

SUNRATE PRIVACY POLICY (v3.0)

SUNRATE is a global payment and treasury management platform. We empower companies worldwide with our cutting-edge proprietary platform, extensive global network, and robust APIs to operate and scale both locally and globally.

This Privacy Policy is designed to provide information about how we collect, use, manage, update, display, transmit, retain, disclose, share, protect, delete, or otherwise process (collectively, "**process**") personal data when we provide our Services, so you can continue to trust SUNRATE to handle your personal data in a fair, secure, and lawful manner.

This Privacy Policy also outlines your rights and choices as a data subject, as well as the ways in which you may contact us regarding the processing of your personal data. Please ensure that you read and fully understand it.

This Privacy Policy applies to all Services provided by SUNRATE entities globally. Any SUNRATE entity may act on behalf of other SUNRATE entities in entering into this Privacy Policy with you, and all SUNRATE entities will process personal data in accordance with this Privacy Policy.

We are committed to fully complying with all applicable legal and regulatory requirements regarding personal data. If mandatory laws or regulations require processing beyond the scope of this Privacy Policy, we will adjust our practices accordingly to meet those obligations.

If you have any questions about how we use your personal data, you can get in touch by the method set out in *Section 13 (Data Protection Officer)* of this Privacy Policy.

1. Scope of Policy

1.1. This Privacy Policy applies to you when you use or interact with SUNRATE Services worldwide, including our website, mobile app, or other channels (collectively, "**Sites**"). "**SUNRATE Service**" and "**Service**" refer to any products, services, devices, technologies, functionalities, and applications provided by SUNRATE entities, as may be updated from time to time. Capitalised terms used but not defined in this Privacy Policy shall have the meanings given to them in the User Agreement.

1.2. Depending on the context, as a data subject, "**you**" might be a **Business Customer, Representative, Individual Customer, End User, or Visitor**:

- You are a "**Business Customer**" if you are a business entity to which we provide our Services directly.

- You are a **"Representative"** if you are an individual who owns, controls, or acts on behalf of a Business Customer, such as its director, officer, employee, authorised signatory, or ultimate beneficial owner.
- You are an **"Individual Customer"** if you are an individual who directly enters into an agreement with us or uses SUNRATE Services in your personal capacity for your own personal or business purposes, where such Services are provided directly to you rather than through a Business Customer.
- You are an **"End User"** if you do business with, or otherwise transact with, a Business Customer through SUNRATE Services (for example, when you make or receive a payment via a Business Customer that uses SUNRATE for payment processing), but are not directly contracting with SUNRATE or using the Service.
- You are a **"Visitor"** if you are an individual who visits our Sites or otherwise interacts with us without logging into a SUNRATE Account or using our Services.

1.3. By providing us with another data subject's personal data, you confirm that you have their consent and that they are aware of and agree to our processing of their personal data under this Privacy Policy.

2. Data Controller and Data Processor

2.1. As used in this Privacy Policy, **"we"**, **"us"**, **"our,"** and **"SUNRATE"** refer to the SUNRATE entity that acts as a **"data controller"** or **"data processor"** regarding your personal data. The SUNRATE entity responsible for your data may vary depending on your location, the entity you used to enter into an agreement with SUNRATE, the product or Service you use with us, and whether SUNRATE is acting as a controller or a data processor. For certain products, SUNRATE may act as a data controller, a data processor, or both.

2.2. Depending on the nature of the processing activity and our relationship with you, SUNRATE may act as an independent data controller, a joint data controller with third parties (such as financial institution partners or co-licensed entities in certain jurisdictions), or simultaneously as both a controller and a processor in the same service interaction.

2.3. Where SUNRATE acts as a data controller, it determines the purposes and means of processing your personal data and is responsible for ensuring such processing complies with applicable data protection laws, including maintaining appropriate technical and organisational measures and honouring your data subject rights. This Policy applies to all processing activities carried out by SUNRATE in its capacity as a data controller.

Please visit our [Regulatory Information Page](#) for details of SUNRATE data controllers and their contact information.

- 2.4.** Where we process personal data on behalf of a Business Customer, partner, or other third-party controller in connection with the Services, we act as a processor and process such personal data in accordance with their documented instructions, the applicable agreement, and applicable law. In these cases, the relevant controller's privacy policy, rather than this Policy, governs its collection and use of personal data relating to End Users and other individuals whose data it provides to us, and that controller remains responsible for providing appropriate privacy notices and obtaining any required consents.

