

# Privacy Policy

**Last Updated: 23 September 2019**

This is the FintruX Pte Ltd (“FintruX”, “we”, “us” or “our”) Privacy Policy.

We are a corporation registered in the Republic of Singapore with company number 201733209Z and a registered office at 380 Jalan Besar #16-120 Singapore 209000. For the purpose of the General Data Protection Regulation (“GDPR”) and Personal Data Protection Act (“PDPA”), we are the data controller. Our data protection officer can be contacted at [hello@fintrux.com](mailto:hello@fintrux.com).

FintruX collects, uses and discloses Customer Data (as defined below) in order to provide you with a smooth, efficient and customized experience with FintruX. The collection, use and disclosure of Customer Data enables FintruX to provide services and products that are most likely to meet your needs and requirements. This Privacy Policy outlines FintruX’s policy and responsibility in relation to the collection, use and disclosure of Customer Data.

By continuing to use FintruX’s services, you signify that you have read and understood this Privacy Policy.

## SUMMARY

What information do we collect about you?

We collect information when you request for certain services on our website, mobile application or when you become a customer of FintruX, such as your contact details, financial information and banking details. We also collect device, technical information, and your preferences from your interactions with our website, mobile application and staff, and from specific requests you make. [more ...](#)

How will we use the information about you?

We use your information to fulfil our contract with you, to administer your participation on our lending program for small and medium enterprises. We also use your information to maintain our website and mobile application, and to tailor our products and services to your preferences to provide the best service possible. In addition, we use your information to market our products and services to you, and those of our partners and agents (with your consent where required by applicable law). [more ...](#)

Who do we share your information with?

We share your data with our third-party service providers to the extent necessary for them to provide their services such as identity management, know-your-customer (KYC), anti-money-laundering (AML), credit scoring, credit modelling, and payment processing. We use these third-parties’ services solely to process or store your information for the purposes described in this policy. We also share your information with government bodies as required by law. [more ...](#)

Where do we process your information?

Our servers are located in the United States and Canada. We transfer your information to the staff operating on your requests. Our staff are located in our offices around the world. [more ...](#)

How long do we keep hold of your information?

We retain your information for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of FintruX, or as required by relevant laws. However, we will endeavor to delete data within 30 days of a request for erasure. [more ...](#)

How can I exercise my rights over my information?

You may have various rights in relation to your data. [more ...](#)

Dispute Resolution

If you have any concerns or complaints, please [contact us here](#).

How will we notify you of changes?

FintruX will amend this Privacy Policy from time to time and the updated versions will be posted on FintruX's Website and date stamped so that you are aware of when the Privacy Policy was last updated. Please check back frequently to see any updates or changes to this Privacy Policy. If we make any material changes to this Privacy Policy, we will provide notice including by banner on our website. [more ...](#)

## General Customer Data privacy policy statement

### 1. The types of Customer Data we collect

The types of Customer Data that FintruX collects depends on the circumstances of collection and on the nature of the service requested or transaction undertaken.

There are two broad categories of Customer Data that FintruX collects:

- *Personal Data*. The data we collect includes but is not limited to:
  - personal information that can be used to identify an individual, such as name, gender, date of birth, passport or other personal identification numbers;
  - contact information, such as mailing address, phone number, email address;
  - payment information, such as banking information, including the name of bank, SWIFT code, name of account, account number, cryptocurrency address;
  - sign-in information, such as username, password;
  - your customer preferences, such as risk profile, terms, frequency of payments;
  - information about your interactions with our staff, such as the call details and other information relevant to assist our staff to service you;
  - information we receive from the queries you enter into our chat room, our global social media page and Website (as defined below);
  - information we receive from loan request made via our online Ecosystem;
  - information we receive from other sources e.g. our page on social media websites; and

- business information, such as the financial information of the business you own that is submitting the loan request;
- *Technical Data*. This includes device and technical information you give us when using our website or mobile application (“Website”) such as IP addresses or other unique identifiers, cookies, mobile carrier, time zone setting, operating system and platform. Information on cookies may be found in our [cookie policy](#).

For purposes of this policy statement, Customer Data means Personal Data and Technical Data.

We also use Customer Data to derive Statistical Data, such as the number of loans. This is processed and stored purely for analytical purposes, and is entirely anonymous. This information will not be stored to your customer record, and will only be aggregated for statistical analysis so that we can better understand FintruX's customer profile and improve FintruX's service offering.

