include the following:

- a. to assess your application(s)/request(s)/eligibility/suitability for our products and services and for your participation in this equity crowdfunding platform operated by us;
- b. to ascertain and/or verify that any data provided by you is correct (including by communication with third parties and checking databases);
- c. to verify your financial standing;
- d. to meet our contractual obligations;
- e. to manage and maintain your account(s), facility(ies) and membership with us;
- f. for any due diligence conducted in accordance with the law or in relation to any potential corporate exercise/ transaction;
- g. to better manage our business and your relationship with us;
- h. to better understand your current and future investment needs and your financial situation;
- i. to provide you with information on our and third party products, services and offers which may be of interest to you;
- j. to improve our products and services and to develop new products and services;
- k. to notify you about benefits and changes to the features of the products and services;
- l. to administer offers, competitions and promotions;
- m. to respond your enquiries and complaints and to generally resolve disputes;
- n. to update, consolidate and improve the accuracy of our records;
- o. to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- p. to conduct research for analytical purposes but not limited to data mining and analysis of your transactions with us;
- q. to meet the disclosure requirements of any law binding on Crowdo;
- r. for audit, compliance and risk management purposes;
- s. to assess financial risks;

PRIVACY NOTICE

At Crowdo (“we”, “us”, or “our”), we value your privacy and strive to protect your personal data in compliance with the data protection laws of Singapore. Crowdo will only collect, process use and disclose your personal data in accordance with the requirements of Singapore’s Personal Data Protection Act 2012 (“PDPA”) and any subsidiary legislation promulgated thereunder, this Privacy Notice and privacy terms in any agreement(s) which you may have entered into with Crowdo from time to time.

This Privacy Notice explains:

- The type/ description of personal data we collect and how we collect it
- How we process and use your personal data
- The parties that we disclose the personal data to
- The choices we offer, including how we access and update your personal data

For the purposes of this Privacy Notice, please note that:

- “Crowdo” refers to Crowdonomic Media Pte. Ltd., its related companies (as defined in Section 6 of the Singapore Companies Act (Cap. 50)), affiliates and its third party agents.
- “Personal data” refers to 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 the organisation has or is likely to have access. This data will include your name, address, occupation, contact details, the details of your account(s), the type of products and/or services subscribed to and such other necessary data regarding yourself and your transaction(s) with us.
- “Process”, in relation to personal data, means the carrying out of any operation or set of operations in relation to the personal data, and includes any of the following: (a) recording; (b) holding; (c) organisation, adaptation or alteration; (d) retrieval; (e) combination; (f) transmission; (g) erasure or destruction.

By submitting your own or another individual’s personal data, you confirm that you and such other individual agree and consent to our collecting, using, disclosing and/or processing of personal data in accordance with this Privacy Notice and (where applicable) such other privacy terms as may contained in any agreement(s) which you may have entered into with Crowdo from time to time, and that you shall provide us with accurate, complete and up-to-date personal data to us for such purposes. Please do not send us any personal data if you do not want such personal data to be processed in this way.

1. Type/ description of personal data collected, and how this data is collected

In order to enable us to deal with your inquiries, to manage your membership with us and/or to generally provide you with our products and services (regardless of whether you are a private individual or whether you are an employee or corporate representative acting on behalf of an institution), we may need to and/or may be required to collect, use, disclose and/or process personal data about you, including but not limited to the following types of information:

- a. personal data to establish your identity and background. This includes your name, address, gender, age, date of birth and password;

- b. financial information to establish your financial standing (and/or the financial standing of the institution, as may be applicable) and/ or suitability for any of our products/services applied for (if required). This includes the details of your account(s) and other information about your financial situation (and/or details of the financial situation of the institution, as may be applicable);
- c. personal data that you provide when you apply for any of our products and services; and/or
- d. information relating to any businesses or companies in which you may be involved or which you may have an interest (and/or information relating to any business or companies in which the institution may be involved in or which the institution may have an interest, as may be applicable);
- e. information relating to any legal proceedings, commission or alleged commission of an offence in which you (and/or the institution) may be directly or indirectly involved in; and/or
- f. any personal data which may be available on a public register or public domain such as the internet.

