

**PRIVACY POLICY  
(EU/EEA RESIDENTS AND CITIZENS)**

Effective Date: 1 August 2018

This Privacy Policy explains what information East2 Pte. Ltd., a company incorporated and registered in Singapore under UEN 201819877Z with its registered office at 10 Anson Road, #23-05A International Plaza, Singapore 079903 ("**East2**") gathers about you, the source of that information, what we use that information for, the lawful basis on which that information is used, and who we share that information with when you use products, services, content, features, technologies or functions offered by East2 and all related sites, applications, and services (collectively, the "**East2 Services**"). It also sets out your rights in relation to your information and who you can contact for more information or queries.

1. Overview and Legal Basis

1.1 Overview: In order to provide the East2 Services and to reduce the risk of fraud, East2, the data controller, must ask you to provide the information (as defined below) about yourself, including your bank account details, information about any other financial instruments that may be connected to your East2 wallet and the information particularly set out in Section 2 below.

1.2 Legal Basis: We are required by the General Data Protection Regulation (the "**GDPR**") to set out in this Privacy Policy the legal grounds on which we rely in order to process your information. We generally process your information because:

- it is necessary for the legitimate interests of the subsidiaries, affiliated companies and other related corporations of East2 (collectively, the "**East2 Group**"), including our interests in fulfilling the purposes in Section 3 below and when we make the disclosures referred to in Section 5 below, necessary for providing products and services of a consistently high standard, keeping our customers satisfied, and meeting our accountability and regulatory requirements around the world, in each case provided such interests are not overridden by your privacy interests;
- it is necessary for us to enter into, and perform our obligations under, our contract with you, such as when we use your data for the purposes in Section 3 below;
- it is necessary for compliance with a legal obligation under EU law or the laws of a Member State (e.g. any mandatory disclosures to an authority, regulator or government body); and
- in some cases, we have obtained your prior consent.

1.3 Information: For the purposes of this Privacy Policy, the term "information" means any information about you that we or our third-party service providers collect from you or a third-party, including such information set out in Section 2 below. East2 takes the processing of your information very seriously and will use your information only in accordance with the terms of this Privacy Policy. It is important for you to review this Privacy Policy as it applies to all of the East2 Services.

- 1.4 Notification of Changes: This Privacy Policy may be revised over time as new features are added to the East2 Services or as we incorporate suggestions from our customers. We may change this Privacy Policy at any time by posting a revised version of it on our website. Unless we have legal grounds to do so otherwise, we will provide you with at least 30 days' prior notice of the effective date of the revised privacy policy. We will post the notice on our website followed by a notification to you by e-mail.
- 1.5 Third-party Websites or Applications: Some pages on the websites of the East2 Group or parts of the East2 Services may include links to third-party websites. These sites are governed by their own privacy statements and terms of use, and East2 is not responsible for their operations, including but not limited to their information handling practices. Users submitting information to or through these third-party websites should review the privacy statements and terms of use of these sites before providing them with personally identifiable information. East2 is not responsible for the content or information practices of such third parties.

## 2. Information We Collect

- 2.1 Account Information: We will collect the following information for the purposes of opening and operating the East2 account.

(a) Account opening and usage

To open a East2 account or use the East2 Services, we need your:

- name;
- residential address (excluding P.O. boxes);
- phone number (including country code);
- the details of your identification document(s); and
- email address.

(b) Topping up and making payments

To top-up your available balance of your East2 account or make certain payments through the East2 Services, we need (where applicable):

- your ETH public address or another payment instrument account information;
- to ask you to choose different security questions and answers (such as your city of birth or your pet's name); and
- other additional commercial and/or identification information, if you send or receive certain high-value transactions or high overall payment volumes through the East2 Services, or we are otherwise required by anti-money laundering laws and regulations.

(c) Know-Your-Client/Anti-Money Laundering information from third parties and other sources:

In order to complete our customer screening and identity verification process, including checks in relation to fraud detection and prevention, anti-money laundering, know-your-client and countering of the financing of terrorism, we verify the information you provide with the East2 Group, payment partners, service providers and fraud agencies as well as information available through internet and publicly accessible social network data. In the course of such verification, we will collect

information on your political opinions, records on past criminal jurisdictions and whether you are a politically exposed person or included in any sanction list.

We need you to upload a picture of yourself and your face must be recognizable in order for us to complete our customer screening and identity verification process.