#### *How we collect data from you*

FintruX collects Customer Data, either directly from you or from third parties which are located in various countries. This includes, but is not limited to, credit bureaus, our local FintruX partners in selective countries, our service providers (including, amongst others, identity agents, KYC/AML agents, credit scoring agents), or through our Website, mobile services, any posts on our FintruX-specific pages on social media websites and other channels including our local operations.

#### *Is the provision of Customer Data required?*

The collection of the following types of Customer Data is mandatory to enable FintruX to fulfil our contract with you. These types of Customer Data are marked as mandatory on our application form. If you do not provide this information, we will not be able to provide you with our services and/or products required.

- Identity details, e.g first/given name, last/family name, date of birth, social security number, passport number, the country of issue of your passport, country of residence.
- Contact details, e.g. email address, mobile phone number, home number or business number.
- Payment details, e.g. the bank name, SWIFT code, account name, account number, branch address, cryptocurrency address which will be transmitted to our payments processors.

Additional information may be mandatory if you are the guarantor to a business, e.g. the business name, GST registration number and address of the business, and business email address, phone number, and financial statements.

The collection of the following types of Customer Data is mandatory to enable FintruX to administer your account with FintruX: (i) title; (ii) last/family name; (iii) first/given name if you do not have a last/family name; (iv) date of birth; (v) email address; (vi) mobile phone number; (vii) mailing address; (viii) gender; (ix) nationality; (x) passport number; and (xi) passport expiry date.

These types of Customer Data are marked as mandatory on our sign-up form. If you do not provide this information, you will not be able to benefit from getting access to lenders or borrowers on our Ecosystem and we will not be able to provide you with our services and/or products required.

The failure to supply the following types of Customer Data will result in (i) FintruX being unable to update you on our latest products and/or launches; and/or (ii) your inability to enter or participate in contests, promotions or redemption activities organized by FintruX:

- Contact Information e.g. email address, telephone number; and
- Country of residence.

## 2. How we use your Customer Data

In accordance with our contract with you, we will use the Customer Data to:

- process and assist you with any transactions related to your participation in our Ecosystem (e.g., applying for a loan, providing a loan, fulfilling such loan and investigating potential fraudulent transactions);
- notify you about changes to our service, including alert messages via FintruX's mobile services facility;
- facilitate identity verification, KYC/AML check, credit score;
- provide services such as processing information relating to the status and performance of the loan;
- in accordance with our contract with you as a customer to FintruX, we will use the Customer Data to:
  - i. maintain your FintruX account;
  - ii. facilitate related transactions and services;
  - iii. enable you to log in using your account on our Ecosystem; and
  - iv. Send you status updates and other account related information.

As it is in our legitimate interests to be responsive to you, to provide customized services and marketing and to ensure the proper functioning of our products, services and organization, we will use your Customer Data to:

- improve the Website and to ensure content from the Website is presented in the most effective manner for you and your device;
- administer the Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
- send you surveys by email (including surveys related to our Ecosystem, if you are a customer, as detailed below). You can opt-out of receiving these surveys at any time by contacting us;
- send you service emails, such as reminders when you have not checked out your purchases on our Website. You can opt-out of receiving service emails at any time by contacting us;
- respond to your enquiries, requests or feedback;
- enforce our terms, conditions and policies;
- allow you to participate in interactive features of the Website, when you choose to do so;
- customize our products and services to you, including by responding to and catering for your customer preferences;

- personalize the content you see on our Website and Ecosystem, by enabling you to save your preferences on our system and suggesting alternatives for your next purchase;
- keep the Website and Ecosystem safe and secure;
- aggregate Customer Data into anonymized statistical data (such as number of borrowers on a particular asset class), which we will use for statistical analysis so that we can better understand FintruX's customer profile and improve FintruX's service offering;
- to customize our marketing e.g. send you targeted marketing on products and services you would like to receive, based on your responses to optional questions on our Website and your prior experience with our Ecosystem. You can object to this profiling and opt-out of receiving such targeting marketing. For more information on this right, [click here](#); and
- In relation to our participants in our Ecosystem:
  - i. market and communicate to FintruX customers information on FintruX, including those conducted by FintruX's partners (with your consent where required by applicable laws);
  - ii. contact FintruX customers regarding product and customer related surveys and market research;
  - iii. respond to email and call enquiries from FintruX customers;
  - iv. provide services to commemorate special occasions; and
  - v. send FintruX customers FintruX-related news and FintruX reminder messages and associated promotions and offers (with your consent where required by applicable laws).
- if you are an employee of an entity with a contractual relationship with us:
  - i. to contact you to perform our services, and in particular, to monitor and record calls for quality, training, legal compliance, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
  - ii. enforce our terms and conditions against your employer; and
  - iii. communicate with you about products, services, promotions, events and other news and information we think will be of interest to you.

