

# **UAG TRADE ASIA CO., LTD**

## **Privacy Policy**

## I Introduction

**UAG TRADE ASIA CO., LTD**, Company Number **00031021**, is a Private Limited Company registered in Cambodia with its registered office at **#A10, St R8, Village 1, Sangkat Srah Chok, Khan Daun Penh, Phnom Penh, Kingdom of Cambodia**. **UAG TRADE ASIA Co., LTD** is authorized and regulated by the Securities and Exchange Commission of Cambodia (“SECC”) under Derivative Broker License Number **014/SECC/DB**

This Privacy Policy outlines how **UAG TRADE ASIA Co., Ltd** collects, uses, manages and discloses your personal information, and ensures that it remains confidential and secure. Your use of the Company’s website(s) constitutes acceptance of the terms of this Policy.

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology and any changes to our operational processes, and any amendments to this Policy will be incorporated in an updated version on this page. Your subsequent use of the website constitutes acceptance of those changes. Any information we hold will be governed by our most recent Privacy Policy.

## II Collection of Personal Information

1. We only collect personal information when it’s reasonably necessary for us to do business with you. We use your personal information to:
  - (a) Verify your identity;
  - (b) Provide you with the products and services that you’ve asked for;
  - (c) Help us monitor, evaluate and develop our products and services;
  - (d) Enable secure access to our client area;
  - (e) Unless you tell us otherwise, keep you informed about our products and services and those of our relevant business and initiative partners, and tailor this information to your needs and interests;
  - (f) Respond to any feedback, queries or complaints;
  - (g) Provide you with technical support;
  - (h) Participate in any third-party acquisition or potential acquisition of an interest in us or our assets;
  - (i) Comply with our legal obligations under the applicable laws; and

- (j) Take measures to detect and prevent fraud, crime or other activity which may cause harm to our business or our products and services.

## 2. Information we may collect

### 2.1 The personal information we collect about you generally includes the following:

- (a) Name;
- (b) Date of birth;
- (c) Postal or email address; or
- (d) Phone numbers, including home, mobile and work;
- (e) Fax number;
- (f) Information relating to an individual's source of wealth;
- (g) Occupation;
- (h) Credit card details;
- (i) Bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
- (j) Information relating to your trading experience;
- (k) Identification documentation, as required under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 ("AML/CTF Act"), including:
  - (i) Passport;
  - (ii) Driver's license;
  - (iii) National identity card;
  - (iv) Utility bills;
  - (v) Trust deed;
- (l) A Veda Check or other credit or bankruptcy check; and/or
- (m) Other information we consider necessary to our functions and activities.

2.2 We're required by law to identify you if you're opening a new account or adding a new signatory to an existing account. The AML/CTF Act requires us to sight and record details of certain documents (i.e. photographic and non-photographic documents).

2.3 Where necessary, we also collect information on the following individuals:

- (a) Trustees;
- (b) Partners;
- (c) Company directors and officers;
- (d) Officers of co-operatives and associations;
- (e) Client's agents;
- (f) Beneficial owners of the client; and
- (g) Persons dealing with us on a "one-of" basis.

2.4 We may take steps to verify the information we collect. For example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a credit application is accurate.

3. We may either collect personal information about you directly from you or from sources other than you when permitted under the AML/CTF Act. "Sources other than you" may include your agents, family members, friends, related entities, affiliates or divisions. We may also collect information from you electronically, for instance, when you visit our web-site.

4. Incomplete or inaccurate information

4.1 If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services that you ask for.

5. Consent

5.1 In most cases, we'll obtain your consent to use and disclose your personal information for our intended purposes either before or at the time that we collect it.

5.2 If you don't give us your consent or withdraw your consent, we may not be able to provide you with the products or services you ask for.

6. Withdrawing consent

6.1 You can withdraw your consent at any time. To withdraw your consent, please email [uagradeasia@uagkh.com](mailto:uagradeasia@uagkh.com) in the first instance.

### III INTEGRITY OF YOUR PERSONAL INFORMATION

#### 1. Quality of personal information

- 1.1 We ensure that the personal information we collect and handle is accurate, up to date, complete and relevant.
- 1.2 Please contact us if any of the details you have provided to us change or if you believe that the information, we have about you isn't accurate or up to date.
- 1.3 We may also take steps to update the personal information we hold, for example, an address, by collecting personal information from publicly available sources such as telephone directories or electoral rolls.

