

PayBitoPro

Personal Data Protection Policy

(SINGAPORE)

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Introduction and Purpose

To help PayBitoPro comply with the protection of personal data and relevant laws and regulations in Singapore where the users of PayBiroPro reside and operate, PayBitoPro's best practice of Data Protection Regulation which is subject to relevant amendments as and when such amendment takes place is shown in this policy. Data Protection Regulation is a regulation in Singapore on data protection and privacy for all individuals within the limits of territory of Singapore.

In this Policy "we", "us", "our" means PayBitoPro and the terms "user", "individuals", "non-individuals" means the residents of Singapore and the business enterprises registered in Singapore under Companies Act, 1967 where the users of PayBitoPro reside and operate.

The Data Protection Policy is uniformly applicable to all Users intending to utilize the Services or gain advantages from the Online Platforms of PayBitoPro, constituting an integral element of the User Terms and Conditions. Before engaging with the Online Platforms or divulging any personal information, it's imperative to thoroughly examine this Data Protection Policy. Your use of the Online Platforms implies your explicit acknowledgment and adherence to the User Terms and Conditions and, consequently, this Data Protection Policy.

The purpose of PayBitoPro's Data Protection Compliance policy is to ensure that the customers of PayBitoPro get their privacy protected invariably by protection of their personal data and information. Data Protection Policy of PayBitoPro optimises and enhances transparency and accountability in processing of the valuable data and



specifics provided by the customers, giving greater control of their personal data and sensitive information.

Scope

PayBitoPro's Data Protection Policy applies both to the processing of personal data taking place within the periphery of Singapore and even outside the territories of Singapore if the customer or Controller is residing in the State and carrying out business or working for gain relating to processing personal data inside and outside the State for the purpose of the Organization's statutory functions or in other purposes provided for in pursuance of proper discharge of the functions of the Organization or for detection and prevention of serious crime or criminal proceedings, following the data protection principles and PayBitoPro makes sure that the information is used fairly, legally and transparently for specified and explicit purposes in a way that is adequate and accurate, notwithstanding that the information is relevant and limited to only what is necessary. Record retention techniques at PayBitoPro retains relevant information of the customers involved in a transaction for a maximum period of five years from the date of completion of the transaction and/or after off-boarding¹. PayBitoPro also ascertains that there is a strong legal protection by its legal team for

¹ Paragraph 9.3 of the NOTICE TO PRESCRIBED FINANCIAL INSTITUTIONS FINANCIAL SERVICES AND MARKETS ACT 2022 issued under section 28H(1) and item 3 of Part 2 of the Third Schedule of the Financial Services and Markets Act 2022 ("FSM Act")



more sensitive information like race, ethnic background, political and religious opinions and beliefs, genetics, trade union membership and sex life or orientation, and most pertinently, setting separate safeguards and measures for personal data relating to criminal convictions and offences.

Principle of Data Protection Policy

With the unerring adherence to Personal Data Protection Regulations of PayBitoPro which is applicable in Singapore, the Compliance Team at PayBitoPro is responsible for compliance regarding the Personal data of the customers of PayBitoPro² in a manner if that is:

- processed legally, without prejudice and in a transparent manner,
- the said information and data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- the information is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- accurate and, where necessary, kept updated;

² FATF Recommendation on information sharing (2016-2017)



- every reasonable step is taken to ensure that personal data that are inaccurate in terms of the purpose for which that was collected are erased or rectified in an expeditious manner;
- the data is kept in a form which permits identification of customers for no longer than is necessary for the purposes for which the relevant personal data are processed;
- the data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Types of Data collected³

While using the services provided by PayBitoPro, certain Personal Data are collected which can be used to identify or contact the customers. The Personal Data may include, but is not limited to:

³ FATF (2016-2017), Consolidated FATF Standards on Information Sharing



1. Name
2. Address
3. Place and Date of birth
4. National Registration Identity Card (NRIC)⁴ or Passport number
5. Email
6. Phone number
7. Account password

The Employment Information of the Customers is also collected in the subsequent steps like

1. Industry
2. Occupation
3. Source of Funds
4. Employment Category
5. Employment Type
6. Annual Income
7. Net Worth
8. Transaction Volume
9. If the Applicant is a Politically Exposed Person (PEP) or not

⁴ Section 9 of the National Registration Act 1965



10. Purpose of the account
11. Current Banking Partner
12. How long the Applicant had that banking relationship

The applicant and/or customer shall have to also provide and upload the following documents and information via mobile applications or web browsers.

1. One of the government-issued identity documents bearing the individual's photograph, an identification number and date of birth
2. Passport or National Registration Identity Card (NRIC)
3. National Identity Card
4. Driver's License
5. Proof of residence issued within the last three months.
6. Real-time live selfie of themselves
7. Industry and occupation.