(d) Confirmations and additional information:

If we cannot verify the information that you provide, we may ask you to upload or send us additional confirmations or to answer additional questions online to help verify your information.

If you send or receive high overall payment volumes or display inconsistent transactional patterns through the East2 Services, or if you have a limited transactional history with us, we will conduct a background check on you by obtaining information about you and/or your business, and potentially (if legally permitted) also about your directors, shareholders and partners, from a credit reference or fraud agency. If you owe us money, we may obtain additional information about you from a fraud agency, to the extent permitted by law. East2, at its sole discretion, reserves the right to periodically retrieve and review a business and/or consumer credit report supplied by such credit reference or fraud agency for any account, and reserves the right to close an account based on information obtained during this credit review process.

2.2 Provision of the East2 Services: We also will collect the following information to provide you with the East2 Services:

(a) Using your Device:

When you use the East2 Services using any device (whether connected to East2 wirelessly or by a fixed line or otherwise), we will additionally collect and store device sign-on data (including but not limited to device ID) and geolocation data in order to provide the East2 Services.

(b) Loyalty Information:

If we allow you to link your membership of an eligible loyalty scheme to your account, we need your loyalty scheme membership details to enable us to track your membership and calculate applicable fees, discounts or other loyalty benefits.

(c) Transaction Information:

When you use the East2 Services to send funds to someone else, we will ask you to provide information related to that transaction. This information includes the amount and type of transaction (such as purchase of goods, purchase of services, or simple peer-to-peer transfer), and the details pertaining to the identity of the third-party. Also, when you send money to another East2 customer, you may be asked to provide your personal details to that customer to complete the transaction. Your personal details may then be passed on to us from that customer. We also collect the IP address and other identifying information about the computer or device you use to access your East2 account or use the East2 Services, in order to help detect possible instances of unauthorized transactions.

(d) Website Traffic Information:

Because of the way Internet communication standards work, when you arrive at or leave the East2 website, we automatically receive the web address of the site that you came from or are going to. We also collect information on the pages of our website which you visit, IP addresses, the type of browser you use and the times you access our website.

(e) Cookies, Web Beacons, Local Storage and Similar Technologies:

When you access our website or use the East2 Services, we (including companies we work with) may place small data files on your computer or other device. These data files include cookies, pixel tags, Flash cookies, or other local storage provided by your browser or associated applications (collectively "**Cookies**"). We use Cookies to recognize you as a customer, customize the East2 Services, content and advertising, measure promotional effectiveness, help ensure that your account security is not compromised, mitigate risk and prevent fraud, and to promote trust and safety across our sites and the East2 Services. You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our website and the East2 Services.

(f) Communications:

When you communicate with us for customer service or other purposes (e.g., by emails, phone calls, tweets, etc.), or provide any feedback, we retain such information and our responses to you in the records of your account.

(g) Questionnaires, Surveys, Action Projects:

From time to time, we offer optional questionnaires, surveys and action projects to our users for such purposes as collecting demographic information or assessing users' interests and needs. If we collect personally identifiable information from our users in these questionnaires, surveys, and action projects, the users will be given notice of how the information will be used prior to their participation in the survey, questionnaire or sweepstake.

(h) Profile Data:

We may also collect public information about your business and your behavior on social media platforms (such as your e-mail address and the number of "likes" and "followers"), to the extent relevant to confirm an assessment of your transactions and/or your business, including its size and the size of its customer base.

2.3 We set out in Section 3 below greater detail (in addition to what is set out in the foregoing of this Section 2) on how we use the information we collect.

### 3. How We Use the Information We Collect

In general, we process the aforementioned personal data in compliance with Singapore law and the provisions of the EU General Data Protection Regulation (GDPR) and (a) for the performance of contractual obligations (article 6 (1) b) GDPR); (b) for the purposes of safeguarding legitimate interests (article 6 (1) f) GDPR); (c) on the basis of your consent (article 6 (1) a) GDPR) insofar as you have granted us consent to the processing of personal data for specific purposes provided that any consent granted may be revoked at any time provided that this also applies to the revocation of declarations of consent that are granted to

us prior to the entry into force of the EU General Data Protection Regulation, i. e., prior to 25 May 2018 (please be advised that the revocation shall only have effect for the future and any processing that was carried out prior to the revocation (if any) shall not be affected thereby. You can request a status overview of the consents you have granted from us at any time); (d) for compliance with a legal obligation (article 6 (1) c) GDPR) or in the public interest (article 6 (1) e) GDPR).