#### 2. Security of personal information

- 2.1 We're committed to protecting the personal information we hold about you from misuse, unauthorized access and disclosure.
- 2.2 We've implemented a range of practices and policies to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.
- 2.3 Anyways, you should note that the security of Internet e-mail is uncertain. By sending sensitive or confidential e-mail messages which are not encrypted you accept the risks of such uncertainty and possible lack of confidentiality over the Internet. The Internet is not 100% safe and someone may be able to intercept and read your details.

### IV USE OR DISCLOSURE OF PERSONAL INFORMATION

#### 1. Who we disclose personal information to:

- 1.1 We may share your information with our related entities and third parties that we outsource functions to or partner with, in certain limited situations where it's necessary for us to provide our products and services or perform associated business activities.
- 1.2 These entities and third parties include:
  - (a) Brokers and agents who refer your business to us;
  - (b) Our third-party business partners or joint initiative providers;
  - (c) Auditors we appoint to ensure the integrity of our operations;

- (d) Any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- (e) Your employment referee (to confirm details about you);
- (f) If required or authorized to do so, regulatory bodies and government agencies;
- (g) Credit reporting agencies;
- (h) Other financial institutions and organizations that you seek credit from them (at their request, so that they may assess whether to offer you credit); and
- (i) Other organizations who assist us to provide products and services by performing functions such as client contact, banking, payments, data processing, debt recovery, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement our products and services.

2. Disclosure required by law

- 2.1 We'll also disclose your personal information if we're required by law or permitted to do so under the Privacy Act.

## **V DIRECT MARKETING**

Unless you've asked us not to, we may use your personal information to let you know about new or improved products and services and special offers that may be of interest to you. If you don't want us to use your personal information for marketing purposes, please call us on +855 69 211 629, email to us at #A10, St R8, Village 1, Sangkat Srah Chok, Khan Daun Penh, Phnom Penh, Kingdom of Cambodia, or unsubscribe email notification from us.

## **VI COOKIES**

- 1. A cookie is a small file which asks permission to be placed on your computer's hard drive. If your computer settings allow cookies, then the file is added and the cookie helps analyses web traffic or lets the site owner know when you visit a particular site.

2. Cookies help us provide you with a better website by enabling us to monitor the pages that you find useful and tailor our website to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns, and doesn't identify you or anyone else as an individual.

We may disclose the data we collect through cookies to our related companies.

3. Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

## **VII CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION**

Some of our related companies and third parties that we share information with may be located outside of Cambodia. These entities may be located in the United Kingdom, the United States, Thailand, China, Russia and other countries. We'll only disclose your personal information to an offshore recipient once we have taken reasonable contractual.

## **VIII ADOPTION, USE OR DISCLOSURE OF GOVERNMENT IDENTIFIERS**

1. We won't adopt a government related identifier (such as your driver's license number) as our own identifier unless required or authorized to do so under a Cambodian law, regulation or court/tribunal order.
2. Before using or disclosing a government related identifier, we'll ensure that such use or disclosure is:
  - (a) Reasonably necessary for us to verify your identity for the purposes of doing business with you; or
  - (b) Reasonably necessary for us to fulfil our obligations to a government agency or a State or Territory authority; or
  - (c) Required by or authorized under Cambodian law, regulation or a court/tribunal order; or
  - (d) Within a permitted general situation
  - (e) Reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

## **IX ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION**

1. If you've provided us with personal information, you have the right to request to access or correct it.
2. Requests for access to or correct limited amounts of personal information, such as checking to see what address or telephone number we have recorded, can generally be handled over the phone.
3. We'll respond to your request as soon as we're able to. In some cases we may ask you to pay an administrative fee to cover costs associated with your request. We'll confirm the cost with you and confirm that you want to proceed before actioning your request.
4. We'll endeavor to comply with your request as soon as we can after hearing from you. To help us respond, please include as much detail as possible about the information that you want to access or correct and, if relevant, how you'd like to access the information.
5. We'll always confirm your identity before providing you with access to your personal information.
6. In some circumstances we might have to deny your request for access or correction, or limit the access we provide. In either of these situations, we'll let you know the reasons for our decision in writing. If you disagree with our decision, you can make a complaint following the process set out in section J of this Policy.
7. If you have any questions or would like further information about our privacy and information handling practices, please contact us using one of the following channels:
  - (a) Email: [uagtradeasia@uagkh.com](mailto:uagtradeasia@uagkh.com); or
  - (b) Phone: **+855 69 211 629**; or
  - (c) Post: **UAGTRADE ASIA CO., LTD #A10, St R8, Village 1, Sangkat Srah Chok, Khan Daun Penh, Phnom Penh, Kingdom of Cambodia.**