

Privacy Policy

Singapore

Last update: 31st of July 2020

COFFE.IO platform (hereinafter, "**COFFE.IO**", "we", "us" or "our") are committed to protect and respect your privacy.

COFFE.IO is managed by **SITECHEXPORT PTE. LTD.**, Company number **201606898C**, a Singapore Company, with the registered office located at 30 CECIL STREET, #19-08, PRUDENTIAL TOWER, SINGAPORE (049712)..

This Privacy Policy governs the collection, processing and use of Users' Personal Information of **COFFE.IO** platform.

1. Basic Definitions

1.1. The basic definitions used in this Privacy Policy:

- **Personal Information (personal data)**: any information which identifies you personally or which may help us to identify you (e.g. your name, address, e-mail address, trades etc.).
- **Data subject**: an identified or identifiable person (our User).
- **Data controller**: a company which determines purposes and means of personal data processing.
- **Data processor**: a company which processes personal data on behalf and upon instructions of the Data controller.
- **Personal data processing**: any operation or set of operations performed on personal data (e.g., collection, storage, use, disclosure erasure).

1.2. Other terms, not defined above, have the meanings as defined in the applicable data protection legislation.

2. Purpose of this Privacy Policy

2.1. The purpose of this Privacy Policy is to inform about:

1. **COFFE.IO** platform;
2. the kinds of Personal Information which **COFFE.IO** may collect about its users, the reasons for collecting this information, how it may be used and for how long **COFFE.IO** will keep it;
3. the use of information by **COFFE.IO** regarding IP addresses and use of cookies by users of platform;
4. disclosure of Personal Information to third parties;
5. information on international data transfer;

6. user's ability to access, correct, update, restrict use, ask **COFFE.IO** platform to transfer and/or delete his/her Personal Information;
7. the use of user's Personal Information by **COFFE.IO**;
8. the security measures that **COFFE.IO** has to prevent the loss, misuse, or alteration of Personal Information under control of **COFFE.IO**, and
9. the rights of the users to lodge a complaint.

3. Gathering of Personal Information

3.1. COFFE.IO may collect user's Personal Information when he/she uses **COFFE.IO** platform and opens an Account to use the Platform of **COFFE.IO** or perform any actions on the platform. This is defined as a collection for the purpose of provision of service(s) of **COFFE.IO**.

Please note that if the user refuses to share his/her Personal Information for these purposes **COFFE.IO** can limit the services to the user.

4. Types of Personal Information

- 4.1. The types of Personal Information which **COFFE.IO** collects may include:
1. the name of the user;
 2. user's photographic identification;
 3. details from user's ID documents (such as driver license, passport), number of the document, date of issue and expiration, photographic identification, address etc.;
 4. user's address;
 5. user's phone number;
 6. user's email address;
 7. user's IP address, Browser and Operating System information, geolocation details;
 8. user's banking details including account numbers and payment card data;
 9. user's date of birth;
 10. user's employment details;
 11. your trades, transactions and;
 12. information on sources of user's funds.

5. Use of Personal Information

5.1. COFFE.IO will process user's Personal Information only for the purpose(s) of providing the service(s) that user asks **COFFE.IO** to provide, to satisfy the legal obligations stemming from regulatory obligations that arise from providing the service(s) and legitimate interest of **COFFE.IO**.

5.2. Based on legal obligations of **COFFE.IO** and legitimate interests, **COFFE.IO** may request other documents for identity verification of user and the sources of his/her funds confirmation for the purposes of money laundering and fraud prevention.

6. Purposes of Use of Personal Information

6.1. **COFFE.IO** may use user's Personal Information for the following purposes:

1. to allow user to open and operate an Account on the Platform;
2. to enable user to complete the transactions on the Platform;
3. to reply to user's queries if he/she contacts **COFFE.IO**;
4. to analyse the use of website of **COFFE.IO**;
5. as required for regulatory purposes such as Tax, prevention of Money Laundering, prevention of Fraud, adherence to Company statistical reporting obligations etc.;
6. to provide user with information about the products and promotions that may be of interest to user, from **COFFE.IO** and third parties, if user has specifically agreed to receive such information;
7. for market research e.g. surveying Users' needs and opinions on issues, such as performance of **COFFE.IO** and etc. Unless consented, user's data for this purpose would be anonymised.

