

PAYD PRIVACY POLICY

Last modified: 3 February 2021

Effective Date: 3 February 2021

Payd Pte. Ltd., a private company registered in the Republic of Singapore with its registered office at 68 Circular Road #02-01, 049422, Singapore (together with Payd Pte. Ltd.'s current and future subsidiaries and affiliates, "**Payd**," "**we**," "**us**," or "**our**") is in the business of providing earned wage access services to employees of our partner companies, on and through our Payd Application ("**Payd Application**"), which is designed to operate on mobile devices and personal computers with the use of Internet ("**Services**").

This Privacy Policy is part of, and incorporated into, our Terms of Service. Please review this Privacy Policy in together with our other policies before you create an account with us or before you use or access our Services. By installing, creating an account, interacting with us, accessing or using any of our Services, you hereby confirm that you accept the terms of this Privacy Policy, which shall constitute a binding agreement between you and us, and agree to comply with them.

This Privacy Policy supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any right that we may have at law in connection with the collection, use, disclosure and/ or retention of your Personal Data.

1. PERSONAL DATA

- 1.1 "Personal Data" refers to any personally identifiable information which you or your employer have provided to us in connection with the use of our Services, including but not limited to, when you create an account with us, receive payments from us, or use our Payd Application. Examples of Personal Data include but are not limited to: your full name, your marital status, ethnicity, your mailing address, email address, mobile number, information relating to payments, such as your bank account number, the number of withdrawals and the amounts withdrawn, and information relating to your employment, such as your monthly salary, your employer's name and hours and days worked.
- 1.2 Non-personally identifiable information which is collected automatically through the use of software or other automated processes when you interact with our Services.

2. COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

- 2.1 Generally, we collect your Personal Data where it is provided to us voluntarily by you directly or via your employer or such other third parties who have been duly authorised by you to disclose your Personal Data to us ("**Authorised Person**") after (i) you (or the Authorised Person) have been notified of the purposes for which the Personal Data is collected, and (ii) you (or the Authorised Person) have provided written consent to the collection, use and disclosure of your Personal Data for those purposes.
- 2.2 You agree that we may collect, use or disclose or otherwise process your Personal Data for some or all of the following purposes and/or other purposes that we may notify you of in writing or as permitted by law (the "**Purposes**"):
 - (a) to operate, maintain, manage and provide our Services to you, which shall include membership benefits and services, employability services;
 - (b) to send you marketing information about our Services including notifying you of our marketing events, initiatives and promotions, lucky draws, membership and rewards schemes and other promotions;
 - (c) to process your payment and credit transactions;

- (d) to obtain feedback and assist you with your enquiries as part of our Services;
- (e) for the provision, development and the improvement of our Services provided to you;
- (f) to monitor, track and analyse user activity and demographic data, including but not limited to trends and usage of our Services;
- (g) where it is necessary for our legitimate interests (or those of a third party), except where such interests outweigh any adverse effect on your interests;
- (h) it is necessary for us to enter into or perform contractual obligations with you, whether in the course of or in connection with the provision of our Services;
- (i) to evaluate and improve our Services to ensure operational efficiency;
- (j) to ensure safety and security of our Services;
- (k) to conduct relevant know-your-client and anti-money laundering and countering the financing of terrorism checks;
- (l) to comply with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority; and
- (m) any other incidental business purposes related to or in connection with the above.

2.3 In addition, we may disclose your Personal Data:

- (a) to our related corporations, and our subsidiaries and affiliates (which includes joint venture partners, other corporations that we control or that are under common control with us) ("**Group**"), in which case we will require our Group to honor this Privacy Policy; and
- (b) to third party service providers, agents, our partner companies and other organisations ("**Third Parties**") we have engaged or partner with to perform any of the functions listed in clause 2.2 above for us. We do not control how these Third Parties manage the information they gather or handle and store the information that you provide to them. Please read and review their relevant terms and policies carefully before making your data available to them.

2.4 The Purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under any contract with you).

3. YOUR RIGHTS

3.1 Under certain circumstances you have the following rights under Singapore's Personal Data Protection Act 2012 (No. 26 of 2012) ("**PDPA**") in relation to your Personal Data. You have the right to:

- (a) **Withdraw consent at any time.** You may withdraw any consent given to the processing of your Personal Data by us at any time for any or all of the Purposes listed above by submitting your request via our contact details set out below. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our Services to you and we shall, in such circumstances, notify you before completing the processing of your request.