In particular, we will use your information for the following purposes:

- 3.1 Internal Uses: Our primary purpose in collecting your information is to provide you with a safe, smooth, efficient, and customized experience in your use of the East2 Services. We do this by processing your information to:
- process transactions and provide the East2 Services;
  - complete our customer screening and identity verification process including checks in relation to fraud detection and prevention, anti-money laundering, know-your-client and the countering of the financing of terrorism;
  - resolve disputes, collect fees, and troubleshoot problems;
  - manage risks and carry out investigations, in relation to any illegal activity or potential illegal activity or transactions for breach or potential breach of our terms and conditions;
  - provide you with customer support services;
  - improve the East2 Services by customising your user experience;
  - measure the performance of the East2 Services and improve their content and layout;
  - manage and protect our information technology infrastructure;
  - provide targeted marketing and advertising, service updates, and deliver promotional offers based on the communication preferences you have defined for your East2 account (please refer to the section "Our Contact with East2 Customers" below) and your activities when using the East2 Services; and
  - perform creditworthiness and solvency checks, compare information for accuracy, and verify it with third parties.
- 3.2 Questionnaires, Action Projects, Surveys and Profile Data: If you choose to answer our optional questionnaires or surveys, we may use such information to improve the East2 Services, send you marketing or advertising information, manage the sweepstakes, or as otherwise explained in detail in the survey itself.
- 3.3 Our Contact with East2 Customers: We communicate with our users on a regular basis via email and chats to provide requested services. We may also communicate with our users by phone to:
- resolve customer complaints or claims made by users;
  - respond to requests for customer service;
  - inform users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
  - confirm information concerning a user's identity, business or account activity;
  - carry out collection activities;
  - conduct customer surveys; and
  - investigate suspicious transactions.

We use your email or physical address to confirm your opening of a East2 account, to send you notice of payments that you send or receive through East2, to send you information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional.

We also use your email address to send you other types of communications that you can control, including "news" and "notice of special third-party promotions". You can choose whether to receive some, all or none of these communications when you complete the registration process, or at any time thereafter, by logging in to your account and then selecting settings and updating your preferences.

3.4 Other purposes: In some cases, we will also use your information for the purposes of, or in connection with:

- independent audits of our financial statements and operations - the auditors may seek to contact a sample of our customers to confirm that our records are accurate. However, these auditors cannot use personally identifiable information for any secondary purposes;
- an official request from a public or judicial authority where either compelled by law or where appropriate in all the circumstances;
- applicable legal or regulatory requirements;
- financial accounting and invoicing purposes;
- maintaining and managing insurance and insurance claims relating to our business;
- services we receive from our professional advisors, such as lawyers, accountants, insurance brokers and consultants;
- the transfer to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of East2's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it; and
- protecting our rights and those of the East2 Group.

4. Marketing

We may combine your information with other information we collect from other companies and use it to improve and personalize the East2 Services and send marketing communications to you. You will only receive such marketing communications from us or may participate in our ad-customization programs if you have expressly consented to doing so. If you have consented, but no longer wish to receive marketing communications from us or participate in our ad-customization programs, simply update your preferences.

5. How We Share your Information with Other Third Parties

We will share your information with the following types of third parties in the circumstances described below.

5.1 Disclose necessary information to the police and other law enforcement and/or fraud prevention agencies:

Such entities include security forces, competent governmental, inter-governmental or supranational bodies, regulatory authorities and recognised self-regulatory authorities. Disclosure to such entities will be made where (i) the law (including but without limitation the

GDPR, the applicable regulations on the US Foreign Account Tax Compliance Act (the "**FATCA Law**"), and regulations on the OECD common reporting standard (the "**CRS Law**") compels or permits us; or (ii) we have reason to believe it is appropriate for us to cooperate with such entities for checks in relation to fraud detection and prevention, anti-money laundering, know-your-client and countering of the financing of terrorism, or investigations in relation to any other illegal activity or potential illegal activity. If you are covered by the FATCA Law or the CRS Law, we are required to give you notice of the information about you that we may transfer to various authorities.

- 5.2 Disclose necessary information to other third parties such as payment processors, auditors, financial products providers, business partners, marketing and public relations agencies, shipping and courier companies, East2 Group companies, marketplaces, service providers and your agents or legal representatives:

Such disclosure is required for purposes of our provision of the East2 Services, investigations into transactions on breach or potential breach of our terms and conditions, support of our business operations, checks in relation to fraud detection and prevention, anti-money laundering, know-your-client and countering of the financing of terrorism, investigations in relation to any other illegal activity or potential illegal activity, bill collection, marketing, provision of customer support services and public relations purposes.