2. How your Personal Data is collected, used and disclosed

Other than as stated above, we may collect, use and disclose your personal data in order to process the products and services applied for by you and for purposes in relation to our businesses. These purposes include the following:

- a. to assess your application(s)/request(s)/eligibility/suitability for our products and services and for your participation in this securities crowdfunding platform operated by us, including conducting know-your-client checks and other background and due diligence checks;
- b. to ascertain and/or verify that any data provided by you is correct (including by communicating with third parties and checking databases);
- c. to verify your financial standing;
- d. to meet our contractual obligations;
- e. to manage and maintain your account(s), facility(ies) and membership with us;
- f. for any due diligence conducted in accordance with the law or in relation to any potential corporate exercise/ transaction;
- g. to better manage our business and your relationship with us;
- h. to send updates and administrative notices to you in relation to the products and services used by you;
- i. to better understand your current and future investment needs and your financial situation;
- j. where permitted under the PDPA, to provide you with information on our and third party products, services and offers which may be of interest to you];
- k. to improve our products and services and to develop new products and services;

- l. to notify you about benefits and changes to the features of the products and services;
- m. to administer offers, competitions and promotions;
- n. to respond your enquiries and complaints and to generally resolve disputes;
- o. to update, consolidate and improve the accuracy of our records;
- p. to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- q. to conduct research for analytical purposes but not limited to data mining and analysis of your transactions with us in order to improve the products and services which we are providing to you;
- r. to meet the disclosure requirements of any law binding on Crowdo;
- s. for audit, compliance and risk management purposes;
- t. to assess financial risks;
- u. to transfer or assign our rights, interests and obligations under and of your agreements with us;
- v. to protect or enforce our rights to recover any debt owing to us;
- w. to conduct investigations and proceedings including anti-money laundering checks for the purposes of compliance with anti-money laundering rules (including the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001); for crime detection; prevention and prosecution; to comply with any sanction requirements;
- x. facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving us;
- y. where we are required to meet our obligations to any relevant regulatory authority (whether in or outside Singapore);
- z. for any other purpose that is required or permitted by any law, guidelines and/or relevant regulatory authorities; and/or
any other purpose reasonably related to the foregoing.

3. Disclosure of your Personal Data

Subject to the provisions of any applicable law, your personal data and/or information about your accounts and/or facilities may be provided, for the purposes set out in this Privacy Notice (where applicable) and (where applicable) such other privacy terms as may contained in any agreement(s) which you may have entered into with Crowdo from time to time, to the following entities or parties, whether they are located overseas or in Singapore:

- a. our related corporations;
- b. companies and/or organizations that act as our agents, affiliates and/or professional advisors;

- c. companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions that you have requested, including but not limited to trust companies, escrow agent or payment gateway service providers;
- d. agents, contractors or third party service providers who provide operational services to us, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival or other services;
- e. companies and/or organizations that assist us in providing value-added services that you may have requested;
- f. brokerage houses, Central Depository (Pte) Limited, fund houses, registrars, custodians, nominee banks, external banks and investment vehicles in relation to investment product settlement processing;
- g. any swap repository, trade data repository, reporting agent, clearing house, centralised clearing party (including any clearing member of such clearing house or centralised clearing party), clearing broker, multilateral or other trading facility, system or platform or such other communication network or auction facility;
- h. credit bureaus, debt collection agencies, credit reporting and credit rating agencies, and other risk assessment and risk rating companies;
- i. your advisors (including but not limited to accountants, auditors, financial advisers, or other professional advisors) where authorized by you;
- j. any other person notified by you as authorized to give instructions or to use the account(s)/facility(ies) or products or services on your behalf;
- k. any person intending to settle any moneys outstanding under the facility(ies) granted by us to you;
- l. any person connected to the enforcement or preservation of any of our rights under your agreement(s) with us;
- m. relevant government regulators, government ministries, statutory boards or authorities and/or law enforcement agencies, whether local or overseas, including the Monetary Authority of Singapore, the Accounting and Corporate Regulatory Authority, and the Insolvency and Public Trustee Office, to comply with any directions, laws, rules, guidelines, regulations or schemes issued or administered by any of them, as well as to comply with listing and other requirements or directions of Singapore Exchange Limited and/or any other relevant securities exchange; and/or
- n. any other party to whom you authorise us to disclose your personal data.

Additionally, where permitted under the PDPA, Crowdo's partners may contact you about products, services and offers, which may be of interest to you or benefit you financially. However, please note that we will only disclose your personal data (which will not include information relating to your affairs or accounts) to our partners where your express prior consent has been

obtained and subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to Crowdo (whether inside or outside of Singapore).

