



## Privacy Policy

Eone General Trading Pte.Ltd.(“Eonefx”) is fully committed to safeguarding your privacy online or otherwise and the success of our business depends upon our ability to maintain the trust of our clients. This Privacy Policy aims to provide a summary of the type of personal information that we collect, how such information is used, transferred/disclosed and stored.

### (A) DATA COLLECTION

Generally, we collect two types of information from our clients and/or users of our website, including:

- Personal information, which includes but is not limited to name, residential address, identification and/or passport number, date of birth, email address, employment details, information relating to financial circumstances, investment experience (collectively “Personal Data”); and
- Traffic pattern information relating to the users on our website.

Personal Data is collected at the time when you apply for a Eonefx trading account (this would include a demo account as well) and/or through any other communications that you may have with our representative(s) during the course of their relationship with us. Personal Data may also be collected through any registrations, subscriptions or sign-ups that may be available through our website from time to time. Eonefx will limit the collection of Personal Data to what is necessary in order for us to provide you with required products and services.

Eonefx may also collect other information from time to time, such as through surveys used for research and feedback purposes in our efforts to continuously improve on the quality of our services and the products we offer. Personal Data collected online may be consolidated with other information provided to Eonefx by you through other means.

Information may also be collected indirectly from monitoring or other means such as recording of telephone calls and archiving of electronic records (including but not limited to emails). In these circumstances, the information is not accessed on a continuous or routine basis, but may be used for compliance or security purposes.

Traffic pattern information includes information on webpages accessed by users, and number of users who frequent our website and/or our trading platform(s), etc. Such information is anonymous and only used in an aggregated form. We also collect information through ‘Cookies’, which are further explained below.

### (B) PURPOSE FOR COLLECTION, PROCESSING AND DISCLOSURE OF PERSONAL DATA

#### Collection

Generally, Personal Data and aggregated information collected are used for the following purposes:

- To provide our products and/or services to and for managing our relationship with our clients, which shall include:
- the execution or administration of any transaction(s) requested and/or authorised by our clients;
- the maintenance, servicing and/or termination of our clients’ accounts;



- To enhance the content and user experience of our website and to notify you of such enhancements/upgrades/updates;
- To disseminate/distribute, research reports, analyses, commentaries, articles or newsletters;
- To disseminate/distribute information for marketing purposes about product and/or services offered that are similar or related to the products and/or services provided or previously provided to you. (Do note that you are always able to contact us to stop receiving such information via the unsubscribe facility.);
- To conduct client surveys and/or similar activities for the purposes of improving the provision of our services to our clients;
- For legal and compliance reasons on our part under applicable local and foreign laws, which shall include:
  - conduct of due diligence procedures for opening of accounts and ongoing monitoring purposes;
  - other monitoring and compliance procedures in line with our internal risk management procedures, audit/financial accounting and for management reporting purposes;
  - execution of bank withdrawals and/or deposits;
  - enforcement of legal rights;
  - where information is to be disclosed to law enforcement agencies and other relevant authorities for crime prevention and detection purposes;
- Responding to, handling, and processing queries, requests, applications, complaints and feedback from you;
- Any other purpose for which you have provided the information; and
- Any other incidental business purposes related to or in connection with the above.

## **(B) PROCESSING AND DISCLOSURE**

Please note that Eonefx may share, process and disclose Personal Data where (i) such disclosure is required for performing obligations in the course of or in connection with our provision of services requested by you, or (ii) to third party service providers, agents and other organizations we have engaged to perform any of the functions listed above. This includes but is not limited to circumstances such as:

- disclosure to our parent company and/or group companies, who are permitted to use, process and/or disclose Personal Data for a valid business or legal purpose, such as;
- the execution or administration of any transaction(s) requested and/or authorised by our clients;
- the maintenance, servicing and/or termination of our clients' accounts;
- disclosure to business partners, third party service providers, agents or other organizations on a need-to-know basis who would be bound by confidentiality obligations and/or are subject to personal data protection laws disclosure to Eonefx ' legal counsels, accountants, auditors and any other professional consultants;
- disclosure to persons with legal/beneficiary interest to the client's account, including persons who are acting in a fiduciary, authorised representative and/or legal capacity;
- disclosure as required by law and/or any applicable legal requirement(s) (including towards the prevention of any fraudulent, illegal or unlawful transaction, claim or liability) to governmental, regulatory and/or law enforcement agencies and/or in compliance with any judicial process and assistance rendered for any legal and/or regulatory investigations;



Please note that Eonefx may also share and/or disclose non-personal in aggregate or anonymized form with third party service providers for business purposes. Eonefx does NOT share, process or disclose Personal Data to business partners or third party service providers for marketing purposes.

### **(C) TRANSFER OF PERSONAL INFORMATION OVERSEAS**

To the extent that Eonefx may need to transfer Personal Data outside of Singapore (such as for data storage, data management and/or consolidation purposes), whether to our parent company, group companies, business partners or third party service providers or to data storage facilities, we shall do so in accordance with the PDPA and ensure that the standard of protection provided to Personal Data so transferred is comparable to the protection required under the PDPA.