When the customer uses the services provided by PayBitoPro by or through a mobile device or web in regards to crypto exchange, PayBitoPro collects, retains, uses, or stores data or information automatically certain information automatically, including, but not limited to, device verification, gathering the IP address of the device used by the customers, accessing the photo gallery/media/files/camera and user's other apps and services including messaging through SMS and usage data, tracking the location from where the customer has logged in, the type of browser used by the customer and the device ID, browser type, browser version, unique



device identifiers, and the time and date of visit during login using local storage. User's device information is also collected including but not limited to IMEI or equipment identification number, IMSI or subscriber identification, MAC address, Android version, device details, network operator, contact list information, Wifi / Data Network connectivity.

PayBitoPro also collects information that the browser sends whenever the customer visits the PayBitoPro site to login or when the customer accesses the services provided by PayBitoPro through a mobile device.

In terms of website handling, PayBitoPro uses cookies and tracking technologies like Google Analytics. In terms of cookies, PayBitoPro uses cookies like:

- Necessary/Essential cookies which provide the customers with services available through the Website and to enable the customers to use some of the features of PayBitoPro. These cookies help to authenticate users and prevent fraudulent use of user accounts.
- Notice acceptance cookies identify if users have accepted the use of cookies on the PayBitoPro Website.
- Functionality cookies which allow PayBitoPro to remember choices the customer makes when the customers use the PayBitoPro website, such as remembering the login details or language preference.
- Tracking and performance cookies which are used to track information about traffic to the PayBitoPro website and how users use the PayBitoPro website.



Processing of data relating to Criminal Conviction and Offences

PayBitoPro carries out security measures relating to processing of personal data pertaining to criminal convictions and offences under the control of official authority or when the processing is authorised by the Personal Data Protection Commission⁵ providing for appropriate safeguards for the rights and freedoms of the individuals. Any comprehensive register of criminal convictions are kept under the control of official authority only.

Use of Personal Data

PayBitoPro uses Personal Data of its customers for the following purposes⁶:

- To provide and maintain the Service fairly and transparently in addition to monitoring the usage of the service.
- To manage the Account of the customers in terms of the registration and login as a user of the service provided by PayBitoPro so that the personal data provided can give the customers access to different functionalities of the service that are available to them as a registered user.

⁵ Section 65 of the Personal Data Protection Act, 2012

⁶ Section 15A of Personal Data Protection Act, 2012



- For the performance of a contract encompassing the development, compliance and undertaking of the contract for the services the customer has obtained or of any other contract with PayBitoPro.
- To contact the customers by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide the customer with news, special offers and general information about other services and events which are offered by PayBitoPro unless the customer has opted not to receive such information.
- To manage the requests of the customers to PayBitoPro.
- PayBitoPro may use the customer information for other purposes like data analysis, identifying usage trends, determining the effectiveness of the promotional campaigns and to evaluate and improve the Service, products, services and marketing.
- It is to be noted that the personal information of the customers for any relevant purpose whatsoever are always disclosed with the consent of the customers.



Retention of Personal Data

PayBitoPro shall retain the Personal and Professional Data of the customers for as long as the account of the customers is active or as needed to provide services in accordance with FATF Recommendations and Personal Data Protection Act, 2012. The personal and professional data obtained by PayBitoPro for verification purposes before using and/or availing the services of PayBitoPro are kept throughout the continuance of business relationship with the customer and are retained for a tenure of at least five years after the conclusion of business relationship. PayBitoPro shall retain and use the Personal Data of the customers to the extent necessary to comply with the legal obligations, and for the purpose of enforcing the legal agreements and policies.

PayBitoPro keeps a copy of the data and information as well as sufficient supporting records of the transactions provided by the customers of PayBitoPro for fulfilment of its Customer Due Diligence (CDD) obligations for a period of five years following the completion of the transaction or the end of the business relationship. After the completion of the five-year tenure, the information and personal data of the customers is retained only either under an enactment or for the purposes of court proceedings, or the data of customers can also be retained by PayBitoPro if the concerned customer consents to such retention of data.⁷

⁷ FATF Recommendations 2012



PayBitoPro keeps staff training records at least for three years after the date of completion of such training.

The retention period may extend beyond the termination of business relationship with a customer only as long as it is necessary for PayBitoPro to have sufficient information to respond to any issues that may arise later, including but not limited to the purpose of investigations or ongoing prosecutions or in case of Suspicious transactions or if PayBitoPro requires the information for its records or to support legal proceedings, or if PayBitoPro believes in good faith that a law, regulation, rule or guideline requires it, but such archiving period of retaining information is always maintained within the five-year tenure of retention of data. However, the Retention of personal data of customers can be ceased in cases when the purpose for which the personal data was collected is no longer applicable or such retention is no longer necessary for business or legal purposes⁸. Nevertheless, PayBitoPro shall not be liable or responsible for the non-availability of information beyond the termination of business relationship with their clients.