Upon receipt of your request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving the same.

Please note that the withdrawing consent does not affect our right to continue to collect, use and disclose Personal Data where such collection, use and disclose without consent is permitted or required under applicable laws.

- (b) **Request access to the information we hold about you.** You may submit a request to us for access to (i) some or all of your Personal Data that is in our possession or under our control; and (b) information about the ways we have used or disclosed your requested Personal Data in the past year;
- (c) **Request correction of the Personal Data that we hold about you.** You may submit a request to us to correct any incomplete or inaccurate data we hold about. We may need to verify the accuracy of the new information you provide us and thereafter, we will take all appropriate and reasonable steps to communicate the corrected Personal Data to each recipient to whom we disclosed the Personal Data (for example, our Third Parties who process the data on our behalf), unless Third Parties do not need the corrected information for any legal or business purpose. We aim to correct your Personal Data within thirty (30) calendar days from the time you make a request and if this is not possible, we will inform you of time required for our response.

4. PROTECTION OF PERSONAL DATA

- 4.1 To safeguard your Personal Data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection and encryption to secure all storage and transmission of Personal Data by us, and disclosing Personal Data both internally with our employees) and to our Third Parties are only on a need-to-know basis.
- 4.2 You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures. Further, we have in place notification procedures to deal with any suspected data breach that (i) could result or is likely to result in significant harm to the users to whom the data breach relates, or (ii) is, or is likely to be, of a significant scale. We will notify you and any applicable regulatory of a breach where we are legally required to do so as soon as we have made an assessment of the data breach.

5. MANAGING YOUR PERSONAL DATA

- 5.1 **Updating and maintaining the accuracy of your Personal Data.** We take all reasonable measures to ensure that your Personal Data is accurate, complete and up-to date. We generally rely on Personal Data provided by you (or the Authorised Person). In order to ensure that your Personal Data is current, complete and accurate, please update your account information in the Payd Application.
- 5.2 **Retention of your Personal Data.** We may retain your Personal Data for as long as it is necessary to fulfil the legal and business purposes for which it was collected, used and disclosed, or as required or permitted by applicable laws, unless longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). No purpose in this Privacy Policy will require us to retain your information for longer than the period of time in which users have an account with us. Upon your request to terminate your account, we will deactivate or delete your account, and delete or anonymise your Personal Data in our databases. However, we may retain some information (such as

request logs) to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Service and other policies, and/or comply with applicable legal requirements.

6. DATA TRANSFERS

We generally do not transfer your Personal Data to countries outside of Singapore. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your Personal Data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

7. CHANGES TO PRIVACY POLICY

7.1 We will update this Privacy Policy when necessary to reflect changes in our Services or legal requirements. When we post the updated Privacy Policy, we will revise the “Effective Date” at the top of the Privacy Policy.

7.2 If there are material changes to the Privacy Policy or in how we will use your Personal Data, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification through your Payd Application. We encourage you to periodically review this Privacy Policy to learn how we are processing your Personal Data.

7.3 If you do not agree with any changes to our Privacy Policy and do not wish your Personal Data to be subject to our revised Privacy Policy, you shall cease to use our Services, and deactivate your account. Your continued use of our Services after the effective date shall constitute your acceptance and agreement that all information collected from or about you on or through our Services after our revised Privacy Policy becomes effective and you will be subject to the terms of our revised Privacy Policy.

8. CONTACT US

We have appointed a data protection officer who is responsible for overseeing your queries in relation to this Privacy Policy. If you have any questions or suggestions about our Privacy Policy, including any requests to exercise your legal rights, please do not hesitate to contact our data protection officer using the details set out below:

Address	68 Circular Road #02-01, 049422, Singapore
E-mail address	support@justpayd.com

9. GOVERNING LAW AND JURISDICTION

Nothing in this Privacy Policy shall limit your rights under the PDPA. This Privacy Policy shall be governed by the laws of the Republic of Singapore and you agree to submit to the exclusive jurisdiction of the Singapore courts.