You may tell us at any time if you do not wish to receive marketing communications from us and partners by notifying us at the address/email address given at the end of this Privacy Notice. Your latest written instructions to us will prevail. Please take note that certain communications such as statements of account and our websites contain standard information regarding our other products and services that cannot be removed without affecting delivery/ provision of our services and/or products, the operation of your account(s) and/or facility(ies) with us, and/or additional costs to you.

We will otherwise treat your personal data as private and confidential and will not disclose your personal data to anyone outside Crowdo except as otherwise notified to you in this Privacy Notice and (where applicable) such other privacy terms as may contained in any agreement(s) which you may have entered into with Crowdo from time to time.

4. Retention of Personal Data

- a. Personal data will be held for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by the applicable laws. We will retain the records relevant to your membership and any activity you conduct on the Platform for a minimum period of 5 years. This period may be extended or reduced by force of law or regulatory requirement, although personal data records will be retained by us only in accordance with law.
- b. In the event of the cessation of business, we shall cease to retain personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal data was collected is no longer being served by the retention of the personal data and the retention is no longer necessary for legal or business purposes.

5. Incomplete submission of Personal Data

Where indicated by us as such, it is necessary to provide your personal data to us to enable us to process your application for our products or services. Should you decline to provide such obligatory personal data, we may not be able to process your application/request or provide you with our products or services.

6. Your rights to access and correct your Personal Data

We can assist you to access and correct your personal data held by us.

Where you wish to have access to your personal data in Crowdo's possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or not up-to-date, you may access to your registered data online in the Profile section of our website.

Please note that Crowdo may have to withhold access to your personal data in certain situations, for example when we are unable to confirm your identity or where data requested for is of a confidential commercial nature or where the request for personal data cannot be met due to restrictions or prohibitions under the PDPA or other applicable law.

Please also note that Crowdo may use its discretion in allowing the corrections requested and/or require further documentary evidence of the new data to avoid fraud and inaccuracy.

7. Exercising choices over the disclosure and use of your Personal Data

Subject always to our contractual rights and obligations under relevant laws and regulations, you may exercise your choice in respect to the disclosure and use of your personal data. Should you

wish to do so, kindly contact us at the address/telephone number/email address given at the end of this Privacy Notice.

8. Cookies

Crowdo may from time to time set up cookies on your computer, and may access to those cookies. Cookies can be disabled and enabled in your web browser.

Any information so collected by Crowdo will be non-personal and anonymous and such information is obtained solely to understand your use of our website.

9. Revisions to Privacy Notice

This Privacy Notice may be revised from time to time. Notice of any such revision will be provided by posting updates on Crowdo's website and/or by such other means of communication deemed suitable by Crowdo.

The terms in this English version of Privacy Notice shall prevail in the event of conflict(s) with any translated versions of the Privacy Notice.

10. Contacting Crowdo

Should you have any query in relation to this Privacy Notice or how we handle your personal data, kindly contact us below:

Email: Enquiry@crowdo.com

Attention: Crowdo Singapore Officer

Last updated on November 14th, 2016

For SGD / USD P2P / Equity Crowdfunding Users

PRIVACY NOTICE

At Crowdo (“we”, “us”, or “our”), we value your privacy and strive to protect your personal data in compliance with the data protection laws of Singapore. Crowdo will only collect, process use and disclose your personal data in accordance with the requirements of Singapore’s Personal Data Protection Act 2012 (“PDPA”) and any subsidiary legislation promulgated thereunder, this Privacy Notice and privacy terms in any agreement(s) which you may have entered into with Crowdo from time to time.

This Privacy Notice explains:

- The type/ description of personal data we collect and how we collect it
- How we process and use your personal data
- The parties that we disclose the personal data to
- The choices we offer, including how we access and update your personal data

For the purposes of this Privacy Notice, please note that:

- “Crowdo” refers to Crowdonomic Media Pte. Ltd., its related companies (as defined in Section 6 of the Singapore Companies Act (Cap. 50)), affiliates and its third party agents.
- “Personal data” refers to 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 the organisation has or is likely to have access. This data will include your name, address, occupation, contact details, the details of your account(s), the type of products and/or services subscribed to and such other necessary data regarding yourself and your transaction(s) with us.
- “Process”, in relation to personal data, means the carrying out of any operation or set of operations in relation to the personal data, and includes any of the following: (a) recording; (b) holding; (c) organisation, adaptation or alteration; (d) retrieval; (e) combination; (f) transmission; (g) erasure or destruction.