You can object to this profiling and opt-out of receiving such targeted marketing. For more information on this right, [click here](#).

With your consent where required by applicable laws, we will use your Customer Data to:

- send you marketing and promotional materials in relation to products and services offered by FintruX, FintruX's subsidiaries and affiliated, and service partners, as well as FintruX's appointed agents including in relation to our Ecosystem; and
- register you for FintruX products and services.

You have the right to withdraw your consent at any time by contacting us at [info@fintrux.com](mailto:info@fintrux.com), by logging on to your account on Ecosystem.

### 3. Disclosure of your Customer Data

FintruX will share your Customer Data with selected third parties in the situations set out below:

- our identity, KYC/AML, credit scoring, credit modelling, payment service providers;

- our local partner operators in selected countries so that they can fulfil their contract for the funding you applied through FintruX and, where applicable, provide you with the relevant benefits of their services. Where shared with such partners, the Customer Data will be used by that partner in accordance with this privacy policy;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- analytics and search engine providers that assist us in the improvement and optimization of the Website.
- For the purposes of undertaking targeted direct marketing and other forms of marketing or advertisement, provided we have the consent of the recipient and/or have provided the opportunity to opt-out, in each case where required by applicable law. FintruX will also use and disclose your Customer Data to persons who have been validly identified as being you. FintruX will disclose your Customer Data to law enforcement agencies, public or regulatory authorities, securities commissions or other organizations for security, customs and immigration purposes, if legally required to do so, or if we have a good faith belief that such use is reasonably necessary to:
  - i. comply with legal obligation, process or request;
  - ii. enforce our terms and conditions and other agreements, including investigation of any potential violation thereof;
  - iii. detect, prevent or otherwise address security, fraud or technical issues; or
  - iv. protect the rights, property, health or safety of us, our users, a third party or the public as required or permitted by law (including exchanging Customer Data with other companies and organizations for the purposes of fraud protection and credit risk reduction).

*We will also disclose your Customer Data to third parties:*

- in the event that we sell or buy any business or assets, in which case we may disclose your data to the prospective seller or buyer of such business or assets;
- if we or substantially all of our assets are acquired by a third party, in which case Customer Data held by us about our customers will be one of the transferred assets; or
- to comply with legal obligations, processes or requests (such as disclosing Customer Data to executors in response to court orders).

In addition, FintruX may disclose Customer Data to our legal advisors for establishing, exercising or defending our legal rights, to our other professional advisors, or as otherwise authorized or required by law. FintruX also reserves the right to share Customer Data as is necessary to prevent a threat to the life, health or security of an individual or corporate entity such as FintruX. Further, FintruX will disclose Customer Data, as is necessary, to investigate suspected unlawful activities including but not limited to fraud, intellectual property infringement or privacy.

#### 4. Transfer of information overseas

The FintruX Head Office is based in Singapore. Customer Data will be transmitted to data storage facilities where FintruX keeps its central records. Customer Data will be transferred to FintruX's offices and appointed agents, including identity agents, KYC/AML agents and credit scoring agents, in Singapore and around the world in connection with FintruX's performance of the contract with you.

This means that Customer Data will be transferred to, and stored at, a destination outside of your country, Singapore and outside the European Economic Area ("EEA"), and in particular to USA/Canada where our data centers are hosted by Amazon AWS and/or Microsoft Azure.

We will transfer Customer Data to your location. The Customer Data is transferred outside the EEA on the basis that it is necessary for the performance of the contract between you and FintruX.

We will also transfer Customer Data to our local partner operators for the purposes of performing any contract between you and FintruX. You can find an updated list of our partners on Website.

The Customer Data will also be processed by staff operating outside the EEA who work for us, for our suppliers or our business partners. Such staff are engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services.

## 5. Data Subject Rights

Whether you are a resident in the EU or not, you may have certain rights in relation to the Customer Data we hold about you, which we detail below. Some of these only apply in certain circumstances as set out in more detail below. We also set out how to exercise those rights.

