

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