By submitting your own or another individual’s personal data, you confirm that you and such other individual agree and consent to our collecting, using, disclosing and/or processing of personal data in accordance with this Privacy Notice and (where applicable) such other privacy terms as may contained in any agreement(s) which you may have entered into with Crowdo from time to time, and that you shall provide us with accurate, complete and up-to-date personal data to us for such purposes. Please do not send us any personal data if you do not want such personal data to be processed in this way.

1. Type/ description of personal data collected, and how this data is collected

In order to enable us to deal with your inquiries, to manage your membership with us and/or to generally provide you with our products and services (regardless of whether you are a private individual or whether you are an employee or corporate representative acting on behalf of an institution), we may need to and/or may be required to collect, use, disclose and/or process personal data about you, including but not limited to the following types of information:

- a. personal data to establish your identity and background. This includes your name, address, gender, age, date of birth and password;

- b. financial information to establish your financial standing (and/or the financial standing of the institution, as may be applicable) and/ or suitability for any of our products/services applied for (if required). This includes the details of your account(s) and other information about your financial situation (and/or details of the financial situation of the institution, as may be applicable);
- c. personal data that you provide when you apply for any of our products and services; and/or
- d. information relating to any businesses or companies in which you may be involved or which you may have an interest (and/or information relating to any business or companies in which the institution may be involved in or which the institution may have an interest, as may be applicable);
- e. information relating to any legal proceedings, commission or alleged commission of an offence in which you (and/or the institution) may be directly or indirectly involved in; and/or
- f. any personal data which may be available on a public register or public domain such as the internet.

2. How your Personal Data is collected, used and disclosed

Other than as stated above, we may collect, use and disclose your personal data in order to process the products and services applied for by you and for purposes in relation to our businesses. These purposes include the following:

- a. to assess your application(s)/request(s)/eligibility/suitability for our products and services and for your participation in this securities crowdfunding platform operated by us, including conducting know-your-client checks and other background and due diligence checks;
- b. to ascertain and/or verify that any data provided by you is correct (including by communicating with third parties and checking databases);
- c. to verify your financial standing;
- d. to meet our contractual obligations;
- e. to manage and maintain your account(s), facility(ies) and membership with us;
- f. for any due diligence conducted in accordance with the law or in relation to any potential corporate exercise/ transaction;
- g. to better manage our business and your relationship with us;
- h. to send updates and administrative notices to you in relation to the products and services used by you;
- i. to better understand your current and future investment needs and your financial situation;
- j. where permitted under the PDPA, to provide you with information on our and third party products, services and offers which may be of interest to you];
- k. to improve our products and services and to develop new products and services;

For MYR Equity Crowdfunding Users

PRIVACY NOTICE

At Crowdo (“we”, “us”, or “our”), we value your privacy and strive to protect your personal data in compliance with the laws of Malaysia. Crowdo will only collect, process use and disclose your personal data in accordance with the applicable laws in Malaysia (including the Personal Data Protection Act 2010 and Personal Data Protection Regulations 2013), this Privacy Notice and privacy terms in your agreement(s) with Crowdo you may have contracted with.

This Privacy Notice explains:

- The type/ description of personal data we collect and how we collect it
- How we process and use your personal data
- The parties that we disclose the personal data to
- The choices we offer, including how we access and update your personal data

For the purposes of this Privacy Notice, please note that:

- “Crowdo” refers to Crowdo Malaysia Sdn Bhd its related companies (as defined in Section 6 of the Companies Act 1965), affiliates and its third party agents.
- “Personal data” refers to any data which relates directly or indirectly to you and/or your transactions with us. This data includes your name, address, occupation, contact details, the details of your account(s), the type of products and/or services subscribed to and such other necessary data regarding yourself and your transaction(s) with us.
- “Process” refers to collection, recording, holding or storing your personal data or carrying out any operation or set of operations on the personal data in regard to a commercial transaction.

By submitting your own or another individual’s personal data, you confirm that you and such other individual agree to our processing of personal data in accordance with this Privacy Notice and you are responsible to provide accurate, complete and up-to-date information to us. Please do not send us any personal data if you do not want it to be processed in this way.