- 5.3 Disclose necessary information to intellectual property rights owners:

Such disclosure is required under the applicable national law in the event that an owner of intellectual property rights commences any action or pursues a claim against East2 for an out-of-court information disclosure due to an infringement of their intellectual property rights for which the East2 Services have been used.

- 5.4 Disclose necessary information to card networks and schemes:

Such disclosure is required in response to the requirements of any card networks through which your use of the East2 Services may rely on from time to time (such as Visa and Mastercard).

- 5.5 Grant access to information in event of mergers or acquisitions involving East2:

As with any other business, it is possible that in the future East2 could merge with, or be acquired by, another company. If such merger or acquisition occurs, the successor company will have access to your Account Information maintained by East2, and this Privacy Policy continues to apply to such successor company unless and until it is amended.

- 5.6 Disclosing transactional details of East2 users in event of transfer of funds between them:

If you are a registered East2 user and you are sending funds or transacting with another registered East2 user, as a part of the transaction, the name, email address, date of sign-up and pertinent transactional details of both parties will be shared as a part of transaction notification. However, your card number, bank account and other financial information will not be revealed to anyone whom you have paid or who has paid you through the East2 Services or third parties that use the East2 Services, except with your express permission or if we are required to do so pursuant to credit card rules, a court order or other legal process.

- 5.7 Disclosing information to sellers when East2 users use purchase goods/services using the East2 Services:

If you are buying goods or services and pay through East2, we may provide the seller with the delivery address for the goods and your billing address to complete your transaction. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

5.8 Disclosing information to loyalty schemes of which East2 users are members:

If you link your membership of an eligible loyalty scheme to your account in our mobile app, we will share your loyalty scheme membership ID with the relevant loyalty scheme when you pay using East2. If you remove your loyalty scheme membership ID from your Account, we will stop sharing this information.

5.9 Disclosing information to third-party service providers who facilitate payments from or to you:

We work with third parties to enable them to accept or facilitate payments from or to you using the East2 Services. In doing so, a third-party may share information about you with us such as your email address or phone number, when a payment is sent to you or when you are attempting to pay that third-party. We use this information to confirm that you are a East2 customer and that East2 can be enabled to make a payment, or where a payment is sent to you to send you a notification that you have received a payment. Also, if you request that we validate your status as a East2 customer with a third-party, we will do so. Please note that third parties you receive funds or buy from may have their own privacy policies, and East2 is not responsible for their operations, including but not limited to their information handling practices.

6. Cross Border Transfers of your Information

6.1 Please note that some of the recipients of your information referred to above will be based in countries outside of the European Economic Area whose laws may not provide the same level of data protection. These countries are: Singapore and the United States. East2 is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EEA.

6.2 The appropriate safeguard we use to secure your information in the context of such transfers are the EU Model Clauses. You can find a sample of such EU Model Clauses under [http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm) or contact our data protection officer (see Section 10 below).

6.3 Further details of the transfers of your information outside of the European Union and the adequate safeguards used by us in respect of such transfers (including copies of relevant agreements) are also available from us by contacting our data protection officer.

7. Your Rights

7.1 You have certain rights in relation to your information. Where you contact us to exercise your rights, we will honour your privacy request as required under the GDPR but your rights are not absolute as they do not always apply and exemptions may be applicable. You may also contact our data protection officer if you wish to make a complaint to us relating to your privacy.

7.2 Under the GDPR, you have rights:



- of access to, rectification of, and/or erasure of your information;
- to object to processing of your information;
- withdraw consent to our processing of your information (to the extent such processing is based on consent) or restrict our processing of your information;
- where processing your information is necessary for entering into or performing our obligations under a contract with you, you may have the right to request your information be transferred to you or to another controller; and
- to request not to be subject to automated decision making.

To exercise any of your rights, or if you have any other questions about our use of your information, please contact our data protection officer.