### **(D) CONSENT**

Eonefx (including its employees, directors and/or representatives) is required by law to keep Personal Data strictly private and confidential and, save and except as set out in this Privacy Policy, we will not collect, use or disclose any Personal Data without having obtained your prior consent to do so, unless otherwise permitted by law.

Generally, when Eonefx requests for Personal Data in the course of providing you a service and/or product and where you provide us with such Personal Data, there is implied consent that you agree to provide us with your Personal Data in order for us to provide you with the requested service and/or product.

In some circumstances and as required by applicable law, we will seek your express consent when collecting your Personal Data. This is particularly where fresh consent is required for a new purpose in which your Personal Data will be used.

By providing Personal Data relating to a third party (such as (but not limited to) information of your spouse, children and/or parents) to us, you represent and warrant that the consent of that third party has been obtained for the collection, use and/or disclosure of the Personal Data for the purposes listed here.

You may withdraw your consent at any time by contacting us. However, please note that if you withdraw your consent to any or all purposes set out in this Privacy Policy and depending on the nature of your withdrawal request, this may (materially or otherwise) affect the way in which Eonefx is able to provide its service(s) and/or product(s) to you. Depending on the complexity of your request and the impact on our relationship with you, we may require reasonable time for us to process your request 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.

### **(E) RETENTION**

Personal Data will be held for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable law. Eonefx shall cease to retain Personal Data or remove the means by which Personal Data can be associated with you, as soon as it is reasonable to assume that the purpose for which that Personal Data was collected is no longer valid and retention is no longer necessary for legal or business purposes.



## **(F) ACCURACY, ACCESS AND CORRECTION**

Eonefx is committing to ensuring that your Personal Data is as accurate and up-to-date as possible. You may contact us at any time if you wish to correct, amend or update your Personal Data or business information (for our corporate clients). You may should contact either your account representative (if applicable) or [support@eonefx.com](mailto:support@eonefx.com)

## **(G) ACCESS RIGHTS**

You are also entitled to certain access rights to your Personal Data. To make a request, please contact us by mailing us; where upon your request will be acknowledged and acted upon generally within thirty (30) days of receipt of such request. If for any reason, we are unable to accede to your request, you will be notified accordingly.

Please note that Eonefx is entitled to charge a reasonable administrative fee for this service which you will be advised of prior to us acting upon the request.

## **(H) SECURITY SAFEGUARDS**

Eonefx has in place various security procedures, technical and organizational measures to safeguard your Personal Data. To protect against external attacks, we have in place robust firewalls and security measures to detect, isolate and prevent against hacking and other malware intrusions to our IT systems.

Further, Eonefx employees also undergo periodic security awareness programmes to create awareness in information security so that employees are able to identify and respond appropriately to security risks.

We use all reasonable efforts to safeguard your Personal Data. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any Personal Data which is transferred from you or to you via the Internet. You should also be mindful that you are responsible for keeping your access rights confidential and secure at all times.

## **(I) EFFECT OF AND UPDATES TO THE PRIVACY POLICY**

This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your Personal Data by us.

This Privacy Policy is amended from time to time or as and when it is required. Such changes to our Privacy Policy shall apply from the time that the same is posted on this website. Your continued use of our website will be taken as acceptance of the updated Privacy Policy, but we will seek your fresh consent before we collect more Personal Data from you or if we wish to use or disclose your Personal Data for new purposes.

## **(J) USE OF COOKIES**

Eonefx uses cookies to collect information. A cookie is a text file made up of letters and numbers that allow us to distinguish your browser/device from another user's browser/device. This text file is stored on your computer's hard disk for the purpose of keeping records when you visit a website.



Currently, we make use of cookies to help manage the site and your user experience. These cookies may be used to collect analytics of non-personal user activity outlines, manage personal preferences, provide relevant or timely information to you or offer focused advertisements.

Cookies set across our site, which include third party cookies, can be in the form of session or persistent cookies, and may use different technologies, such as JavaScript or Flash. If you would like to 'opt out' of the cookies set by our site, this can be accomplished on a cookie-by-cookie basis subject to your browser settings. In doing so, you may find that it may limit site operation or functionality. Eonefx does not use cookies to retrieve information which was not originally sent in a cookie. We do not use information transferred through cookies for any direct promotional or marketing purposes without your consent.

#### **(K) GOVERNING LAW**

This Privacy Policy has been drafted solely in accordance with the laws of Singapore. We do not represent or warrant that this Privacy Policy complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Policy as such.

#### **(L) CONTACT US**

If you have any comments and/or questions about this Privacy Policy or if you wish to make a specific complaint relating to our collection, use and/or disclosure of your Personal Data, please contact us as follows:

Subject/Reference: Privacy Policy

Attention: Data Protection Committee

Email: [support@eonefx.com](mailto:support@eonefx.com)

Address: 101 CECIL STREET #23-11 TONG ENG BUILDING SINGAPORE (069533)

#### **(M) DISCLAIMER**

Our website and/or our communications with you may contain links to other websites. Please note that the policy does not cover any external third party websites that may be accessed through links provided on our website and/or through our communications with you. We are not responsible for the privacy practices of such other websites and advise you to read the privacy statements of each website you visit which collects Personal Data.