1. Type/ description of personal data collected, and how this data is collected

In order to enable us to deal with your inquiries, to manage your membership with us and/or to generally provide you with our products and services, we may need to and/or may be required to process personal data about you, including but not limited to:

- a. personal information to establish your identity and background. This includes name, address, gender, age, date of birth and password;
- b. financial information to establish your financial standing and/ or suitability for any of our products/services applied for (if required). This includes the details of your account(s) and other information about your financial situation;
- c. personal information that you provide when you apply for any of our products and services; and/or
- d. information relating to any businesses or companies in which you may be involved or which you may have an interest;

- e. information relating to any legal proceedings, commission or alleged commission of an offence in which you may be directly or indirectly involved in; and/or
- f. from public register or public domain such as internet.

By agreeing to this Privacy Notice, you agree that the abovementioned third parties are authorised to give us personal data about you for any of the purposes listed in this Privacy Notice or for any other lawful purpose.

2. How your Personal Data is used

Other than as stated above, we may use your personal data for purposes in relation to our businesses and the purposes include the following:

- a. to assess your application(s)/request(s)/eligibility/suitability for our products and services and for your participation in this equity crowdfunding platform operated by us;
- b. to ascertain and/or verify that any data provided by you is correct (including by communication with third parties and checking databases);
- c. to verify your financial standing;
- d. to meet our contractual obligations;
- e. to manage and maintain your account(s), facility(ies) and membership with us;
- f. for any due diligence conducted in accordance with the law or in relation to any potential corporate exercise/ transaction;
- g. to better manage our business and your relationship with us;
- h. to better understand your current and future investment needs and your financial situation;
- i. to provide you with information on our and third party products, services and offers which may be of interest to you;
- j. to improve our products and services and to develop new products and services;
- k. to notify you about benefits and changes to the features of the products and services;
- l. to administer offers, competitions and promotions;
- m. to respond your enquiries and complaints and to generally resolve disputes;
- n. to update, consolidate and improve the accuracy of our records;
- o. to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- p. to conduct research for analytical purposes but not limited to data mining and analysis of your transactions with us;
- q. to meet the disclosure requirements of any law binding on Crowdo;
- r. for audit, compliance and risk management purposes;
- s. to assess financial risks;

- t. to transfer or assign our rights, interests and obligations under and of your agreements with us;
- u. to protect or enforce our rights to recover any debt owing to us;
- v. to conduct anti-money laundering checks for the purposes of compliance with anti-money laundering rules (including the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001); for crime detection; prevention and prosecution; to comply with any sanction requirements; and/or
- w. for any other purpose that is required or permitted by any law, guidelines and/or relevant regulatory authorities.

3. Disclosure of your Personal Data

As a part of providing you with our products and services and the management and/or operation of the same, we may be required or need to disclose personal data about you and/or your accounts and/or facilities with us to the following third parties:

- a. companies and/or organizations that act as our agents, affiliates and/pro professional advisors;
- b. companies and/or organizations that assist us in processing and/or otherwise fulfilling transactions that you have requested, including but not limited to trust companies, escrow agent or payment gateway service providers;
- c. companies and/or organizations that assist us in providing value added services that you may have requested;
- d. your advisors (including but not limited to accountants, auditors, financial advisers, or other professional advisors) where authorized by you;
- e. any other person notified by you as authorized to give instructions or to use the account(s)/facility(ies) or products or services on your behalf;
- f. any person intending to settle any moneys outstanding under the facility(ies) granted by us to you;
- g. any person connected to the enforcement or preservation of any of our rights under your agreement(s) with us; and/or
- h. the Securities Commission Malaysia,

subject to all times to any laws (including regulations, guidelines and/or obligations) applicable to Crowdo (whether inside or outside of Malaysia). The afore-mentioned third parties may in some instances be located outside of Malaysia. If our data processing is carried out by a third party, we will require the third party to adhere to our standards.

Additionally, Crowdo's partners may contact you about products, services and offers, which may be of interest to you or benefit you financially. However, please note that we will only disclose your personal data (which will not include information relating to your affairs or accounts) to our partners where your express prior consent has been obtained and subject at all times to any laws (including regulations, guidelines and/or obligations) applicable to Crowdo (whether inside or outside of Malaysia).