- 7.3 Finally, you have the right to lodge a complaint with the data protection authority in the place where you live or work, or in the place where you think an issue in relation to your data has arisen.
- 7.4. Additional Information relating to the EU General Data Protection Regulation (GDPR).
- 7.4.1 Ad hoc right to object. You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on article 6 (1) e) GDPR (processing in the public interest) and article 6 (1) f) GDPR (processing for the purposes of safeguarding legitimate interests); this includes any profiling based on those provisions within the meaning of article 4 (4) GDPR. If you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or unless the processing is for the establishment, exercise or defense of legal claims.
- 7.4.2 Right to object to the processing of data for marketing purposes. In certain cases, we process your personal data for direct marketing purposes. You have the right to object at any time to processing of personal data concerning yourself for such marketing, which includes profiling to the extent that it is related to such direct marketing. If you object to processing for direct marketing purposes, we will no longer process your personal data for such purposes. There are no formal requirements for lodging an objection; where possible it should be made by email to [help@east.io](mailto:help@east.io) or by mail to the registered office address of the Company.
- 7.4.3 Within the scope of our business relationship, you must provide personal data which is necessary for the initiation and execution of a business relationship and the performance of the associated contractual obligations or which we are legally obligated to collect. As a rule, we would not be able to enter into any contract or execute the order without these data or we may no longer be able to carry out an existing contract and would have to terminate it. In particular, provisions of money laundering law require that we verify your identity before entering into the business relationship, for example, by means of your identity card and that we record your name, place of birth, date of birth, nationality and your residential address. In order for us to be able to comply with this statutory obligation, you must provide us with the necessary information and documents in accordance and notify us without undue delay of any changes that may arise during the course of the business relationship. If you do not provide us with the necessary information and documents, we will not be allowed to enter into or continue your requested business relationship.
- 7.4.4 Every data subject has a right of access (article 15 GDPR), a right to rectification (article 16 GDPR), a right to erasure (article 17 GDPR), a right to restriction of processing (article 18

GDPR), a right to object (article 21 GDPR) and a right to data portability (article 20 GDPR). The right of access and right to erasure may be subject to legal restrictions. Data subjects also have a right to lodge a complaint with a supervisory authority (article 77 GDPR). You may revoke your consent to the processing of personal data at any time. This also applies to the revocation of declarations of consent (if any) that are granted prior to the entry into force of the EU General Data Protection Regulation, i.e., prior to 25 May 2018. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

7.4.5 Automatic decision-making and profiling. As a rule, we do not make decisions based solely on automated processing as defined in article 22 GDPR to establish and implement the business relationship. If we use these procedures in individual cases, we will inform you of this separately, provided that this is prescribed by law. In some cases, we process your data automatically with the aim of evaluating certain personal aspects (profiling). For instance, we use profiling in the following cases: (a) We are required by law to take anti-money laundering and anti-fraud measures. Data evaluations are also carried out (in payment transactions, among other things) in this context. These measures also serve to protect you; (b) In order to provide you with targeted information and advice on products, we use evaluation tools. These enable demand-oriented communication and advertising, including market and opinion research.

## 8. Retention of your Account Information

- 8.1 We will retain your information for as long as necessary to fulfil the purposes outlined in Section 3. However, we will retain your information for a longer period where required by law and for the duration of any statutory limitation period for claims.
- 8.2 In general, although there are limited exceptions, we will retain your information during the period when you are using the East2 Services and for at least six (6) years after your use of the East2 Services ceases.

## 9. Information Security

- 9.1 East2 is committed to handling your information with high standards of information security. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to information only for those employees who require it to fulfil their job responsibilities.
- 9.2 The security of your East2 account also relies on your protection of your East2 password. You may not share your East2 password with anyone. East2 representatives will never ask you for your password, so any email or other communication requesting your password should be treated as unauthorized and suspicious and forwarded to [help@east2.io](mailto:help@east2.io). If you do share your East2 password with a third-party for any reason, including because the third-party has promised to provide you additional services such as account aggregation, the third-party will have access to your account and your information, and you may be responsible for actions taken using your password. If you believe someone else has obtained access to your password, please change it immediately by logging in to your account and changing your Profile settings, and also contact us right away.

## 10. Accountability and Data Protection Officer

Our privacy office and our data protection officer are responsible for ensuring that our day-to-day procedures comply with this Privacy Policy. If you want to exercise your right to access

your information or have any questions about this Privacy Policy, East2's information practices, or your dealings with East2 in relation to your information, you can contact us by emailing [help@east2.io](mailto:help@east2.io) or write to us at: East2 Pte. Ltd., Data Protection Officer, 10 Anson Road, #23-05A International Plaza, Singapore 079903.

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