This Policy continues to apply to SUNRATE's processing activities carried out in its capacity as a controller, including those related to service administration, security, compliance, and operation of the platform.

- 2.5.** SUNRATE entities also provide local support services in certain countries where SUNRATE operates. These entities may act as data processors on behalf of SUNRATE, depending on the jurisdiction. SUNRATE, as the Data Controller, remains responsible for ensuring that any such data processors process personal data only in accordance with SUNRATE's instructions and applicable data protection laws.

3. Types of Personal Data We Collect

Personal data refers to any information that directly or indirectly allocates your identity, such as your name, address, telephone number, email address, date of birth, payment card information, bank account information, and any other information that is associated with your identity.

This Section provides different types of personal data we collect from you.

3.1. Information Directly Provided by You

You may provide personal data to us directly when you apply for, use, or interact with the Services, including contact details, account and profile information, identity verification information, payment and beneficiary information, communications with us, and any other information you choose to provide in connection with the Services.

3.1.1. Information Necessary for SUNRATE Services

To use or interact with SUNRATE Services, you need to provide certain personal data to us, including, but not limited to, contact details; information required to

establish an account profile; identity verification information; financial information; and information regarding beneficiaries of payments. Some of this information is required by law, including information needed for identity verification, anti-money laundering, sanctions screening, fraud prevention, and related compliance purposes; some is required for us to enter into or perform our contract with you and to provide the Services.

This information is necessary for us to perform the contracted Services and to comply with our legal obligations. If you are not able or willing to provide this information, we may not be able to provide you with all the requested Services. This may include, for example, being unable to create or maintain your account, complete identity verification or compliance checks, process transactions, or otherwise provide certain features of the Services.

3.1.2. Optional Information

Some information you provide to us is optional and not mandatory; such information may be provided through your response to our surveys, feedback about our Services, participation in promotions or contests, or your communication with us.

This information allows us to provide you with incentives or additional features, evaluate our performance, and improve your experience with the SUNRATE Service. This additional information will be processed based on our reasonable discretion, applicable legal basis, or, when applicable, your consent.

3.2. Information Automatically Collected When You Use SUNRATE Services

Certain personal data is automatically collected from you when you use the Services or visit any of our Sites, and we have a legitimate interest (such as preventing fraud or misuse, understanding your use of, and improving our Services) in doing so. This may include, but is not limited to, transaction data, beneficiary information, card-related information, usage data, device information, recordings, log data, and location information.

3.3. Information Provided by Third Parties

We may also receive your personal data from third parties, including but not limited to, business and financial partners, payment service providers, service providers, financial institutions, fraud prevention partners, public registers, publicly available sources, and Business Customers through whom you access SUNRATE Services. We may combine this information with personal data collected directly from you for the purposes set out in this Privacy Policy. Such collection and sharing will also be described in the relevant third parties' own privacy policies or other information provided to you.

3.4. Information Technologies We Use

We use technologies (i.e., cookies, web beacons, pixels, ad tags, and device identifiers) to recognise you, prevent fraud and secure our systems and network, and to customise your online experience. To learn more about the cookies we may utilise, please refer to our Cookie Policy.

4. Categories of Personal Data and How We Process Them

4.1. This section provides a detailed list of categories of personal data we collect from you to illustrate how we process it.

Personal Data		Data subject	Source of data	Purpose of Processing	Legal basis
SUNRATE Account and profile information	Name, email address, phone number, date of birth, account credentials	Representative; Individual Customer	Provided by Representative or Individual Customer	SUNRATE Account creation, customer relationship management, service provision	Contract performance; Legitimate interests
Identity verification information	Passport, national ID, driver's licence, proof of address, verification photos	Representative; Individual Customer	Provided by Representative, Individual Customer, or a verification service provider	Identity verification, AML compliance, regulatory screening	Legal obligation; Legitimate interests
Business entity information	Company name, company registration number, corporate structure, shareholder information	Representative	Provided by Representative or obtained from public registries	Merchant onboarding, compliance checks, business relationship management	Legal obligation; Contract performance
Transaction information	Transaction amount,	Representative; Individual	Generated during payment	Payment processing,	Contract performance;