7. Use of Children's Personal Data

7.1. Services of **COFFE.IO** are exclusively offered to individuals at least 18 years old.

7.2. **COFFE.IO** does not process any Personal Information of children under this age.

8. Use of IP Addresses

8.1. **COFFE.IO** platform may collect the information about user's computer, including where available user's IP address, operating system and browser type, for system administration and to report aggregate information to advertisers.

8.2. This is statistical data about users' browsing actions and patterns. This information will not be used to identify any individual.

9. Use of Cookies

9.1. **COFFE.IO** uses a browser feature known as a "cookie", which assigns a unique identification to user's computer. Cookies are typically stored on computer's hard drive of user.

9.2. The information collected from cookies is used by **COFFE.IO** to evaluate the effectiveness of website of **COFFE.IO**, analyse trends, and administer the Platform.

9.3. The information collected from cookies allows **COFFE.IO** platform to determine what pages of **COFFE.IO** website are the most visited. The difficulties of visitors of **COFFE.IO** may experience in accessing the website. With this knowledge **COFFE.IO** can improve the quality of the Platform by recognising and delivering more of the most desired features and information, as well as by resolving the access difficulties.

9.4. **COFFE.IO** also uses cookies and/or a technology known as web bugs or clear gifs, which are typically stored in emails to help us confirm the user's receipt of, and response to, our emails and to provide the users with a more personalised experience using the **COFFE.IO** website.

9.5. **COFFE.IO** uses the services of third party service provider(s), to assist us in better understanding the use of our website. Our service provider(s) will place cookies on the hard drive of user's computer and will receive information that **COFFE.IO** selects that will educate **COFFE.IO** about how visitors navigate around the site, what products are browsed, and general information.

9.6. The service provider(s) of **COFFE.IO** analyses this information and provides **COFFE.IO** with aggregate reports. The information and analysis provided by the service provider(s) will be used to assist **COFFE.IO** in better understanding of visitors' interests in the **COFFE.IO** website and how to better serve those interests.

9.7. The information collected by service provider(s) of **COFFE.IO** may be linked to and combined with information that **COFFE.IO** platform collects about the users while they are using the Platform.

9.8. Service provider(s) is/are contractually restricted from using the information they receive from **COFFE.IO** website other than to assist us.

9.9. By using the **COFFE.IO** website the users are agreeing that **COFFE.IO** platform may use cookies for the purposes set out above.

9.10. The company will keep records of all transfers of Personal Information to third parties and this information, if it is possible, can be provided to user.

10. Disclosure of Personal Information

10.1. **COFFE.IO** platform uses the Personal Information for the purposes indicated at the time when the user provides **COFFE.IO** with such information, and/or for the purposes set out in this Privacy Policy and/or permitted by the law.

10.2. **COFFE.IO** may make available the Personal Information that the user provides to us for the limited purpose indicated for and during the provision of the service that the user would have requested in particular to:

- payment service providers and financial institutions;
- customer communications platforms;
- contractors of **COFFE.IO** providing software for identity verification purposes;
- contractors of **COFFE.IO** providing us information on sanctions lists from the publicly accessible sources.

10.3. COFFE.IO may also share Users' Personal Information with financial institutions, insurance companies or other companies in the case of a merger, divestiture, or other corporate re-organisation and notify the user of such sharing of user's information to be able to exercise any of user's rights where applicable.

10.4. COFFE.IO may also share Users' Personal Information with the law enforcement or regulatory agencies, as may be required by the law. In certain cases, **COFFE.IO** may not be able to inform the user of such sharing of data due to the legal restrictions.

