LIRUNEX

TRANSPARENT · SAFE · TRUSTWORTHY

PRIVACY POLICY (LFSA)

(Lirunex Limited)

Revision Date: 20 May 2024

PRIVACY POLICY

LIRUNEX LIMITED, a legal entity registered as an Labuan International Business and Financial Centre under registration number LL16130 and regulated by the Labuan Financial Services Authority under license number MB/20/0050 and having its registered address at No.1-23A, First Floor, Paragon, Jalan Tun Mustapha, 87008 Labuan F.T., Malaysia (hereinafter referred to as the **"Company"** or **"us"** or **"we"**), on the one part, and the Client who will register for a trading account with the Company (hereinafter referred to as "you"), on the other part, and set out the terms and conditions under which the provision of Investment Services, Activities and Ancillary Services will be provided.

1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE

This privacy policy aims to give you information on how LIRUNEX LIMITED collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements any other privacy notices and is not intended to override them.

CONTROLLER

LIRUNEX LIMITED is the controller and responsible for your personal data.

We have appointed a data protection officer (hereinafter referred to as "the DPO") who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

CONTACT DETAILS

Our full details are:

LIRUNEX LIMITED authorised and regulated by the Labuan Financial Services Authority (LFSA) with License number: MB/20/0050 and regsitered address at No.1-23A, First Floor, Paragon, Jalan Tun Mustapha, 87008 Labuan F.T., Malaysia

www.lirunex.asia

Full name of legal entity: LIRUNEX LIMITED
Email address: support@lirunex.com
Postal address: No.1-23A, First Floor, Paragon, Jalan Tun Mustapha, 87008 Labuan F.T., Malaysia

You have the right to make a complaint at any time to Labuan Financial Services Authority. We would, however, appreciate the chance to deal with your concerns before you approach the Commissioner so please contact us in the first instance.

LEGAL FRAMEWORK

The privacy policy was established in line with the General Data Protection Regulation which has entered into force on 21 January 2020 and sets out most of your rights under such Regulation.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during the establishment of business relationship with us.

THIRD-PARTY LINKS

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and we are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you, and also your Transaction History Data.

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- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data as per the relevant Law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as Personal Data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

IF YOU FAIL TO PROVIDE PERSONAL DATA

In the course of our business, when there is a need to collect personal data by Law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to provide our services to you or to perform the contract we have. In this case, we may stop to provide our services to you, but we will notify you accordingly, if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;

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- enter a competition, promotion or survey; or
- give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Technical Data from analytics providers such as Google based outside the EU.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the Law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to provide our services to you or to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the following email: info@lirunex.com

MARKETING

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

PROMOTIONAL OFFERS FROM US

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

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You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered our website for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

THIRD-PARTY MARKETING

We will get your express opt-in consent before we share your personal data with any company outside LIRUNEX LIMITED group of companies for marketing purposes.

OPTING OUT

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time at the following email address: support@lirunex.com

COOKIES

The Company may use cookies to give the best possible experience when visiting the Company's website, to help improve the website's services, and to further optimize its functionality and improve security.

"Cookies" are small pieces of information that are transferred to your browser and stored on your computer's hard drive. The website requests the web browser create a small text file with a small amount of information, which it can access whilst you are viewing the website.

The Company may use a session cookie without which the website could not perform the website function. They are set automatically when pages load. A session cookie files are stored temporarily in your browser and only exists whilst you are reading or navigating the website. When you close the web browser these cookies are removed. Session cookies are never written on the hard drive of your computer and they do not collect any information from your computer.

The Company may use a persistent cookie to optimize the website by storing your preferences. It records information about choices you have made and allow us to provide more personal features. For example, if you set your location, username, password, text size, we use cookies to save these preferences. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites. Persistent cookie remains in the hard drive on your computer until erased by the user or until they expire. The Company may use persistent cookies for example, by storing your preferences on your account page and remembering if you have visited the site before so that the messages intended for first-time users are not displayed to you.

The Company may use a performance cookie. This cookie shows how visitors use a website, for

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instance which pages visitors go to most often, and if they get error messages from web pages. These cookies don't collect information that identifies a visitor. All information collected by these cookies are aggregated and therefore anonymous. It is only used to improve how the website works and to provide the Company with statistical information about the site. It includes activities like counting page visits, dwell time, technologies used to access the site, and page load speeds.

You can always refuse cookies on your computer by changing the browser settings. How you do this depends on the browser you're using. If you use more than one browser, you must delete cookies in each browser.

You can visit the following websites for information of how you can delete and control cookies that are stored on your computer:

https://www.aboutcookies.org

Be aware that if cookies are disabled, some functionality may become unavailable to you, because they rely on the website to remember your choices.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the following email: support@lirunex.com

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purpose of carrying out our services, but should this be the case we check the issue.

We require all third parties to respect the security of your personal data and to treat it in accordance with the Law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your

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personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data: see ***Request erasure*** below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- **Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to

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object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

- **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine - readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

AMENDMENTS TO THE POLICY

The Company reserves the rights to review and amend this privacy policy from time to time and notify you of any such amendments accordingly by posting an uploaded version of this privacy policy on the Company's website.

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