	transaction date, merchant details, payment reference	Customer; End User	transactions	settlement, reconciliation, financial reporting	Legal obligation
Payment instrument information	Bank account details, card information, billing address	Representative; Individual Customer; End User	Provided by Representative, Individual Customer, or payment partners	Payment execution, settlement, transaction authentication	Contract performance
Beneficiary information	Recipient name, recipient bank	Representative; Individual Customer; End User	Provided by Representative, Individual Customer	Payment execution and settlement	Contract performance
Device and technical information	IP address, device identifier, browser type, operating system	Representative, Individual Customer; End User, or Visitor	Automatically collected from devices or systems.	Fraud detection, system security, service operation	Legitimate interests
Usage and activity information	Login records, system activity logs, platform usage data	Representative, Individual Customer; End User, or Visitor	Generated through the use of Services	Platform performance monitoring, analytics, and service improvement	Legitimate interests
Communication information	Emails, customer support tickets, call recordings	Representative; Visitor; Individual Customer; End User	Provided during communications with us	Customer support, complaint handling, dispute resolution	Contract performance; Legitimate interests
Location information	IP-based location, device location data	Representative, Individual Customer; End User, or Visitor	Automatically collected from devices.	Fraud prevention, security monitoring	Legitimate interests

Marketing information	Marketing preferences, survey responses, and event participation information	Representative; Individual Customer; End User; Visitor	Provided by Representative, Individual Customer; Visitor	Marketing communications, event administration, and product improvement	Consent; Legitimate interests
Cookies and tracking data	website usage tracking	Representative, Individual Customer; End User; Visitor	Automatically collected through website technologies	Functionality, analytics, and advertising measurement	Consent; Legitimate interests

Where we rely on legitimate interests as the legal basis for processing, we have assessed that your interests or fundamental rights and freedoms do not override our interests. This includes processing carried out for the purposes of fraud prevention, financial crime detection, service security, and service improvement.

4.2. In certain limited circumstances, we may process special categories of personal data or other sensitive personal data where permitted by applicable laws and regulations. Such processing will only take place where it is necessary to provide our Services, to comply with legal or regulatory obligations, or where you have provided your explicit consent, as required by applicable law. We implement appropriate safeguards to protect such data and ensure that it is processed in accordance with applicable data protection laws.

5. Sharing of the Data and International Transfer

5.1. We may share your personal data with third parties or affiliates only where necessary. If you would like further information about the third parties to whom we may transfer personal data, the jurisdictions in which they are located, or the safeguards and contractual arrangements used for international transfers, you may contact us at dpo@sunrate.com.

Receiving Parties	Why We Share it	Notes
SUNRATE Entities	To facilitate or support the provision of the Services, we may disclose your personal data to other members of the SUNRATE Group for operational support, customer	All SUNRATE entities will only process personal data in accordance with the applicable intra-group data sharing arrangements governing such

	support, technical services, service improvement, fraud prevention, compliance and related internal business purposes.	processing and for the purposes set out in this Privacy Policy.
Banks, Financial Institutions, and Third-Party Payment Service Providers	We may share your personal data where necessary to initiate, process, route, clear, or settle transactions, provide account-related services, or otherwise support the payment services you request.	This may include personal data contained in payment instructions or related transaction records, to the extent required for the relevant payment flow. These recipients may process such data as independent controllers or in accordance with their own regulatory obligations.
Third-Party Platforms and Integration Partners	We may share personal data where necessary to enable the use of SUNRATE Service Codes, facilitate the receipt of funds, support platform integrations, or otherwise enable the relevant partner-enabled functionality you request.	Such sharing is limited to the personal data reasonably necessary for the relevant integration or platform functionality. These partners are required to handle personal data in accordance with applicable data protection laws and any applicable contractual restrictions.
Third-party Service Providers, including Anti-money Laundering (AML), Identity Verification, Sanctions Screening, and Compliance Service Providers	We may share personal data with service providers that assist us in fraud prevention, identity verification, sanctions screening, anti-money laundering, counter-terrorist financing, compliance monitoring, investigations, and related risk management activities.	These providers process personal data only to the extent necessary to perform the services we request, subject to appropriate contractual and security obligations.
Third-party Service Providers, including Technology, Security and Cloud Infrastructure Providers	We may share personal data with technology service providers where necessary to host, support, secure, maintain, or improve our Services and related systems.	These providers are engaged under appropriate contractual arrangements and may not use personal data for their own purposes except as permitted by applicable law.
Government Authorities, Regulatory	We may disclose personal data where required or permitted by	Any such disclosure will be made only to the extent