10.5. Any third party which receives or has access to Personal Information shall be required by **COFFE.IO** to protect such Personal Information and to use it only to carry out the services they are performing for users or for **COFFE.IO**, unless otherwise required or permitted by law. Such a third party, except for regulatory authorities, would be contractually bound to adhere to the same security and confidentiality policies as **COFFE.IO** and assume the same responsibilities as **COFFE.IO**.

10.6. The legitimate exercise of any of user's rights with **COFFE.IO** will also be notified to be applied by any third parties having been given access to your Personal Information.

10.7. COFFE.IO will ensure that any third party is aware of our obligations under this Privacy Policy.

10.8. COFFE.IO will enter into contracts with third parties by which they are bound by terms no less protective of any Personal Information disclosed to them than the obligations that **COFFE.IO** undertakes to the users under this Privacy Policy or which are imposed on **COFFE.IO** under the applicable data protection laws.

11. International Data Transfers

11.1. Contractors and affiliates of **COFFE.IO** platform are situated at different locations and countries and **COFFE.IO** sometimes needs to transfer user's personal data to third countries to provide our services to the users.

11.2. COFFE.IO strives to ensure adequate level of user's personal data protection wherever our contractor is located.

11.3. COFFE.IO may transfer user's Personal Information only in the following cases:

- if the country where **COFFE.IO** transfers user's Personal Information provides the adequate level of personal data protection;
- if **COFFE.IO** takes appropriate safeguards to ensure that user's rights as data subject are protected;
- if any derogations for specific situations apply (for instance, if is such transfer is necessary for the establishment, exercise or defence of legal claims or for important reason of public interest).

12. User's Rights

12.1. User has the right to access user's Personal Information and to require the correction, updating and blocking of inaccurate and/or incorrect data by sending an email to **COFFE.IO** or where it is possible, user can do these actions in user's account profile page by him/herself.

12.2. Upon user's written request at support service, **COFFE.IO** will inform the user of the Personal Information relating to him/her that **COFFE.IO** holds and the use and general disclosure of user's Personal Information.

12.3. COFFE.IO will also give the user a copy of the Personal Information that **COFFE.IO** has retained. There may be a minimal charge for providing the user the additional copies of user's Personal Information to cover the administrative costs.

12.4. The user may also request the deletion or destruction of both the Account and Personal Information by sending an email to the support service. **COFFE.IO** will action user's request immediately, except, if this is not consistent with its legal and regulatory obligations.

12.5. The user may also ask **COFFE.IO** to transfer his/her Personal Information to another controller of his/her choice.

12.6. To ensure the confidentiality, integrity and availability of user's information, **COFFE.IO** may request the user to confirm his/her identity by providing the identification documentation and/or other methods prior to assisting the user in exercising any of his/her rights.

12.7. If the user refuses to prove his/her identity, **COFFE.IO** may decline to take actions in respect of user's data, save restricting processing, until **COFFE.IO** can ensure that such actions are the true wish of the data subject.

12.8. In the carrying out of our services **COFFE.IO** may use the automated processing and profiling to reduce the risks of fraud, money laundering and abuse of services of **COFFE.IO**. Through this automated processing, **COFFE.IO** carries out an analysis of user's identification, transactional and behavioural patterns.

12.9. COFFE.IO may not be able to provide the user with some or all our services if the user does not wish this automated processing to be carried out. If the user feels that this processing might be detrimental to him/her, the user may contact the support service, and **COFFE.IO** will review this application.

13. Security

13.1. COFFE.IO has implemented technical and organisational security measures to ensure the confidentiality, integrity and accountability of user's Personal Information and to protect user's Personal Information from loss, misuse, alteration or destruction.

13.2. Such measures include:

- the encryption of personal data;
- the access control;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services of **COFFE.IO**;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident.

13.3. Only authorised personnel of **COFFE.IO** has access to user's Personal Information, and these personnel are required to treat the information as confidential.

13.4. Where the user has consented to, or **COFFE.IO** is obliged to pass on Personal Information to third parties to provide the user with a requested service or in the carrying out of a regulatory or legal obligation, **COFFE.IO** will request that the same levels of technical and organisational security measure be applied through the contractual arrangements, where possible.

