

Data Privacy Policy

1. Introduction

Currenxie Limited, together with its subsidiaries (“Currenxie”, “CX”, “we” or “us”), developed this privacy policy (“Privacy Policy”) to explain how we may collect, use, store, access, and disclose your Personal Information (as defined below) when you use Currenxie’s Services. We treat your information privacy very seriously and are committed to protecting the Personal Information you provide to us in accordance with this Privacy Policy.

The term “Personal Information” in this Privacy Policy refers to personal data as defined under the Personal Data (Privacy) Ordinance (Cap. 486) of the Hong Kong Special Administrative Region, which means any data relating directly or indirectly to a living individual from which it is practicable for the identity of the individual to be directly or indirectly ascertained, in a form in which access to or processing of that data is practicable. For purposes of the Services, Personal Information may include, but is not limited to, your personal details, job particulars, income and financial details.

2. Purpose

Currenxie will collect your Personal Information only for the purpose of, and in connection with, providing the Services to you. Currenxie may also use your Personal Information in compiling aggregate statistics and data on our customers as a whole, for the purpose of managing and improving our Services to you as well as our Services generally. In the event that Currenxie wishes to use your Personal Information for any other purpose, Currenxie will notify you of such intent and obtain your consent before doing so, unless such new purpose is required by Applicable Laws.

3. Collection of Personal Information

- a. When registering or creating an account using the Currenxie platform, Currenxie collects your name, phone number, and such other information as Currenxie may deem necessary in order to identify you, maintain the security of the Currenxie application, and verify and control access to your account or online profile. If you make inquiries through the e-mail links, forms or other contact methods provided on Currenxie’s website or application, we may retain the information included in these inquiries and maintain records of the correspondences so as to properly respond to your inquiries.
- b. In order for us to provide the Services to you, Currenxie may collect from you and hold some or all of the following information about you and/or your recipient(s): (i) name; (ii) gender; (iii) photograph; (iv) address; (v) telephone number; (vi) mobile number; (vii) email address; (viii) date of birth; (ix) information for the verification of identity, including identification document type and identification number; (x) bank account information; and (xi) additional information that may be required for identity/account authentication.

- c.** You acknowledge and agree that, where Personal Information relating to other individuals is disclosed to Currenxie by you, you have provided a copy of this Privacy Policy to such individuals prior to your disclosure of their Personal Information to Currenxie, and you have obtained all relevant consents from such individuals for the use of their Personal Information in the manner as described in this Privacy Policy. You further represent and warrant that you have complied with the requirements of all Applicable Laws with respect to such Personal Information and its use by us for the purposes set out herein.
- d.** Currenxie and our marketing partners, or analytics or service providers, use technologies such as cookies, beacons, tags, and scripts, to analyze trends, administer and track users' movements around websites and applications, and gather demographic information about Currenxie's user base as a whole, with respect to the following purposes:

 - i.** To assist Currenxie in providing Services to you;
 - ii.** To store your preferences and other information and to track activity on the Currenxie application;
 - iii.** To better understand the effectiveness of Currenxie's promotional campaigns;
 - iv.** To deliver information specific to your interests on additional web sites.
- d.** Currenxie may receive individual as well as aggregated customer reports based on the use of these technologies by these partners or service providers.

NOTE: A "cookie" is a text file placed on your storage devices by a connected application, which allows for personalization of certain aspects of your visit to a connected service. "Web beacons" are transparent electronic images placed in code that collect non-personal data while visiting a website. Cookies and web beacons can usually be disabled by changing your browser preferences. Your browser usually has documentation on how to disable cookies and web beacons. Note that disabling cookies may limit the performance and functionality of Currenxie's applications, and you may not be able to register or use your account.

4. Third Parties

Currenxie may partner with a third party to either display advertising in the Currenxie application or on the Currenxie website, or to manage Currenxie's advertising on other sites. Currenxie's third party partner may use technologies such as cookies to gather information about your activities while using the application or website and other sites in order to provide you advertising based on your browsing activities and interests. In addition, Currenxie automatically gathers and stores in log files certain information, such as Internet Protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. Currenxie does not link this automatically collected data to other information we collect about you. Currenxie as well as our third party partners may use local storage to store content information and preferences. By using our application or website, you consent to the collection and use of your information as

described in this Clause 3. If you do not wish to have your information collected and used in this manner, you must not use the Currenxie applications or websites.