Bodies, Law Enforcement Agencies, Judicial Authorities, or Other Competent Authorities	applicable law, including to comply with legal or regulatory obligations, respond to lawful requests, court orders, subpoenas, or regulatory inquiries, and prevent, detect, or investigate unlawful activity or threats to security.	required or permitted by applicable law and in accordance with our internal procedures. In some cases, we may be prohibited from notifying you of the disclosure.
Authorised Users	Where a Representative or Individual Customer authorises other users to access or manage SUNRATE Services, or where a user makes or receives a payment through SUNRATE Services, certain personal data may be visible to authorised users as necessary to operate the SUNRATE Account or complete the relevant transaction.	Such visibility is limited to the personal data reasonably necessary for the relevant account administration or transaction activity.
Professional Advisers, Auditors, and Corporate Transaction Counterparties	We may disclose personal data to our professional advisers, auditors, insurers, financing counterparties, or prospective buyers, sellers, investors, or other counterparties in connection with audits, financing, restructuring, mergers, acquisitions, disposals, or other corporate transactions.	Any such disclosure will be subject to appropriate confidentiality protections and carried out following applicable data protection laws. Where required by law, affected individuals will be informed.

5.2. Certain SUNRATE Services may be provided by our affiliates, personnel, or third parties located in other jurisdictions (such as intermediary banks or beneficiary banks). Accordingly, we may need to transfer your personal data to countries or regions outside the country or region where you are located in order to provide you with our services:

5.2.1. As we operate globally, your personal data may also be processed in other jurisdictions where SUNRATE entities or our service providers are located.

5.2.2. When transferring personal data to other countries or regions, we will implement appropriate safeguards to ensure compliance with applicable laws and regulations governing such transfers. In particular, where the laws and regulations of the destination country or region provide a lower level of protection than those of your country or region, we will take appropriate measures to ensure that your personal data remains adequately protected and is processed in accordance with this Privacy Policy.

5.2.3. Where applicable laws and regulations require the use of a specific mechanism for the transfer of personal data, we will implement appropriate measures, including:

- transferring personal data to countries or recipients recognised as providing an adequate level of protection under applicable laws and regulations;
- entering into standard contractual clauses (SCC), International Data Transfer Agreement (IDTA), or any equivalent standard contracts issued by relevant authorities with the relevant recipients; or
- using other lawful transfer mechanisms permitted under applicable laws and regulations.

You may contact us at dpo@sunrate.com to request information about the safeguards applicable to international transfers of your personal data, including, where appropriate, a copy or summary of the relevant transfer mechanism, subject to applicable legal and confidentiality restrictions.

In limited circumstances where a transfer of personal data to another jurisdiction cannot rely on an adequacy decision, standard contractual clauses, or other recognised transfer mechanisms under applicable laws and regulations, we may rely on your explicit consent for such transfer where permitted by law. In such cases, we will inform you of the potential risks associated with the transfer due to the absence of an adequate level of data protection in the destination jurisdiction.

5.3. To the extent permitted by applicable laws and regulations, you acknowledge and agree that the third parties with whom we share your personal data, and any subsequent recipients with whom such third parties further share the information, may process the personal data in accordance with this Privacy Policy.

6. Data Retention

6.1. Locations, Purposes and Periods

We primarily store your personal data in Hong Kong and Singapore. We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected. Certain information, including but not limited to regulatory-related information (such as information required for anti-money laundering and counter-terrorist financing purposes), will be retained for no less than ten (10) years in accordance with applicable regulatory requirements, unless a longer retention period is required under applicable laws and regulations.

For other categories of personal data, retention periods are determined based on the nature of the data and the purposes for which it was collected, taking into account

applicable legal and regulatory requirements.

6.2. Deletion and Disposal

Where applicable laws and regulations, or the jurisdictions in which we operate, no longer require the retention of the relevant personal data, or where you have withdrawn your consent and we have no other legal basis to continue processing such data, we will delete or otherwise dispose of such information. These processes may be carried out automatically, and you do not need to contact us to request deletion.