⁸ Section 25 of Personal Data Protection Act, 2012



Disclosure of Personal Data

Law enforcement

Under certain exceptional circumstances, PayBitoPro shall disclose the Personal Data of the customers if required to do so by relevant laws of Singapore⁹ or in response to valid requests by supervisory authority namely Financial Action Task Force (FATF) or Personal Data Protection Commission.

Other legal requirements

PayBitoPro shall disclose the personal data and information of the customers in good faith that such action is necessary to either abide by a legal obligation, or for protection against legal liability and defence of PayBitoPro however deemed applicable by the Compliance team at Paybitopro.

For the purposes of disclosure of information, the disclosure shall be made by PayBitoPro only if the disclosure was made with the consent of the customer himself or by the legal representative of the customer carrying on the business of the

⁹ Section 18 of the Personal Data Protection Act, 2012



customer for the time being, or the information which was obtained by or provided to the Organization or representative as appointed by the Organization in the course or purposes of discharge of the Organization's functions, or for the purpose of making the data or information available to the public in relevant and respective manner or where the disclosure of information was made for the purposes of criminal or civil proceedings, or such disclosure was necessary in the public interest.¹⁰

Transfer of Personal Data

The information of the customers, including Personal Data, is processed at the operating offices of PayBitoPro and in any other places where the customer and PayBitoPro involved in the processing are located. Data Protection Regulation operating in Singapore is applicable in Singapore. Therefore, it implies that the relevant information may be transferred to and maintained on computers located outside of the state if approved by the Personal Data Protection Commission and the same shall be done after complying with PayBitoPro, including for onward transfers of personal data from the third country located outside the aforementioned jurisdictional borders or an international organisation to another country or international organisation. The consent of the customers followed by submission of such information represents the agreement and consent to such transfer¹¹. Transfer of data can even take place to a third country if the particular state or province has proper and coherent legislations addressing personal data protection of the customers

¹⁰ Section 14 and 20 of Personal Data Protection Act, 2012

¹¹ Section 26 of Personal Data Protection Act, 2012



including but not limited to significant provisions, measures, controls, stipulations and rules and the ability to exercise the personal rights of the customers from where the users of PayBitoPro reside and operate. PayBitoPro takes all reasonable steps necessary to guarantee that the data of the customers is treated securely and in accordance with this Policy and no transfer of Personal Data shall take place to an organisation or in the vicinity of any jurisdiction unless there are adequate controls in place including the security of the data and other personal information of the customers.

The transfer of personal data of customers shall be so applied that the level of protection of customers which is guaranteed by PayBitoPro is not undermined.

Security of Personal Data

Taking into account the purposes of processing personal data as well as the risk of deviating likelihood and severity for the rights and freedoms of customers of PayBitoPro, PayBitoPro implements appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including pseudonymisation¹² and encryption of personal data, the ability to ensure the

¹² Pseudonymisation and other encryptions shall be performed at the discretion of PayBitoPro, subject to the applicable and existing laws and regulations of the land.



ongoing confidentiality, integrity, and resilience of processing systems and services, the ability to restore the availability and access to personal data in an expeditious manner in the event of a physical or technical incident and incorporates a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of processing of personal data and information of the customers.¹³

The security of personal data of customers of PayBitoPro is held in highest regard and all kinds of chamber-tight security protocols are implemented and always in place, but it has to be borne in mind that no method of transmission or transfer of information over the internet, or method of electronic storage is 100% secure and are susceptible to malicious cyber attacks. Although PayBitoPro strives to use the prime means to protect the Personal Data of the customers, its absolute security is not guaranteed.

Legal Basis for Processing Personal Data under Data Protection Regulation

PayBitoPro processes personal data of customers under the following conditions:

- **Consent:** Where the customer has given his consent for processing personal data for one or more specific purposes.

¹³ Section 24 of Personal Data Protection Act, 2012



- **Performance of a contract:** Processing of Personal Data is necessary for the performance of an agreement with the customer or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with legal obligations to which PayBitoPro is subject.
- **Legitimate interests:** When processing of personal data becomes necessary for the purposes of the legitimate interests pursued by PayBitoPro.

In any of the aforementioned scenarios, PayBitoPro undertakes to clarify the specific legal basis which applies to the processing of personal data and information, and in particular whether the provision of Personal Data is a statutory or contractual requirement.

Rights of the Customer¹⁴

Under the Data Protection Policy framed and implemented strictly by PayBitoPro being a Centralised Crypto Trading Platform, the Customers have the right to find out what information PayBitoPro stores about them, including the right to:

- be informed about how the relevant data of the customers is being used
- have incorrect data replaced and updated with the correct information

¹⁴ Sections 21 to 24 of Personal Data Protection Act, 2012



- have data erased
- stop or restrict the processing of data
- object to how your data is processed in certain circumstances.

