

Block Tree Privacy Policy

Block Tree Ltd (hereinafter referred to as "Block Tree", "we" "us" or "our") is committed to protecting the privacy, confidentiality, and security of personal data held by Block Tree and in complying with the requirements of applicable personal data protection laws including the Personal Data Protection Act 2010 of Malaysia ("PDPA") with respect to the collection, use and management of personal data.

This Privacy Policy describes:

- Personal data we collect or process
- How personal data is used, shared and protected
- Your rights in relation to personal data, including the right to make data access and correction requests

Personal data is collected only for lawful and relevant purposes and all practicable steps will be taken to ensure that personal data held by us is accurate. Block Tree will use your personal data which we may from time to time collect in accordance with this Privacy Policy.

Please note that if you do not consent to or do not provide Block Tree with personal data (or relevant personal data relating to persons appointed by you to act on your behalf), we may not be able to provide the information, products or services you have asked for or process your requests, applications, subscriptions or registrations, as applicable. For job applications, if you fail to provide the information, Block Tree may not be able to process your application.

If you have any questions about this Privacy Policy, please contact us via the email set out in this Privacy Policy.

Collection of Personal Data

Personal data includes any information that relates to an individual who can be identified from that information and/or other information in our possession. Block Tree can collect personal data from various sources. Some examples of data that can be personal data are:

- personal particulars, such as name, contact details, residential address, date of birth, identity card/passport details, and/or education details;
- biometric information;
- employment details, such as occupation, directorships and other positions held, employment history, salary, and/or benefits;
- tax information;
- information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- financial information, such as financial institution account numbers, transactions, source of funds and source of wealth;
- digital wallet information;
- information relating to your activities, preferences and interests arising from your use of Block Tree products and services; and

- personal information provided by job applicants and obtained in relation to background checks on job applicants.

Use of Personal Data

Block Tree may use personal data for our business purposes, including but not limited to:

- processing your applications, subscriptions and registration for Block Tree products and services;
- Conducting Know-Your-Customer checks and managing anti-money laundering, counter terrorism, sanction screening and fraud risks;
- administering your accounts and providing you with Block Tree products and services;
- managing our infrastructure, business operations and complying with internal policies and procedures;
- registering you for investor-related events, activities and materials;
- designing, installing and using software apps from relevant app stores;
- responding to and processing your enquiries and taking further actions or do follow-ups as required;
- marketing and promoting existing and future Block Tree products or services;
- providing you with online services available at Block Tree's websites, apps and/or through other telecommunication channels;
- using information that Block Tree's website collects about you to improve your experience while using our services;
- compiling general statistics in relation to the number of visitors to and usage of Block Tree ;
- conducting research, survey and/or analysis from time to time to better understand your needs, preferences, interests, experiences and/or habits;
- using your personal data for analytics;
- designing new and/or enhancing existing services, products and activities relating to Block Tree products or services;
- assessing job applicants for potential employment, verifying information provided relating to job applications and communicating regarding the recruitment process;
- and
- for other purposes directly relating to any of the above.

Block Tree may retain, process and/or disclose your personal data for the purposes specified in this Privacy Policy to third parties, including to:

- any person to comply with a court order, subpoena or other legal process (whether in Malaysia, Hong Kong, Singapore or elsewhere);
- any person to comply with applicable laws and regulations, including laws and regulations that apply to our agents, brokers and other third-party service providers;
- any member of Block Tree group being Block Tree and its affiliates;
- any person to comply with a request by a government authority, law enforcement agency or similar body (whether situated in Malaysia or elsewhere);

- prospective purchasers to whom Block Tree's businesses or any part of Block Tree's businesses will be sold, assigned or transferred to, if applicable; or
- any agents, contractors or other third-party service providers who provide administrative, human resource and employment, onboarding, legal, financial, management, operational, market surveillance, telecommunications, computer, payment, debt collection, data processing, data storage, data analytics or other services;
- any person in order to enforce any agreement with you, protect our rights, property or safety, or the rights, property or safety of our employees; and
- other third parties as notified at, and in accordance with additional privacy notice as provided at, the time of collection.

Use of Personal Data for Marketing Purposes

Block Tree may use your personal data to recommend to you products or services or other marketing or promotional purposes. Such marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls, facsimile and other mobile messaging services.

You may opt-out of such communications by following the directions provided in our marketing communication. To find out more on how you can change the way we use your personal data for marketing purposes, please contact us via the email set out in this Privacy Policy.

International Transfer of Personal Data

For the purposes specified in this Privacy Policy, Block Tree and its third-party service providers may transfer, store and process your personal data to or in a place outside Malaysia.

Use of Cookies

If you access Block Tree's information or services through Block Tree websites, you should be aware that cookies are used. Cookies are data files stored on your browsers. Block Tree's websites may automatically install and use cookies on your browsers when you access it, which are used to store your preferences, enhance the function of our websites, and facilitate your browsing. The cookies used in connection with our websites do not contain personal data. You may refuse to accept cookies on your browsers by modifying the settings in your browsers or internet security software. However, if you do so you may not be able to utilise or activate certain functions available on our websites.

Protection of Personal Data

All personal data provided to Block Tree will be securely stored with restricted access by authorized personnel only. We seek to prevent the unauthorised access, misuse or unlawful disclosure of personal data by using security procedures and technology.

In addition, we will adopt contractual or other means to prevent any personal data transferred to Block Tree's data processors from unauthorised access, misuse or unlawful disclosure, where Block Tree engages any data processor.

Amendments of this Privacy Policy

We may amend this Privacy Policy from time to time to ensure that this policy is consistent with any developments to the way we use your personal data or any changes to applicable laws and regulations. We will make available the updated policy on our website. All communications, transactions and dealings with us shall be subject to the latest version of this policy in force at the time.

Retention of Personal Data

We aim to retain your personal data no longer than is necessary for the fulfilment of the purposes of collection unless a longer retention period is required or permitted by applicable laws, rules and regulations.

Personal data of unsuccessful job applicants may be retained by Block Tree for a reasonable period in accordance with applicable laws, for consideration for future job opportunities, unless the applicant requests that Block Tree does not retain their information

Block Tree will take reasonable steps to ensure the accuracy of your personal data held by us. If Block Tree becomes aware that the personal data is inaccurate, we will not use such data and will notify any third party to which such personal data has been transferred regarding the same.

Access and Correction of Personal Data

Under applicable law, you may have the right to request for access to your personal data, to obtain a copy of the personal data, to correct any personal data that is inaccurate and to delete or cease the collection, processing or use of any personal data. You may request Block Tree to inform you of the type of personal data held by us.

Requests for access and correction of personal data or for information regarding policies and practices and kinds of data held by us should be addressed in writing and sent to our Data Protection Officer by email as specified in this Privacy Policy.

In accordance with the terms of applicable law, Block Tree has the right to charge a reasonable fee for the processing of any data access request.

Withdrawing Consent

You have the right to withdraw your consent to the processing of your personal data at any time. If you wish to exercise this right, please send a written notice to our Data Protection Officer at the email below. Your notice should include your name, contact information, and a detailed explanation of your request.

Upon receiving your notice, we will cease to process your personal data unless the processing is necessary to protect your vital interests or those of another person. We will confirm receipt of your notice and inform you of any ensuing implications. Please note that your withdrawal of consent may result in certain products and services no longer being available to you.

Contact

Block Tree Data Protection Officer - dpo@blocktree.co