6.3. Deletion and Disposal Methods

Deletion or disposal shall be carried out in a manner that ensures the personal data is rendered permanently irrecoverable, and may include physical destruction of storage media, permanent erasure or secure overwriting of electronic records, anonymisation or pseudonymisation, rendering re-identification no longer reasonably possible, or such other methods as are recognised under applicable laws and regulations.

Where deletion is carried out by a third-party service provider, we will ensure that appropriate contractual obligations are in place to verify that the data has been securely deleted in accordance with our instructions.

6.4. Exceptions to Deletion

We may retain your personal data even after you cease to use our Service or request deletion of your personal data. Examples of such cases include:

- 6.4.1. To process transactions initiated before the relevant SUNRATE Account was closed or deactivated.
- 6.4.2. To comply with applicable anti-money laundering requirements and other applicable laws and regulations.
- 6.4.3. To detect, prevent or investigate fraud and other loss prevention matters.
- 6.4.4. To comply with legal process, court orders, or requests from law enforcement authorities.
- 6.4.5. To recover any fees or other amounts due and owing by you to us.
- 6.4.6. To satisfy our tax, accounting, financial and regulatory reporting obligations.
- 6.4.7. Where necessary to comply with our contractual obligations to third-party partners.
- 6.4.8. To resolve disputes or to establish, exercise, or enforce our rights under relevant service agreements or other applicable agreements or policies.
- 6.4.9. To take any other action or exercise any other rights as permitted or required by applicable law.

Where we retain your personal data following a deletion request based on one or more

of the exceptions set out above, we will limit our processing of such data to the extent necessary for the applicable purpose. We will not use it for any other purpose.

7. Your Rights and Choices

You may have certain rights under applicable data protection laws in relation to your personal data. The availability and scope of these rights may vary depending on the laws applicable in your jurisdiction. Please refer to *Appendix I (Country/Region Specific Provisions)* for specific privacy rights applicable in your country or region.

If you do not directly use SUNRATE Services, you may exercise your data subject rights by contacting us directly at dpo@sunrate.com, and we will respond in accordance with applicable laws and regulations.

7.1. Access and Correction

You may have the right to request access to the personal data we hold about you and to request that inaccurate or incomplete personal data be corrected or updated.

We may need to verify your identity before responding to such requests. In certain circumstances, applicable laws may allow or require us to refuse or limit access to personal data. For example, where providing access would adversely affect the rights of another individual or where the information is subject to legal privilege or other legal restrictions.

7.2. Erasure

You may have the right to request that we delete or remove personal data that we hold about you in certain circumstances.

However, this right may be subject to certain legal limitations. For example, we may retain personal data where it is necessary to comply with legal or regulatory obligations, resolve disputes, enforce agreements, or for other legitimate business purposes permitted under applicable laws.

7.3. Restriction of Processing

You may have the right to request that we restrict the processing of your personal data in certain circumstances. We will also inform any third party to whom we have disclosed relevant personal data to stop the processing upon your request to us.

Where processing is restricted, we may store your personal data, but we will not otherwise process it unless permitted by applicable laws or with your consent. Where we

intend to resume processing your personal data after a restriction has been lifted, we will notify you in advance and, where required by applicable law, obtain your consent before doing so.

7.4. Data Portability

Where provided by applicable laws, you may have the right to receive certain personal data you have provided to us in a structured, commonly used, machine-readable format, and to request that such data be transmitted to another service provider where technically feasible, with certain exceptions. This includes any personal data we process either based on your consent or as necessary to perform our contract with you, such as transaction-related data. We will provide you with additional details if you request them.

7.5. Objection

Where permitted by applicable laws, you may have the right to object to our processing of your personal data where the data processing relies on the basis of legitimate interests or undertaking a task in the public interest.

7.6. Withdrawal of Consent

Where we rely on your consent to process your personal data, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

Upon withdrawal of consent, we will cease processing your personal data for the relevant purposes as soon as reasonably practicable. Where we no longer have a legal basis to retain such data, we will delete or dispose of it in accordance with the deletion methods described in *Section 6 (Data Retention)* of this Privacy Policy.

7.7. Exercising Your Rights

If you wish to exercise any of the rights described above, please get in touch with us at dpo@sunrate.com. We may request additional information from you to verify your identity before processing your request.

Where permitted by applicable data protection laws, you may also have the right to lodge a complaint with a competent data protection authority or supervisory authority if you believe that our processing of your personal data violates applicable laws.