These rights include:

- The right of access. [More Information](#)
- The right of data portability. [More Information](#)
- The right of rectification. [More Information](#)
- The right of erasure. [More Information](#)
- The right to restrict processing. [More Information](#)
- The right to object. [More Information](#)

Please note that we will require you to provide us with proof of identity before responding to any requests to exercise your rights. We must respond to a request by you to exercise those rights without undue delay and at least within one month (although this may be extended by a further two months in certain circumstances). To exercise any of your rights, please use the following form: [Data Privacy Rights Form](#) and submit it to [info@fintrux.com](mailto:info@fintrux.com).

### *Complaints.*

In the event that you wish to make a complaint about how we process your Customer Data, please contact us and we will endeavor to deal with your request as soon as possible. This is without prejudice to your right to launch a claim with your data protection authority.

### *Access.*

You have the right to know whether we process Customer Data about you, and if we do, to access Customer Data we hold about you and certain information about how we use it and who we share it with.

If you require more than one copy of the Customer Data we hold about you, we may charge an administration fee.

We may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g. where providing the Customer Data we hold about you would reveal information about another person) or where another exemption applies.

#### *Portability.*

You have the right to receive a subset of the Customer Data we collect from you in a structured, commonly used and machine-readable format and a right to request that we transfer such Customer Data to another party.

The relevant subset of Customer Data is data that you provide us with your consent (please see here for the types of Customer Data we process on the basis of your consent: [How we use your Customer Data](#) or for the purposes of performing our contract with you (please see here for the types of Customer Data we process on the basis of our contract with you: [How we use your Customer Data](#)

If you wish for us to transfer the Customer Data to another party, please ensure you detail that party and note that we can only do so where it is technically feasible. We are not responsible for the security of the Customer Data or its processing once received by the third party. We also may not provide you with certain Customer Data if providing it would interfere with another's rights (e.g. where providing the Customer Data we hold about you would reveal information about another person).

#### *Correction.*

You have the right to correct any Customer Data held about you that is inaccurate. Please note that whilst we assess whether the Customer Data we hold about you is inaccurate or incomplete, you may exercise your right to restrict our processing of the applicable data as described below.

To exercise any of your rights, please use the following form: [Data Privacy Rights Form](#) and submit it to [info@fintrux.com](mailto:info@fintrux.com). For FintruX customers, you may correct any Customer Data by logging into your account under the section titled "Profile".

#### *Erasure.*

You may request that we erase the Customer Data we hold about you in the following circumstances:

- you believe that it is no longer necessary for us to hold the Customer Data we hold about you;
- we are processing the Customer Data we hold about you on the basis of your consent (please see here for the types of Customer Data we process on the basis of your consent: [How we use your Customer Data](#), and you wish to withdraw your consent and there is no other ground under which we can process the Customer Data;
- we are processing the Customer Data we hold about you on the basis of our legitimate interest and you object to such processing (please see here for the types of Customer Data we process on that basis: [How we use your Customer Data](#). Please provide us with detail as to your reasoning so that we can assess whether there is an overriding interest for us to retain such Customer Data;
- you no longer wish us to use the Customer Data we hold about you in order to send you promotions, special offers, marketing and lucky draws; or
- you believe the Customer Data we hold about you is being unlawfully processed by us.

Also note that you may exercise your right to restrict our processing of the Customer Data whilst we consider your request as described below.



Please provide as much detail as possible on your reasons for the request to assist us in determining whether you have a valid basis for erasure. However, we may retain the Customer Data if there are valid grounds under law for us to do so (e.g., for the defense of legal claims or bind by a legal contract that you signed) but we will let you know if that is the case. Please note that after deleting the Customer Data, we may not be able to provide the same level of servicing to you as we will not be aware of your preferences.

Where you have requested that we erase Customer Data that we have made public and there are grounds for erasure, we will use reasonable steps try to tell others that are displaying the Customer Data or providing links to the Customer Data to erase the Customer Data too.

To exercise any of your rights, please use the following form: Data Privacy Rights Form and submit it to [info@fintrux.com](mailto:info@fintrux.com). For FintruX customers, you may correct any Customer Data by logging into your account under the section titled "Profile".

#### *Restriction of Processing to Storage Only.*

You have a right to require us to stop processing the Customer Data we hold about you other than for storage purposes in certain circumstances. Please note, however, that if we stop processing the Customer Data, we may use it again if there are valid grounds under data protection law for us to do so (e.g. for the defense of legal claims or for another's protection).