The data collection regulator of Singapore where the users of PayBiroPro reside and operate has the authority to delegate PayBitoPro with the responsibility for monitoring and enforcing their provisions relating to data protection. The various rights enforceable by the customer as per the Data Protection policy of PayBitoPro are as follows:

- **Rights of access** by the customer pertaining to the personal data concerning him or her whether being processed, and, where that is the case, access to the personal data and the relevant information.
- **Right to Information** of personal data where PayBitoPro is liable to provide information to the customer like the identity and the relevant contact details and information of PayBitoPro, the legal foundation and purposes for which the personal data of the customer is processed by PayBitoPro, the categories of personal data of the customer which is being processed, the categories of recipients of the personal data (if any) and any other information needed to secure that the personal data of customer is processed fairly and transparently.
- **Right of Rectification** by the customer who has the right to rectify the inaccurate personal data concerning him or her from the database of PayBitoPro. The customer also has the right to complete the incomplete



personal data, including providing a supplementary statement conditional to the purpose of processing the data of the customers.

- **Right to erasure** by the customer to obtain the erasure of personal data concerning him or her where either the personal data of the customer is no longer necessary in relation to the purposes for which they were collected or otherwise processed, or the customer withdraws consent on to the processing of his or her personal data for one or more specific purposes. Data deletion involves the secure and irreversible removal of data from all relevant storage locations involving the procedure of identification of data to be deleted, Verifying the deletion request and obtaining necessary approvals and using appropriate methods to securely delete data. PayBitoPro ensures documenting the deletion process of data for audit and compliance purposes. Customers may request complete deletion of their data by using the “Delete my data” button in the Settings of the PayBitoPro interface. Upon using this feature, the customer’s data goes immediately to the deletion queue from where it is automatically and permanently deleted at the end of the retention period, wherever applicable.
- **Right to request transfer of personal data** where the customer is entitled to receive the personal data provided to the organisation for processing when it is necessary for the implementation of a contractual obligation with the consent of the customer. Furthermore, the customers of PayBitoPro also have the right to request transfer of personal data to another organisation with the consent of the customer whenever technically feasible.



- **Right to object** on grounds relating to the particular situation of a customer, at any time to processing of personal data of the customer which is based either for public interest or for the purpose of any legitimate interest, including profiling. PayBitoPro shall process such personal data after providing legitimate grounds for the processing which supersedes the interests, rights and freedoms of the customer pertaining to the situation or for the establishment, exercise or defence of legal claims.

Exercising Data Protection Rights

The customers of PayBitoPro may exercise the rights of access, rectification, cancellation and opposition by contacting PayBitoPro. It must be noted that PayBitoPro may ask its customers to verify their identity before responding to such requests, but PayBitoPro shall strive to respond and reciprocate to any of such requests of its customers instantaneously. The customer shall have the right to complain to the Data Protection Authority which in the case of collection and use of personal data is the Personal Data Protection Commission.¹⁵

¹⁵ Sections 5 and 6 of the Personal Data Protection Act, 2012



Children's Privacy

There are no specific provisions in the Personal Data Protection Act regulating the processing of minors' data. But in relation to the processing of the personal data of a child at PayBitoPro, the processing of data shall be lawful where the child is at least 13 years old possessing sufficient understanding to consent on his own behalf as per the Advisory Guidelines of the Personal Data Protection Commission on the Personal Data Protection Act. However, PayBitoPro shall have the discretion to reject an application of a minor in cases when it has reason to believe or is found that a minor does not have sufficient understanding of the nature and consequences of giving consent. In such a scenario, consent is sought from the minor's parent or guardian on behalf of the minor.¹⁶

If a parent or legal guardian of a child is aware that his/her child has provided PayBitoPro with Personal Data without consent and/or approval, such parent or guardian is requested to contact the customer service executive of PayBitoPro at the first instance. If Personal Data from anyone under the age of 13 without verification of parental consent is collected, required steps are taken to remove that information from the servers of PayBitoPro.

¹⁶ Article 8 of Advisory Guidelines on the Personal Data Protection Act (PDPA) for selected topics in conjunction with PDPC's Advisory Guidelines on the PDPA for Children's Personal Data in the Digital Environment



Changes to Policy

PayBitoPro updates its privacy policy from time to time. Any changes whatsoever shall be notified to the customers of PayBitoPro by posting the new Privacy Policy on this page.

The customers are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page on the PayBitoPro Website.

Contact

For any query about this Policy, the contact information is given below:

- By visiting this page on the PayBitoPro website: [www.paybitopro.com]
- By sending an email: [compliance@paybitopro.com]