5. Use of Personal Information

- a.** Currenxie may from time to time, use your Personal Information to send you information that is relevant to our Services. If, at any time, you do not wish to receive that information, you may opt-out by notifying us at operations@currenxie.com that you do not wish to be included in any future mail-outs.

- b.** Your Personal Information held by us may be used for the following purposes:
 - i.** Processing your request for our Services;
 - ii.** Management, operation, audit, and maintenance of the Services, and exercising our and your rights under the Customer Agreement;
 - iii.** Collecting money due from you;
 - iv.** Designing new, or improving existing, Services provided by us;
 - v.** Communication between you and us;
 - vi.** Investigation of complaints, suspicious activities, and failed transactions;
 - vii.** Prevention or detection of crime;
 - viii.** Disclosure as required by Applicable Laws.

6. Disclosure of Personal Information

- a.** We will safeguard your Personal Information collected by us in accordance with Clause 9 below. Subject to our obligations therein, we may, for the purpose(s) set out in Clauses 2 and 3 above, transfer or disclose such Personal Information to the following parties:
 - i.** Our partner banks and financial services companies;
 - ii.** Our agents or contractors under a duty of confidentiality to us who provide administrative, telecommunications, computer, payment, data processing, professional advisory, or other services to us in connection with the operation of our business;
 - iii.** Our affiliates which owe a duty of confidentiality to us;
 - iv.** Any law enforcement agencies, judicial authorities, regulatory bodies and/or any person or entity to whom we have an obligation under Applicable Laws to disclose, but such disclosure will only be made under proper authority.

- b.** In addition, Currenxie may disclose your Personal Information to third parties for the following purposes:
- i.** To protect our property, Services, and legal rights (including but not limited to debt collection);
 - ii.** To support our audit, compliance, and corporate governance functions, including but not limited to compliance with Applicable Laws;
 - iii.** To detect risks, prevent fraud, or assess suspicious activities;
 - iv.** To investigate violations of the Terms;
 - v.** To manage credit reporting;
 - vi.** To facilitate a purchase or sale of all or part our business or assets;
 - vii.** In connection with a merger or acquisition involving Currenxie;
 - viii.** In accordance with obligations imposed on Currenxie by our third party service providers with respect to the provision of Services.
- c.** Our network infrastructure involves computers, cloud-based servers, and third party service providers in multiple jurisdictions. The Personal Information that Currenxie collects from you may be transferred to, and stored at, a destination outside of Hong Kong. It may also be processed by persons operating outside of Hong Kong on behalf of Currenxie, our affiliate(s), or one of our service providers, providing Transaction processing, payment detail verification, as well as other Services-related support. Currenxie will take commercially reasonable steps to ensure that such Personal Information is treated securely and in accordance with this Privacy Policy within and outside of Hong Kong. However, we do not represent that our Services are appropriate or available in any particular jurisdiction. By using the Services or submitting your Personal Information, you consent to your Personal Information being transferred to, stored in, and processed in, a jurisdiction outside of Hong Kong, including jurisdictions that have different data protection rules than your home country.

7. Limiting Collection and Retention of Information

- a.** The amount and type of information collected by Currenxie will be limited to that which is necessary to provide Currenxie's Services and the information shall be retained only for as long as may be necessary for the fulfilment of the purpose for which the information is collected.
- b.** You acknowledge that Currenxie is obliged under the relevant Hong Kong legislation to retain Personal Information for at least 7 years.
- c.** Subject to any legislative requirements, Currenxie will permanently destroy, erase, or make

anonymous your Personal Information when it is no longer required to fulfil the purpose for which it has been collected.

8. Accuracy

- a.** Currenxie will make reasonable efforts to ensure that your Personal Information is sufficiently accurate, complete and up-to-date to minimise the possibility that inappropriate information may be used to make a decision about you.
- b.** Currenxie will not routinely update your Personal Information unless such a process is necessary to fulfil the purposes for which the information was collected. In accordance with the Customer Agreement, you must notify Currenxie as soon as possible if any of the information you have provided to us has changed.

