

CULUM CAPITAL PTE LTD – PRIVACY NOTICE (“POLICY”)

Culum Capital Pte Ltd (“We”, “Us” and “Our”) are committed to protecting and respecting your privacy. All personal data provided by you to us whether through our email system, website or through our online supply chain financing platform (**our sites**) is dealt with in accordance with the Singapore Personal Data Protection Act 2012 (the “**Singapore Act**”).

This Policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Where our sites have gone online, by visiting our sites you are also deemed to be accepting and consenting to the practices described in this policy. If you do not accept these terms, you should not register your personal details or continue to use our sites.

CONSENT

- **Deemed consent.** You are deemed to consent to the collection, use or disclosure of your personal data for a purpose if: a) you voluntarily provide your personal data to us for that purpose, albeit without actually expressly providing your consent; and b) it is reasonable that you would voluntarily provide the data. If you give, or are deemed to give, consent to the disclosure of your personal data by us to another organisation for a particular purpose, then you are deemed to consent to the collection, use or disclosure of your personal data for that particular purpose by such other organisation. **By signing and returning to us the relevant Membership Application Form you are deemed to have consented to us collecting, using and disclosing your personal data and the information that you have provided to us as contemplated by this Policy.**
- **Withdrawal of consent.** On providing reasonable notice to us, you may at any time withdraw any consent given, or deemed to be given, in respect of our collection, use or disclosure of your personal data for any purpose. You may submit the withdrawal of consent via mail or email. On receipt of such notice, we shall inform you of the likely consequences of withdrawing your consent. Please allow up to 30 days for us to process and update your request. We shall not prohibit you from withdrawing your consent to the collection, use or disclosure of your personal data. If you withdraw your consent, then we shall cease (and cause our data intermediaries and agents to cease) collecting, using or disclosing your personal data unless otherwise required under the Singapore Act or other written law. Although you may have withdrawn consent for the collection, use or disclosure of your personal data, we may retain your personal data for purpose of administering your Policy with us and/or to comply with record retention periods as required by the Monetary Authority of Singapore.

INFORMATION WE MAY COLLECT FROM YOU

Information we may collect from you includes the following:

- **Information you give us.** You may give us information about you by filling in forms on our sites or by corresponding with us by phone, e-mail or otherwise, including results of any surveys we carry out. This also includes information you provide when you register with us, sign up to an event or to receive our newsletters, bulletins, or when you report a problem with our sites. The information you give us may include your personal particulars (e.g. name, contact details, residential address, date of birth, identity card/passport details, passwords, banking and financial information (e.g. income, expenses, bank account numbers, banking transactions, credit bureau history), employment details (e.g. directorships and other positions held, employment history, salary), information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets, personal descriptions, as well as any identification documents, video and photographs, personal opinions made known to us (e.g. feedback or responses to surveys). In some circumstances, you may have provided personal data relating to other individuals. You represent and warrant that you are authorised to provide their personal data to us and you have obtained their consent to the collection, use, disclosure and processing of their Personal Data in accordance with this Notice.

- **Information we collect about you.** With regard to each of your visits to our sites we may automatically collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our sites (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Cookies and tracking.** Please refer to the description under the heading **COOKIES**.
- **Information we receive from other sources.** We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

You acknowledge that the information provided by you in any manner may amount to personal or sensitive data under the Singapore Act and by continuing to use our sites you give consent to your data being processed as set out in this statement.

COOKIES

Our sites use cookies to distinguish you from other users of our sites. This helps us to provide you with a good experience when you browse our sites and also allows us to improve our sites. By continuing to browse the sites, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our sites. They include, for example, cookies that enable you to log into secure areas of our sites.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our sites when they are using it. This helps us to improve the way our sites work, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our sites. This enables us to personalise our content for you, greet you by name and remember your preferences.
- **Targeting cookies.** These cookies record your visit to our sites, the pages you have visited and the links you have followed. We will use this information to make our sites and the advertising displayed on them more relevant to your interests. We may also share this information with third parties for this purpose.

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our sites.