You may request we stop processing and just store the Customer Data we hold about you where:

- you believe the Customer Data is not accurate, for the period it takes for us to verify whether the Customer Data is accurate;
- we wish to erase the Customer Data as the processing we are doing is unlawful but you want us to just store it instead;
- we wish to erase the Customer Data as it is no longer necessary for our purposes but you require it to be stored for the establishment, exercise or defense of legal claims; or
- you have objected to us processing Customer Data we hold about you on the basis of our legitimate interest and you wish us to stop processing the Customer Data whilst we determine whether there is an overriding interest in us retaining such Customer Data.

#### *Objection.*

At any time, you have the right to object to our processing of Customer Data about you in order to send you promotions, special offers, marketing messages, including where we build profiles for such purposes and we will stop processing the Customer Data for that purpose.

You also have the right to object to our processing of Customer Data about you and we will consider your request in other circumstances as detailed below by using the following form: Data Privacy Rights Form and submitting it to [info@fintrux.com](mailto:info@fintrux.com) referencing: Data Subject Rights.

You may object where we are processing the Customer Data we hold about you (including where the processing is profiling) on the basis of our legitimate interest and you object to such processing (please see here for the types of Customer Data we process on that basis: [How we use your Customer Data](#))

Please provide us with detail as to your reasoning so that we can assess whether there is a compelling overriding interest in us continuing to process such data or we need to process it in relation to legal claims. Also note that you may exercise your right to request that we stop processing the Customer Data whilst we make the assessment on an overriding interest by indicating this in our Data Privacy Rights form.

## 6. Retention

FintruX will retain Customer Data for as long as it is necessary to fulfil the purpose for which it was collected, the legal or business purposes of FintruX, or as required by relevant laws. We will keep your Customer Data to ensure that any contractual disputes can be addressed. This includes standing requests which contain sensitive personal data about yourself, e.g. a standing request that you wish to refinance. You can amend your standing request at any time to change your preferences in the future.

If you opt-out or withdraw your consent to marketing, we will remove you from our marketing database.

## 7. Accuracy

FintruX needs your assistance to ensure that your Customer Data is current, complete and accurate. As such, please inform FintruX of changes to your Customer Data by contacting FintruX and submitting your updated particulars to FintruX in writing (see Section 12). If you are a FintruX customer, you may update your Customer Data at any time by logging on to your account with FintruX.

FintruX will also request Customer Data updates from you from time to time. As detailed above, your information could be disclosed to the appropriate authorities as required by law. As such, it is important to ensure that the Customer Data is current, complete and accurate.

## 8. Security safeguards

FintruX takes the protection of your Customer Data seriously but, unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Customer Data, we cannot guarantee the security of your Customer Data transmitted through the Website or our Ecosystem; any transmission is at your own risk.

## 9. Links to other websites

FintruX may, from time to time, provide you with links to other websites for your convenience and information. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. You access these websites at your own risk and FintruX is not responsible for these websites. Whilst FintruX will protect your Customer Data on FintruX Website and Ecosystem, FintruX cannot control or be responsible for the policies of other sites we may link to, or the use of any Customer Data you may share

with them. Please note that the FintruX Privacy Policy does not cover these other websites, and FintruX would recommend that you are apprised of their specific policies.

#### 10. Minors

FintruX 's Website and Ecosystem are not directed at children under the age of 16 and FintruX cannot distinguish the age of persons who access and use our Website. If a minor (according to applicable laws) has provided FintruX with Customer Data without parental or guardian consent, the parent or guardian should contact FintruX (see Section 12) to remove the relevant Customer Data and unsubscribe the minor. If we become aware that Customer Data has been collected from a person under the age of 16 without parental or guardian consent, we will delete this Customer Data and, where that minor has an account, terminate the minor's account.

#### 11. Updates to the privacy policy

FintruX will amend this Privacy Policy from time to time, and the updated versions will be posted on FintruX's Website and date stamped so that you are aware of when the Privacy Policy was last updated. Please check back frequently to see any updates or changes to this Privacy Policy. If we make any material changes to this Privacy Policy, we will provide notice including by way of a banner on our website. Subject to applicable laws, the English version of this Privacy Policy will prevail over any version of this Privacy Policy in another language.

#### 12. Contact us

If you have comments, questions or complaints about or requests relating to this Privacy Policy statement, please contact FintruX in writing at the address below referencing 'Privacy Policy':

FintruX Pte Ltd

380 Jalan Besar #16-01 Singapore 209000

Or email [support@fintrux.com](mailto:support@fintrux.com) referencing: Privacy Policy.