9. Children's Privacy

The Currenxie website, application, and Services are not directed at or intended for use by children under the age of 18. Currenxie will not knowingly collect or maintain Personal Information from children under the age of 18. If we obtain actual knowledge that we have collected Personal Information from a child under the age of 18, we will promptly delete it, unless we are legally required to retain such information.

10. Safeguards

- a.** Currenxie has in place a range of security safeguards to protect your Personal Information held by us against loss or theft, as well as unauthorized access, disclosure, processing, copying, use, erasure, or modification, regardless of the format in which it is held.
- b.** The methods of protection Currenxie employs may depend on the sensitivity of the information and the format in which it is contained. Security measures may include all or a combination of: technological measures including SSL encryption for all data transfers over the internet, physical measures such as locked filing cabinets and restricted access to offices, and strategic measures such as security clearances and limiting access to a "need-to-know" basis.
- c.** You acknowledge that authorized employees, agents, representatives and third parties may require access to your Personal Information in order to enable Currenxie to provide the Services to you. Currenxie uses commercially reasonable efforts to ensure that our staff and third party service providers are aware of the importance of maintaining the confidentiality of Personal Information, will not keep any Personal Information for longer than is necessary, and will observe the requirements of the Customer Agreement, including this Privacy Policy. However, you acknowledge and agree that we cannot accept responsibility for any unauthorized activities on their part.

- d. You acknowledge that no data transmission over the internet or the telephone can be completely secure. Any Personal Information you submit to Currenxie either electronically or over the telephone is done at your own risk. Currenxie does not guarantee or warrant the security of information during such transmission. You acknowledge that third parties could unlawfully intercept your transmissions or may fraudulently instruct you to disclose Personal Information while posing as Currenxie representatives.
- e. You further acknowledge and agree that you are solely responsible for securing and maintaining the privacy of your password(s) and account registration information. You are also responsible for ensuring that your Personal Information held by us is accurate and current.

11. Access

- a. You have the right to request a copy of some or all of your Personal Information retained by us, if any.
- b. If you notice any inaccurate or incomplete information held by us, you have the right to ask us to correct your Personal Information. We will respond to your request within a reasonable timeframe, take appropriate action to amend the information if warranted, and/or notify any third party of the correction as necessary.
- c. You have the right to request that your personal data is erased where it is no longer necessary.
- d. Where relevant, the right to withdraw consent to processing at any time.
- e. The right to restrict processing where there is a dispute in relation to the accuracy or processing of the personal data.
- f. The right to request that Currenxie provides you with your personal data and where possible, transmit that data to another data controller.
- g. The right to object to the processing of personal data.
- h. The right not to be subject to a decision which is based solely on automated processing, including profiling which produces legal effects concerning them or similarly significant affects them.
- i. If you would like to make any request in accordance with this Clause 10, please email our Compliance Support team at cxcompliance@currenxie.com and provide us with appropriate proof of identity. You acknowledge that there may be circumstances under which Currenxie may refuse your data access request or correction request, including where the provision of access would involve unreasonable time and cost, where the information may contain

references to other individuals, where Currenxie deems, in our sole judgment, that such request was made in bad faith or for illegal purposes, or where Currenxie determines, in our sole discretion, that provision of access would negatively affect our legal, investigative, security or proprietary processes or practice.

12. Complaints

- a. Currenxie has procedures in place to receive and respond to complaints or inquiries about our policies and practices relating to the handling of Personal Information.
- b. We take all complaints seriously and will investigate each of them.
- c. We may update this Privacy Policy to reflect changes to the Services, our information practices, or Applicable Laws. The revised Privacy Policy will be effective as of the published effective date. If we make any material changes, we will publish a notice of change on the Currenxie website or in the Currenxie application prior to the change becoming effective. Currenxie encourages you to periodically review this Privacy Policy for the latest information on our privacy practices.

13. Contact

If you have any queries about this Privacy Policy, the Customer Agreement or any of our privacy practices, please contact our Data Protection Officer by email at cxcompliance@currenxie.com or by writing to us at Suite 1001, 10/F, Cambridge House, Taikoo Place, 979 King's Road, Quarry Bay, Hong Kong.