USES MADE OF THE INFORMATION

Information we hold about you may be used in the following ways or for the following purposes, including but not limited to:

- to provide the services that you have signed up for or use;
- to market to you or inform you of new services or potential services that we may be providing;
- to protect or enforce our rights or the rights of other members or users of our services;
- to improve our sites and to ensure that content from our sites is presented in the most effective manner for you and for your computer;
- to administer our sites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to allow you to participate in any interactive features of our service, when you choose to do so;
- as part of our efforts to keep our sites safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our sites about services that may interest you or them;
- to notify you about changes to our service;
- to verify your identity in order to prevent and detect money laundering and crime; and
- to carry out regulatory checks.

DISCLOSURE OF YOUR INFORMATION

We may share your personal information with any member of our group, which means any of our subsidiaries, ultimate holding company and its subsidiaries.

We may share your information with selected third parties including:

- other members or users of our services and professional advisers or service providers appointed (such as our escrow agent) or designated by us in connection with the provision of our services or the enforcement or protection of our rights or the rights of other members or users of our services;
- Advertisers and advertising networks that require the data to select and serve relevant adverts to you that you request from us or that we think may be of interest to you;
- Analytics and search engine providers that assist us in the improvement and optimisation of our sites;
- Credit reference agencies for the purpose of assessing your credit score;
- Service providers that support us in hosting or processing any data, maintaining any computer systems, hardware or software, or jointly or independently provide any services on or through our platform.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.

- If Culum Capital Pte. Ltd. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If this is disclosed in the course of providing services to you or if this is disclosed to your counterparties in a transaction or proposed transaction conducted or proposed to be conducted pursuant to the services that we are providing, and to ours and such counterparties' professional advisers or service providers in connection with such transactions.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements (including but not limited to the Member Agreement and CC Special T&Cs, where applicable); or to protect the rights, property, or safety of Culum Capital Pte. Ltd., our customers, other members or users of our services, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside Singapore. It may also be processed by staff operating outside Singapore who work for us or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We take the security and protection of your information very seriously. We will take all steps reasonably necessary to ensure that your data is treated securely against loss or theft, unauthorised access, undue disclosure and in accordance with this privacy policy.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our sites or our services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our sites or to us via electronic means; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. Alternatively, you can also exercise such right at any time by contacting us at dpo@culumcapital.com.

Our sites may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

ACCESS TO INFORMATION

The Singapore Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Singapore Act. We reserve the right to make a small administrative charge to cover our costs of doing this.

CORRECTION TO INFORMATION

You may request us to correct an error or omission in your information that is under our control or possession, unless we are satisfied on reasonable grounds that a correction should not be made or the law states otherwise.

We shall: a) respond to your request for correction within 30 days. If we are unable to fulfill your correction request within 30 days after receiving the request, we will inform you in writing of the time in which we are able to fulfill the correction request b) send your corrected information to every organisation to which your information was disclosed by us within a year before the correction was made, unless that other organisation does not need the corrected information for any legal or business purpose.

ACCURACY

We will endeavour to maintain the accuracy of the information. We shall not be held liable for data input errors made or submitted by users.

We will also take it that all information provided by you is accurate and complete, and that none of it is misleading or out of date. You will promptly update us in the event of any change to your information.

RETENTION

We will retain information for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of us, or as required by relevant laws.

When destroying information, we will take commercially reasonable and technically possible measures to make the personal information irrecoverable or irreproducible in accordance with the applicable laws.

CHANGES TO OUR PRIVACY POLICY

We ensure that this Policy remains current and continues to fulfil its objectives. We reserve the right to modify this privacy statement or any part of it at any time and any changes will be posted on the sites.

CONTACT

Please contact:

Data Protection Officer

Oxley Tower, 138 Robinson Road #11-03

Singapore 068906

Contact No.: +65-6386 9860

Email: dpo@culumcapital.com

- Regarding our privacy practices (including request forms for any correction, access or consent withdrawal)
- Submitting a complaint or grievance or question(s) or comment regarding how we are handling your personal data or about how we can comply with the Singapore Act.