8. Application and Updates of the Privacy Policy

8.1. This Privacy Policy (including its main body, the Appendices), the content on SUNRATE's

Sites, transaction enquiries, transaction receipts, and the information processing provisions contained in the relevant service agreements, together constitute the entire agreement between SUNRATE and you regarding the processing of information.

- 8.2. In order to reflect changes in applicable laws and regulations, the way you use the SUNRATE Services, or the manner in which we process personal data, we may revise this Privacy Policy from time to time and will notify you where appropriate.

9. Security

- 9.1. We implement and maintain appropriate technical, physical, and procedural safeguards designed to protect your personal data against loss, misuse, and unauthorised access, disclosure, or alteration. These safeguards include measures such as actively maintained firewalls, up-to-date anti-virus software, encryption protocols, and restricted physical access controls to our servers.
- 9.2. In the event of a personal data breach, we will take prompt steps to contain and remediate such breach. Where required by applicable laws and regulations, we will notify the relevant supervisory authority and, where the breach is likely to result in a high risk to your rights and interests, affected individuals, within the timeframe prescribed by applicable law. We will also maintain internal records of all personal data breaches in accordance with our legal obligations.

For the purpose of this Privacy Policy, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed by us.

10. Marketing

Where permitted by applicable laws and regulations, we may send you marketing or promotional communications about our products, services, or offers that may be of interest to you. Where required by applicable law, we will obtain your consent before doing so. You may withdraw your consent or opt out at any time by following the unsubscribe instructions in the communication or by contacting us using the contact details provided in this Privacy Policy. We will not share your personal data with third parties for their own marketing purposes without your consent.

11. Children's Privacy

- 11.1. Where we collect, use, or disclose personal data relating to a child, we will do so in accordance with applicable law and, where required, obtain the consent of the parent, guardian, or person having legal custody of the child.
- 11.2. If we become aware that personal data relating to a child has been collected without the required consent or other valid legal basis, we will take appropriate steps in accordance with applicable law, including obtaining the required consent or deleting such personal data where appropriate.

12. Automated Decision-making and Artificial Intelligence

We may use automated decision-making and profiling in limited circumstances, including for fraud screening, sanctions screening, and risk scoring during onboarding or transaction processing, using inputs such as your identity details, transaction patterns, and third-party data. Where we use your personal data for such purposes, including profiling, that produces legal or similarly significant effects on you, we will obtain your explicit consent where required by applicable law. Possible outcomes of such processing include delays, requests for additional verification, or account access restrictions. We do not rely solely on automated decision-making to produce legal or similarly significant effects unless permitted by applicable law and subject to appropriate safeguards. Where required by law, you have the right to request human review and to contest any such decision by contacting us at dpo@sunrate.com.

We may also use artificial intelligence tools and other automated technologies in connection with our Services, including for search and retrieval functions, customer support, operational support, compliance, and service improvement. These tools may assist users or our personnel in accessing information, generating summaries, or supporting workflows, but do not necessarily involve automated decision-making about individuals. We apply appropriate internal governance and human oversight to our use of AI tools to help ensure that such use remains consistent with applicable law and this Privacy Policy. Where required by applicable law, you may have the right to information about how AI tools affect the processing of your personal data and to seek human review of any output that significantly affects you, by contacting us at dpo@sunrate.com.

13. Data Protection Officer

We have appointed a Data Protection Officer ("DPO") to oversee matters relating 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 contact details provided below:

SUNRATE Data Protection Officer
Email Address: dpo@sunrate.com

Revised on 24 April 2026

Effective on 28 April 2026

Appendix 1

Country/Region Specific Provisions

Singapore

Access and Correction

Where the *Personal Data Protection Act 2012* of Singapore (“**PDPA**”) applies, you may request access to your personal data in our possession or control, as well as information about the ways in which your personal data has been used or disclosed by us within the preceding twelve (12) months, subject to any exceptions under applicable law.

You may also request correction of your personal data. Under PDPA, if your personal data is corrected, we will send the corrected personal data to other organisations to which we disclosed the personal data within the preceding year, unless you agree that such corrected personal data need not be sent to those organisations, or an exception applies.

Withdrawal of Consent

Where we rely on your consent, you may withdraw that consent on reasonable notice. Upon receipt of your withdrawal request, we will inform you of the likely consequences of such withdrawal and will cease collecting, using, or disclosing your personal data for the relevant purposes, unless otherwise permitted or required by law.