13.5. COFFE.IO conducts testing, assessment and evaluation of our technical and organisational measures effectiveness on a regular basis. Technical and organisational security measures will, from time to time, be reviewed in line with the legal and technical developments.

13.6. In the event of a personal data breach or the failure of the measures of protection of such information **COFFE.IO** will immediately notify the user without undue delay.

14. Links

14.1. There may be links from the **COFFE.IO** website to other sites and resources provided by third parties. This Privacy Policy applies only to the **COFFE.IO** website. Accessing those third-party sites or sources requires the user to leave the **COFFE.IO** website.

14.2. COFFE.IO does not control those third party sites or any of the content contained therein and the user agrees that **COFFE.IO** is in no way responsible or liable for any of those

third party sites, including, without limitation, their content, policies, failures, promotions, products, services or actions and/or any damages, losses, failures or any problems related to or arising from those sites.

14.3. COFFE.IO encourages the user to review all policies, rules, terms and regulations, including the privacy policies, of each site that he/she visits.

15. Retention of Personal Information

15.1. User's information is held on the servers of **COFFE.IO** located in different countries. Access to this information is provided to employees of **COFFE.IO** who adhere to the same principles of data security and processes as those within Singapore where **COFFE.IO** is registered.

15.2. COFFE.IO will hold user's Personal Information only for as long as it is necessary for the purposes described in this Privacy Policy and legal and regulatory requirements.

15.3. In accordance with the record keeping activities for Anti-Money Laundering, Tax and Company legal obligations and considering the period during which the user may bring the legal claims against **COFFE.IO** under the law of Singapore.

15.4. Data stored for regulatory purposes will be protected from the unnecessary processing and will be held only for the purpose of being able to provide information or access to relevant authorities.

16. Disposal of Personal Information

16.1. Once **COFFE.IO** does not have any obligation to providing the user with a service he/she requested, nor an obligation to hold the Personal Information for regulatory or legal purpose, **COFFE.IO** will anonymise or dispose of user's Personal Information in line with acceptable industry and security standards so that this cannot be subsequently retrieved and associated to user.

16.2. Where **COFFE.IO** cannot directly remove such records, such as archived backups, **COFFE.IO** will retain a log of which Personal Information should be removed if ever the backup data is restored.

17. Marketing

17.1. COFFE.IO will ask the for user's consent on registration or post-registration, by the providing him/her the ability to check the marketing preferences check boxes located within the user's account profile page to allow us to contact the user or use user's Personal Information for marketing purposes.

17.2. **COFFE.IO** platform may also notify the existing Users on our own products or services similar to those **COFFE.IO** has already provided based on our legitimate interest.

17.3. User has the right to retract the consent for **COFFE.IO** to process user's Personal Information for marketing purposes.

17.4. User can exercise his/her right to prevent such processing by unchecking marketing preferences check boxes on his/her account profile or by contacting **COFFE.IO** at any time on support service.

18. Changes

18.1. **COFFE.IO** policies, content, information, promotions, disclosures, disclaimers and features may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of **COFFE.IO**.

18.2. If **COFFE.IO** changes this Privacy Policy, it will take the steps to notify all users by a notice on the **COFFE.IO** website and will post the amended Privacy Policy on the website.

18.3. If **COFFE.IO** considers that user's rights may be affected by any such changes, **COFFE.IO** will request the user to confirm his/her consideration and acceptance prior to continue our relationship with the user.

19. Fraud, Phishing and Email Scams Disclaimer

19.1. Please be notified that **COFFE.IO** is not in any partnership with entities who represent themselves as customer support agents, providing customer support services via phone and/or social media and promise to help to solve user's issues for money.

19.2. Remember - customer support is provided only via the **COFFE.IO** website and is always provided free of charge.

19.3. If the user discovered what he/she believes is a fraud, phishing, or scam which impersonates **COFFE.IO** he/she can email **COFFE.IO** at support service.