You may tell us at any time if you do not wish to receive marketing communications from us and partners by notifying us at the address/telephone number/email address given at the end of this Privacy Notice. Your latest written instructions to us will prevail. Please take note that certain communications such as statements of account and our websites contain standard information regarding our other products and services that cannot be removed without affecting delivery/provision of our services and/or products, the operation of your account(s) and/or facility(ies) with us, and/or additional costs to you.

We will otherwise treat your personal data as private and confidential and will not disclose your personal data to anyone outside Crowdo except:

- a. where you have given permission;
- b. where we are required or permitted to do so by law;
- c. where required or authorized by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over Crowdo for the purposes of complying with any legal requirement or in connection with actual or threatened legal proceedings;
- d. where we may transfer rights and obligations pursuant to our agreement(s) with you;
- e. where we are required to meet our obligations to any relevant regulatory authority (whether in or outside Malaysia);
- f. where the source of the information is publicly available;
- g. where the disclosure or use of the personal data is for one of the purposes in connection with which the information was obtained or is directly related to those purposes;
- h. where the disclosure is to third party service providers to enable them to supply their services to us. Third party service providers include but not limited to trust companies, escrow agent or payment gateway service providers; and
- i. where disclosure or use is required for any potential corporate exercise/ transaction.

4. Security of your Personal Data

Personal Data is our asset and therefore Crowdo places great importance on ensuring the security of your personal data. We regularly review and implement up to date technical and organizational security measures when processing your personal data.

In processing your personal data, we will take practical and reasonable steps to protect the personal data from any loss, misuse, modification, unauthorized or accidental disclosure, alteration or destruction.

5. Retention of your Personal Data

Crowdo will retain your personal data in compliance with the applicable laws of Malaysia (including Personal Data Protection Act 2010 and Personal Data Protection Regulations 2013 including their revisions), this Privacy Notice and the terms and conditions of your agreement(s) with Crowdo for the duration of your relationship with us, for such period as may be necessary for the fulfilment of its purpose and/or for the purpose of protecting the interests of Crowdo and/or its customers as may be

deemed necessary, where otherwise required by the law and/or where required by Crowdo's relevant policies.

When your personal data is no longer needed, we will take all reasonable steps to ensure that all the personal data is destroyed or deleted.

6. Incomplete submission of Personal Data

Where indicated, it is obligatory to provide your personal data to us to enable us to process your application for our products or services. Should you decline to provide such obligatory personal data, we may not be able to process your application/request or provide you with our products or services.

7. Your rights to access and correct your Personal Data

We can assist you to access and correct your personal data held by us.

Where you wish to have access to your personal data in Crowdo's possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or not up-to-date, you may access to your registered data online in the Profile section of our website.

Please note that Crowdo may have to withhold access to your personal data in certain situations, for example when we are unable to confirm your identity or where data requested for is of a confidential commercial nature or in the event we receive repeated requests for the same data.

Please also note that Crowdo may use its discretion in allowing the corrections requested and/or require further documentary evidence of the new data to avoid fraud and inaccuracy.

8. Exercising choices over the disclosure, retention and use of your Personal Data

Subject always to our contractual rights and obligations under relevant laws and regulations, you may exercise your choice in respect to the disclosure, retention and use of your personal data. Should you wish to do so, kindly contact us at the address/telephone number/email address given at the end of this Privacy Notice.

9. Cookies

Crowdo may from time to time set up cookies on your computer, and may access to those cookies. Cookies can be disabled and enabled in your web browser.

Any information so collected by Crowdo will be non-personal and anonymous and such information is obtained solely to understand your use of our website.

10. Opt-out

If you do not want us to continue to use your personal data as described above, kindly contact us at the telephone number/email address given at the end of this Privacy Notice or unsubscribe the membership with us.

By not informing us or unsubscribing, we will assume we have your implied consent to process your personal data as described above.

11. Revisions to Privacy Notice

This Privacy Notice may be revised from time to time. Notice of any such revision will be given on Crowdo's website and/or by such other means of communication deemed suitable by Crowdo.

The terms in this English version of Privacy Notice shall prevail in the event of conflict(s) with the corresponding Bahasa Malaysia version of Privacy Notice.

12. Contacting Crowdo

Should you have any query in relation to this Privacy Notice or how we handle your personal data, kindly contact us below:

Email: enquiry@crowdo.com

Attention: Crowdo Malaysia Officer

Last updated on December 9th, 2015