Contact and Complaints

For questions or requests relating to the PDPA, please get in touch with our Data Protection Officer at: dpo@sunrate.com. If you have concerns about how we handle your personal data, please contact our Data Protection Officer first. If you are not satisfied with our response, you have the right to raise your concern with the Personal Data Protection Commission of Singapore.

Data Breach Notification

In addition to our general breach notification practices, where required under the PDPA, we will notify the Personal Data Protection Commission within three (3) calendar days after making the assessment that a breach is notifiable, and notify affected individuals as soon as practicable.

Hong Kong

Data Access Requests

We will respond to a data access request within the timeframe required under *the Personal Data (Privacy) Ordinance (Cap. 486) ("PDPO")* (generally within forty (40) days). Where permitted under the PDPO, we may charge the applicable fee for processing a data access request.

Data Correction

You may request correction of personal data that you believe is inaccurate. Where we are satisfied that the personal data is inaccurate, we will make the necessary correction within the timeframe required by applicable law (generally within forty (40) days). If we are unable to comply with the request, we will inform you of the reasons within the same period and comply as soon as practicable thereafter.

Contact and Complaints

If you have any questions or concerns regarding our handling of your personal data in Hong Kong, you may contact us at: dpo@sunrate.com. You also have the right to lodge a complaint with the Office of the Privacy Commissioner for Personal Data (PCPD) in Hong Kong.

United Kingdom

Automated Decision-Making

We may use automated systems and profiling tools in connection with fraud prevention, anti-money laundering, sanctions screening, and identity verification. Where, under UK data protection law, a decision concerning you is made solely by automated means, without human involvement, and produces legal or similarly significant effects, you may have the right to obtain human intervention, express your point of view, and contest the decision.

International Transfers

Where we transfer your personal data outside the United Kingdom, we will do so in accordance with applicable UK data protection laws. Such transfers will be subject to appropriate safeguards, including reliance on adequacy regulations made under the UK GDPR, the use of the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, or such other transfer mechanisms as may be recognised under applicable UK data protection laws.

Contact and Complaints

If you have any questions or concerns regarding our handling of your personal data in the United Kingdom, please contact us at dpo@sunrate.com. You also have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk.

Malaysia

Right of Access and Correction

Under the Malaysian Personal Data Protection Act 2010 ("**Malaysian PDPA**"), we may charge the applicable fee for responding to a data access request, where permitted by law. To protect your privacy and security, we may require information reasonably necessary to verify your identity and, where applicable, to locate the personal data requested before processing an access or correction request.

Sensitive Personal Data

We process sensitive personal data only where we have obtained your explicit consent, or where such processing is otherwise permitted under applicable law, including in limited circumstances recognised by law. Where applicable, we implement additional safeguards for the processing of such data.

Your Rights under the Malaysian PDPA

In addition to the rights set out in this Privacy Policy, you may also have the right to require us to cease, or not begin, processing your personal data where such processing is causing, or is likely to cause, substantial and unwarranted damage or distress to you or another person.

Contact and Complaints

For questions or requests regarding the Malaysian PDPA, please get in touch with our Data Protection Officer at dpo@sunrate.com. If you are not satisfied with our response, you may refer your complaint to the Department of Personal Data Protection (Jabatan Perlindungan Data Peribadi) at www.pdp.gov.my.

Appendix 2

Cookie Policy

1. Introduction

This Cookie Policy explains how SUNRATE ("**SUNRATE**", "**we**", "**us**", or "**our**") uses cookies on our websites, mobile applications, and other digital channels that link to this Cookie Policy (collectively, the "**Sites**").

Please read this Cookie Policy together with our Privacy Policy, which explains how we collect, use, disclose, and otherwise process personal data, your rights in relation to your personal data, and how you can contact us.

Where required by applicable laws and regulations, we will obtain your consent before placing non-essential cookies or similar technologies on your device. You may manage your preferences through the cookie banner or Cookie settings made available on the relevant Site.

Where cookies involve the processing of personal data, you may have rights under applicable data protection laws. For more information about your rights and how to exercise them, please see our Privacy Policy or contact our Data Protection Officer.

2. What Are Cookies?

Cookies are small text files that are placed on your browser, computer, mobile device, or other device when you visit a website. Cookies allow a website to recognise your device and store certain information about your preferences or past actions.

