

Privacy Policy

AC Capital Market (S) Ltd

Securities Dealer licence no: SD198

Privacy Policy

At AC Capital Market (S) Ltd (“**AC Capital Market**”, “**we**”, “**us**”, “**ours**”), we respect your right to privacy. Any personal information you provide to us will be treated with the highest standards of security and confidentiality in accordance with applicable data protection and relevant privacy laws.

This document explains how we will treat the personal data we received from you for using our products and services, and govern all dealings between AC Capital Market and our customers. By opening the trading account with AC Capital Market, you expressly consent to the processing of your personal information as described in this privacy policy. We reserve the right to modify this document at any time and such amendments will come into effect upon posting on our website and other distribution channels owned by us. We recommend that you check our website or application (“Application”) periodically so that you are aware of our latest Privacy Policy. If you do not agree with any amendments made to this Privacy Policy, you may at your own discretion, notify us to terminate the relationship between you and us in a written format. You may do this by sending an email to cs@accapital.com.

1. Collection and use of personal information

To perform in compliance with relevant regulatory requirements, we have an obligation to collect information and verify the identity of our clients. Specifically, the information that we are obliged to collect and verify includes your identity, contact details, valid identification documents etc, and may also include financial info, including your credit card info, when you make a purchase from us.

When you submit the account opening form to us, you are in fact providing AC Capital Market and our affiliated entities with your personal information. Having provided personal info to us, you consent to our use, collection and disclosure of your personal info in accordance with this Privacy Policy and any other arrangements that apply between us.

Also, AC Capital Market obtains information from or about you when you use our Application or Services. The information we gather and the purposes for which we utilize, may be contingent on the Services you use and how you interact with us.

For instance, we gather the info you provide when you enter the chat rooms, participate in a contest or survey, join a reader panel or an event, register for our Application or Services, make a transaction, subscribed to our social networking functions, publications or newsletters, or send us a feedback or email. If you send material to any chat rooms, forums or our social networking functions or other community listings offered on our Application or Services, such info will be collected and some info, including your pseudonym, may be publicly available for other users to view.

You acknowledge and voluntarily give consent to us to keep records of your information, including a record of:

- Your identity (name, D.O.B., residential address);
- Contact details (correspondence address, email address, phone number);
- Other demographic information such as your occupation, approximate assets and investment experience etc.

This is not an exhaustive list of the information we need to collect in order to perform the due diligence check before we take you as a client. We may request further information from you if we believe it's necessary to do so. We may also obtain information about you from third-party providers. They are normally the credit reporting agency that we work with.

Other additional types of info that we may collect, include (but are not limited to):

- other contact details;
- details of the services and products we have provided to you or that you may have enquired for;
- any additional info relating to you that you provided to us through our Application or website or is provided to us in any other method, or indirectly through your use of our Application/ website or online presence;
- device type, device ID, geo-location info, IP address, page statistics, traffic flow, ad data, and other web log info; or
- any other personal info that may be necessary in order to deal with us.

We are obliged to keep that information confidentially for at least 7 years.

How AC Capital Market protects your privacy and data

AC Capital Market is committed to protecting your privacy while you use our Application, services and product. We will keep confidential and secure any personal information the site processes about you. We collect personal information for internal use only.

AC Capital Market takes privacy and management of information seriously. This privacy policy exists to protect you. It outlines how info of user is permitted to be used, and how it is protected.

Data Collection

AC Capital Market may collect personal info from you, or from third parties. We may collect the info when you:

- are communicating with us through the Application or websites, chats, email, other functions which you may have subscribed to or when you share info with us in other manner;
- interact with our Applications, websites, products, services, advertising, marketing and content,
- make a purchase for an AC Capital Market product or service;
- register for an AC Capital Market account or Application;
- attend any functions held by us;

Purpose

Some purposes that AC Capital Market may collect, use and disclose personal info include:

- to allow you to access and use our Application, website and services;
- to inform you of upcoming events;
- to process, protect, improve and optimise our Application, website and users' experience, such as performing analytics, conducting research for marketing and advertising;
- to send you support and administrative messages, notifications, security alerts, technical notices, updates, and info or services/ products requested by you;
- to send you info that may be of interest to you;
- to send you promotional info about our products, services and events.
- when you attend an AC Capital Market event, photography, video and other recordings may be taken and may be reproduced in AC Capital Market publications, on our media, provided to our partners and/or provided to other relevant parties;
- to administer surveys or other promotional activities or events managed or participated by AC Capital Market;
- to fulfil our legal obligations, resolve disputes if any that we may have with any of our users, and our contractual obligations with third parties;

User-generated content

User-generated content such as comments on photos, videos, articles, audio, and any info you send in public forums or chat functions, comments and feedback or testimonials you provide about our Application or Services, may be subject to our use.

By downloading, subscribing and utilizing our Application or Service, it is deemed that you have provided consent for AC Capital Market to use your info for our purposes.

Purposes of use include but are not limited to the following:

- Providing the Services
- Communicating with You or Providing Customer Service
- Editorial purposes
- Personalizing Your Experience
- Improving the Services
- AC Capital Market' Marketing and Third-Party Marketing & Advertising Purposes
- Bug monitoring and error reporting
- Security, Legal Compliance and Fraud.

