

## Privacy Policy

### Introduction

1. We at CamelOne Pte. Ltd. ("**CamelOne**" or "**we**", "**us**", "**our**" as the case may be) respect the privacy and confidentiality of the personal data of our customers, partners, consultants, contractors, service providers, outsourced third-parties and others who have business dealings with us. We are committed to implementing policies, practices and processes to safeguard the collection, use and disclosure of the personal data you provide us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.
2. We have developed this document ("**Privacy Policy**") to cover the information practices, including how we collect, use, disclose, process or handle the personal data that you may provide in the course of the use of the website ("**Site**") and its functions available or facilitated by the Site (the "**Services**"), or in connection with your dealings with, through, or on the same.
3. For the purposes of this Privacy Policy:
  - a) "**personal data**" as referred herein means data, whether true or not, about an individual who can be identified — (a) from that data; or (b) from that data and other information to which the organization has or is likely to have access (which includes, for avoidance of doubt user credentials);
  - b) "**data intermediary**" means an organization which processes personal data on behalf of another organization but does not include an employee of that other organization; and
  - c) "**processing**" in relation to personal data, means the carrying out of any operation or set of operations in relation to the personal data, and includes any of the following: (a) recording; (b) holding; (c) organization, adaptation or alteration; (d) retrieval; (e) combination; (f) transmission; (g) erasure or destruction.
4. This Privacy Policy may be amended or updated from time to time, and the latest version will be posted at <https://tradefinance.vcargocloud.com> and take effect from the date and time of posting.
5. **Purposes for which personal data is collected, used, disclosed, processed or handled** – In respect of all personal data you provide to us (including on or through the Site or Services), you consent to the collection, use, disclosure, processing or handling, by us or our affiliates (including any data intermediary of ours, related companies or affiliates) of such personal data, for the following purposes:
  - a) responding to your queries, requests and feedback;
  - b) to maintain your account with us and process payments or verify your identity / entitlement to use the Site or Services or any part thereof;
  - c) to execute the operation, fulfilment, and administration of part of the Services or functions or features of the Site;
  - d) to facilitate the negotiation, entry and execution into various contracts with other users or make certain third party services available on or through the Site;
  - e) to communicate with you to inform you of changes to the Site or Services, or our policies, terms and conditions and other administrative information;
  - f) to comply with our obligations or enforce our rights in connection with the Site or Services;
  - g) to comply with any applicable law, judgment, order, code, standard or regulation and participate in (or co-operate with) legal, regulatory or administrative proceedings or directions;
  - h) to protect and safeguard the operation of the Site and Services including preventing, detecting, reporting and supporting / assisting in investigations into any crime (including fraud, theft,

money laundering, terrorism misuse or abuse of the Site or Services), cybersecurity incidences or risks, or any of the same where suspected;

- i) to conduct or facilitate audits for the purposes of meeting legal requirements, compliance or industry standards, or as may be desirable to enhance the standing, quality, scope and capacity of the Site or Services;
- j) to conduct data analytics, including (but not limited to) matching and profiling you to provide you with features and functions of the Site or the Services which may be relevant or of interest to you and to improve your user experience and for the purposes of enhancing the Site or Services or developing new product or service offerings; and
- k) such other purposes as may be reasonably related to the above.

For the purposes of (j), personal data will be aggregated and / or anonymized, such that no one individual can be identified or recognized from the user statistics in question. You acknowledge and agree that any anonymised data is not personal data and that we have the right to share and disclose such anonymized data with third parties for any purposes.

6. **Consents** – The use of this Site or Services, is subject to the condition that and you hereby warrant and represent to us that any personal data has been provided for any purposes stated in the Privacy Policy is with, at all times, full consent of the individual identified by the personal data (the “**data subject**”), such consent not having been revoked except where adequate and reasonable advance notice of the same has been given and duly acknowledged by us. You agree and acknowledge that the withdrawal of any consents may impact the ability to proceed with or use any of the Site or Services including our ability to comply with any obligations in connection with the Site or Services and such withdrawal of consent will be on the basis that you will release us from any obligations in connection with the same, and that you will indemnify us and hold us harmless from and against any claim, demand, loss, damage, cost, or liability (including reasonable legal fees) which we may suffer or suffers in connection with or arising from such withdrawal.
7. **Accuracy, Completeness and Updating of personal data** –The use of the Site or Services, is subject to the condition that and you hereby warrant and represent to us that any personal data has been provided for any purposes stated in the Privacy Policy is, at all times, accurate, complete, and kept up to date by you at all times. You can provide us with updates to any information in accordance with the terms of this Agreement.
8. **Your obligations to ensure security & confidentiality** – You are responsible for maintaining the security and confidentiality of any personal data provided or made available by or through you (including, without limitation, any user credentials) and where any of the Site is installed or accessed by you via any device, you agree that you will safeguard the access to the use of the same on that device by applying security measures as may be reasonably appropriate. For the avoidance of doubt, and with respect to any personal data provided by the Bank to CamelOne, nothing in this clause absolves CamelOne of its responsibility to comply with its security and confidentiality obligations under the Agreement and this Privacy Policy.”
9. **Transfers of your data / Data export** – In submitting personal data to us, the personal data may be transferred / exported to locations in other territories outside of your location for the purposes of data processing (as defined above) by third party data intermediaries (as defined above). We endeavour to do so in each instance in accordance with applicable laws, and require such data intermediaries to comply with all applicable laws and to provide an equivalent standard of protection for such personal data as such personal data would have received had the personal data remained in your territory. Such personal data may be stored in servers operated by third party service providers.
10. **Cookies / log files** - As with most other websites, we collect and use the data contained in log files. The information in the log files include your IP (internet protocol) address, your ISP (internet service provider), the browser you used to visit the Site, the time you visited the Site and which pages you visited throughout the Site. When you visit or interact with the Sites or Services, we or our

authorized service providers may use cookies, web beacons, and other similar technologies for collecting and storing information to help provide you with a better, faster, and safer web experience. Note that:

- a) A cookie is a small file containing a string of characters that is sent to your computer when you visit the Site for record keeping purposes. Cookies are stored in your browser's file directory, and the next time you visit the Site, your browser will read the cookie and relay the information back to the Site or element that originally set the cookie.
- b) Depending on the type of cookie it is, cookies may store user preferences and other information, such as how a visitor arrives at the Site, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page). There are several types of cookies: (i) session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session; (ii) persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites; (iii) first-party cookies are set by the Site; (iv) third-party cookies are set by a third party site separate from the Site.
- c) The use of cookies, web beacons and similar technologies by us on the Site have different functions. They are either necessary for the functioning of the Services, help us improve our performance, or serve to provide you with extra functionalities.
- d) Cookies can be disabled or removed by tools that are available in most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options. Deleting cookies does not mean you are permanently opted out of any advertising program. Unless you have settings that disallow cookies, the next time you visit a site running the advertisements, a new cookie will be added.
- e) We offer certain site features and services that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits. However, if you decline cookies or other similar technologies, you may not be able to take advantage of certain site features or services tools. For more information on how you can block, delete, or disable these technologies, please review your browser settings.
- f) What do we use cookies for?
  - i) For the purposes set out above in the Privacy Policy;
  - ii) To help speed up your future browsing activities and boost your overall user experience on the Site or Services;
  - iii) To enable the Site to operate, for example, cookies that enable you to log onto secure parts of the Site or use the Services;
  - iv) To track you as you navigate the Site and to enable the use of any features of the Site or Services (including, without limitation, e-commerce facilities);
  - v) We use cookies to personalise the Site or Services for you.

PRIVACY POLICY LAST UPDATED: 18 June 2020