We may also use similar technologies, such as web beacons, pixels, tags, SDKs, scripts, local storage, and session replay or analytics tools, where applicable. For ease of reference, we refer to all such technologies in this Cookie Policy as "**cookies**", except where the context otherwise requires.

Cookies may be:

- First-party cookies, which are set directly by SUNRATE, or
- Third-party cookies, which are set by third parties that provide services to us or enable certain features on the Sites.

Cookies may also remain on your device for different periods of time:

- Session cookies, which expire when you close your browser; and
- Persistent cookies, which remain on your device until they expire or are deleted.

Where required by applicable law, persistent cookies will not be retained for longer than necessary for their stated purpose.

3. Categories of Cookies We Use

We may use the following categories of cookies on the Sites:

3.1. Necessary Cookies

These cookies are strictly necessary for the operation of the Sites and to provide services requested by you. They may include cookies used to:

- maintain network and information security;
- authenticate users and prevent fraudulent or unauthorised access;
- enable core website functionality;
- support session management and load balancing;
- remember privacy settings or cookie preferences.

Necessary cookies are always active because, without them, the Sites or requested services may not function properly. Where applicable law permits, we do not require your consent for these cookies.

3.2. Functional Cookies

These cookies are not strictly necessary. Where required by law, we will ask for your consent before placing these cookies on your device. If you do not consent, or later withdraw your consent, some personalised features may not function as intended. These cookies allow the Sites to remember choices you make and provide enhanced, personalised features, such as:

- language preferences;
- region or country selection;
- login state;
- user interface preferences.

If you turn off these cookies, some features or personalisation may not function as intended.

3.3. Analytics Cookies

These cookies help us understand how the Sites are used, including which pages are visited, how users navigate, how long sessions last, and whether technical issues occur. We use this information to improve the Sites, services, and user

experience.

Depending on the tools deployed on the Sites, analytics cookies may be provided by third-party analytics providers or by us. Where required by applicable laws and regulations, we will use analytics cookies only with your consent, unless an exemption applies under applicable law.

3.4. Advertising and Marketing Cookies

These cookies may be used to:

- record your visits to the Sites, the pages you have viewed, and the links you have followed;
- deliver advertisements more relevant to your interests;
- measure the effectiveness of advertising campaigns;
- help us understand whether marketing communications or advertisements are effective;
- support remarketing through third-party advertising platforms.

These cookies may be set by us or by third-party advertising, social media, or analytics partners. Where required by applicable laws and regulations, we will only use these cookies with your consent.

4. Third-party cookies

Cookies and similar technologies used on the Sites are currently first-party only. We do not currently permit third parties to set cookies through the Sites or to collect personal data through cookies or similar technologies on the Sites. The cookies we use are session cookies and are automatically deleted at the end of your browsing session.

5. How you can manage cookies

You have the right to accept or reject non-essential cookies. We provide equal prominence to accepting and rejecting cookies.

5.1. Cookies Banner

When you visit our Sites, you will see a cookie consent banner. You may: 1) Accept all cookies; 2) Reject all non-essential cookies; or 3) Customise your preferences by category. We will retain your cookie preferences for an appropriate period and will ask you to refresh them where required by applicable law or where our use of cookies materially changes.

5.2. Cookie settings on our Sites

You may update or withdraw your consent at any time by accessing Cookie settings. You may also accept, reject, or customise your preferences for non-essential cookies at any time. Withdrawing consent does not affect the lawfulness of processing carried out before withdrawal.

5.3. Browser controls

Most browsers allow you to block or delete cookies through their settings. Please note that blocking all cookies may affect the functionality of the Sites. For guidance, please consult your browser provider's help pages.

6. International data transfers

As SUNRATE operates globally, information collected through cookies may be processed by our service providers or us in jurisdictions outside the country or region where you are located. Where required by applicable laws and regulations, we will implement appropriate safeguards for such transfers. For more information about such safeguards, please see *Section 5 (Sharing of the Data and International Transfer)* of the Privacy Policy.

7. Changes to this Cookie Policy

We may update this Cookie Policy in the same manner as we update the Privacy Policy from time to time to reflect changes in law, technology, our Sites, or our business practices.

8. Contact us

If you have any questions about this Cookie Policy or our use of cookies and similar technologies, please contact:

SUNRATE Data Protection Officer
Email: dpo@sunrate.com