Categorization of third parties to whom we may disclose the info include but are not limited to the following:

- Service Providers
- AC Capital Market' Affiliates
- Other Services and Partners at Your Request
- Events and Promotions Providers

-
- Business Partners to Provide Co-Branded Services and Products
 - Governmental or any other entities for Legal Purposes
 - Social Media Networks
 - Entities For Sales or Business transfer

AC Capital Market may, from time to time, make chat services, bulletin boards, message listings, comment columns, blogs, other forums and other such services available on or through the Application. In addition to any other regulations or rules that we may post in relation with a particular service, you agree that you shall not disseminate, upload, send or otherwise post through the Application any posts which

- restrict any other user from using the Application,
- are fraudulent, illegal, abusive, libelous, offensive, defamatory, obscene, pornographic, vulgar, profane, sexually explicit,
- give rise to civil liability or violate any local, national or international law,
- infringe or plagiarize the rights of third parties including, without limitation, copyright, trade secret, trademark, confidentiality, patent, privacy rights or any other proprietary right,
- contain a virus or other harmful component,
- contain embedded links, chain letters, advertising or any kind of pyramid schemes, or
- contain false or misleading endorsement or statements of fact.

You further agree to not impersonate any other person or entity, be it actual or fictitious, including anyone from AC Capital Market. You also may not offer to solicit any product or service on or through your posts. You alone are responsible for the contents of your posts and consequences of any of your doings.

Correction

AC Capital Market takes reasonable steps to ensure your data is accurate and up to date. If you require additional assistance in updating your personal info, you may contact AC CAPITAL MARKET' customer support service. We may also need to verify your identity when you update your personal information.

Security & Storage

AC Capital Market maintains secured data networks that are designed to safeguard the privacy and integrity of your personal info, together with comprehensive controls for data backup and to prevent unauthorized access.

Whilst AC Capital Market takes reasonable measures to safeguard personal info stored in electronic and hard copies, AC Capital Market cannot guarantee the security of your personal info. Please note that any transmission of info via the internet is never completely secure.

AC Capital Market has support, technology and other teams that are involved in the provision of the Application or website to you. They may have access to your information; however, comprehensive internal control measures are implemented to strictly limit access of your data to designated personnel.

AC Capital Market does not retain your info for longer than the period prescribed by law.

2. Collection and use of technical information

We are constantly striving to improve functionality through technology innovations. When you visit our website or use our mobile application, some technical information about you will be automatically collected and stored by us. The collected information will help us to know more about your preference and therefore provide a better user experience when you browse our website or use our products and services.

You acknowledge and voluntarily give consent to us to keep records of your info, including a record of:

- Internet protocol address, login information, browser type and version, operation system and platform etc.;
- Your visit history and the preference of your visiting info including clickstream and information you have visited or searched for etc.;
- Cookies that distinguish you from other users of our website.

Website or application usage and cookies

AC Capital Market' application or website may use third party tools such as Google Analytics to analyze how users use the application or website, which could result in collection of your personal info. The tools may use "cookies" which are text files placed on your device, to collect internet log details and behavior info in an anonymous form. The collected info (including IP address) is then used to analyze users' use of the application or website and to consolidate statistics on application or website activity for AC Capital Market. AC Capital Market will manage any personal info collected by cookies in the same way that all other personal info will be managed as described in this Privacy Policy.

Whilst most websites or applications by default automatically accept cookies, you can usually modify your settings to reject them. However, if you do reject cookies, it may disable some functionalities on our application or website.

We are obliged to keep all collected information confidential for at least 7 years.

3. Direct Marketing

We also intend to use your information (other than sensitive information) for direct marketing of our products and services. By applying for a trading account with us, you voluntarily acknowledge and provide your consent to us for direct marketing purposes. If you do not wish for the use of your data in the direct marketing campaign, you may notify us by electing the unsubscribe option in the electronic direct marketing emails. You may also send an email to cs@accapital.com if you wish to opt-out from receiving marketing and sales materials in the future.

4. Use and disclosure

We collect, hold and use your information for the following purposes:

-
- (1) providing you with products or services provided by AC Capital Market and our affiliated companies;
 - (2) assessing your account opening application and complying with legislative and regulatory obligations applied to us;
 - (3) obtain feedback from you on our services and products to help us improve our products and services quality;
 - (4) provide you with the information in relation to our products and services that you might be interested in.

We may disclose your information to our affiliated entities or service providers for the reasons mentioned above, they are:

- (1) external services providers such as credit reporting agencies, auditors etc;
- (2) our parent company and related entities;
- (3) your agents, advisers, or where you apply for our services and products through an intermediary;
- (4) other potential parties involved in markets and systems related to the products and services that we provide to you.
- (5) Regulatory authorities and governmental bodies where we are required to do so.

5. How we will handle your information

All collected information will be stored on secured servers. Where we have allocated you an access code for your trading account, you are responsible to keep the access code confidential and prevent any third party other than yourself from accessing it. AC Capital Market will take reasonable endeavor to safeguard data security and apply strict procedures to prevent unauthorized access. However, we cannot guarantee potential network security risk and any transmission during your use of our products and services is at your own risk.