

Alldebit Pte. Ltd.

Policy Alldebit Pte Ltd  
PDPA Privacy Policy

Last updated on Oct 2023

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**allddebit**

Alldebit Pte Ltd is strongly committed to protecting individual party's (party) privacy and complying with Personal Data Protection Act (PDPA). Personal data collected is effectively safeguarded according to the data protection standards adopted worldwide.

### **Our Commitment**

- Personal data will not be shared, rented or sold to any third party
- We use state-of-the-art security measures to protect personal data from unauthorized users
- We give parties the possibility to control the information that parties share with us (opt-out)

Alldebit Pte Ltd is committed to processing data in accordance with its responsibilities under the PDPA.

- a. data is processed lawfully, fairly and in a transparent manner in relation to individuals;*
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;*
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*
- d. accurate and, where necessary, kept up to date; every reasonable step taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;*
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by PDPA in order to safeguard the rights and freedoms of individuals; and*
- f. 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."*

## **1. Overall terms**

**1.1** This Privacy Notice ("Notice") serves to illustrate how Alldebit Pte Ltd and its respective subsidiaries and jointly controlled entities (collectively "Alldebit", "the Company", or "we"), will use and protect your Personal Data in compliance with the Personal Data Protection Act 2012 (PDPA). We value your privacy, and as such, are committed to managing your Personal Data entrusted to us with the attention it deserves. This notice applies to the Personal Data collected in the Company's website at [www.alldebit.com](http://www.alldebit.com), the Company's social media and customer communication channels, the Company's mobile application, and any services accessed by you through our website, mobile application, social media or customer communication channels.

**1.2** This Notice is a document to help you understand how we manage the Personal Data we collect from our customers, as well as why we collect them, how we use them and under what circumstances we will disclose them. Please note that this Notice will be supplementary in addition to any other consent you may have given to us in connection to your Personal Data.

**1.3** Please be sure to check for any updates to this Notice, which will be made from time to time. We are a company that strives to ensure our information and practices are up-to-date and consistent across the board, and as such, will revise this Notice as new developments and changes in legal and regulatory requirements arise. By interacting with us, you are agreeing to be bound by our Notice. Any updates will be available on our website, [www.alldebit.com](http://www.alldebit.com).

**1.4** Should you wish to find out more about how we manage your Personal Data, please contact us through e-mail at [hello@alldebit.com](mailto:hello@alldebit.com) (with "Personal Data Protection" as the subject).

**1.5** In order to better serve your needs, our Data Protection Officer may reach out to you for further information or clarification, if deemed necessary.

## **2. Personal Data**

**2.1** In this Notice, "Personal Data" means any data which the Company has, or may have access to, upon which can be used to identify a person, whether or not the relevant data is correct.

**2.2** Some examples of these Personal Data are the following, some of which you might have provided to us during our interaction:

**2.2.1** Personal identification information including but not limited to your name, official identification (such as passport, national identification number, photocopies of your identification documents, driver's license, work permits and residency cards), photo, nationality, gender, date of birth, telephone number(s), postal address, e-mail address;

**2.2.2** Bank transaction information such as your bank account details, the merchant or ATM's location and additional details about them; date, time and transaction amount, payment instrument, details of foreign currency exchange, details of cross-border transactions and detailed information of any electronic money exchange between the sender and the receiver such as name, date, time, location, IP address and information about the device used to process the transaction;

**2.2.3** Information that can enhance your overall user experience and enhance fraud management of the product, including your device's operating system and platform, browser type and version, plug-ins, device type, unique device identifier, GPS data, location data, web or mobile analytics such as clickstream and page interaction data;

## **3. Collecting Personal Data**

**3.1** In order to process, administer and / or manage your relationship and / or account with us, it may be necessary for us to collect, use, disclose and / or process your Personal Data or other personal information. These may include those listed in our products or services application form(s), which may have been submitted via e-mail, website, mobile application or any other method.

#### **4. Purpose for the Collection, Use and Disclosure of Your Personal Data**

**4.1** We collect, use, disclose and / or process your Personal Data for the following purposes ("Purposes"):

**4.1.1** Processing your application, including but not limited to verifying your identity and evaluating your financial and legal track record, for our goods or services;

**4.1.2** Administering and / or managing your relationship or account with us;

**4.1.3** Processing and / or dealing with any of your request and any necessary investigations relating to your request;

**4.1.4** Carrying out due diligence or other screening activities in accordance with legal or regulatory obligations or risk management procedures that may be required by law or by us;

**4.1.5** Carrying out your instructions or responding to any of your enquiries;

**4.1.6** Requesting feedback or participation in surveys, as well as conducting market research and/or analysis for statistical, profiling or other purposes for us to improve and design our products, understand customer preferences and market trends, and to review, develop and improve the quality of our products and services;

**4.1.7** Providing media announcements and responses;

**4.1.8** Dealing with any matters relating to the services and / or products which you are applying for or have already applied for, including mailing to you correspondences, statements, invoices, reports or notices, processes which involve disclosing certain Personal Data about you in order to carry out the aforementioned delivery, as well as disclosing certain Personal Data on the cover of envelopes / mail packages);

**4.1.9** Investigating fraud, misconduct, unlawful action or omission, and any suspicion of the aforementioned; and/or

**4.1.10** Complying with applicable law in administering and managing your relationship with us;

**4.1.11** Any other purposes related to any of the above.

**4.2** We may also use and process your Personal Data for other marketing and promotional related purposes such as ("Additional Purposes") via post, email, telephone call, SMS, mobile app notification, website, and/or online messaging service:

**4.2.1** Providing marketing services, products and benefits to you, including promotions, loyalty and reward programmes;

**4.2.2** Sending you details of products, services, special offers and rewards, either to our users generally, or which we have identified as may be of interest to you;

**4.2.3** Notifying you on events or activities organized by Alldebit, its partners, sponsors or advertisers, and processing the registration for such events or activities; and/or

**4.2.4** Matching Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by Alldebit or other third parties.

## **5. Withdrawal of Consent**

**5.1** You may communicate your objection to our use and/or disclosure of your Personal Information for any of the Purposes or Additional Purposes as stated in this Notice at any time by contacting our Data Protection Officer using the contact details stated in the below.

**5.2** However, please take note that depending on the nature and specifics of your objection, we may not be able to continue to provide our products or services to you or perform on any contract we have with you.

## **6. Disclosure of Personal Data**

**6.1** We will take reasonable steps to protect your Personal Data against unauthorised disclosure. To the extent permitted by law, we may transfer or disclose your Personal Data for the Purposes and Additional Purposes stated in this Notice, to the following entities or parties, whether they are located overseas or in Singapore:

**6.2** Alldebit's related companies;

**6.3** Counterparties and their respective financial institutions in relation to payments and other transactions;

**6.4** Issuer of the stored value facility;

**6.5** Agents, contractors or third party service providers who provide operational services to Alldebit, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, customer support investigation services or other services to Alldebit;

**6.6** Vendors or other third party service providers, including but not limited to advertisers and event management companies, in connection with promotions and services offered by Alldebit;

**6.7** Professional advisors and external auditors, including legal advisors, financial advisors and

consultants;

**6.8** Co-branded and other business partners; and/or

**6.9** Any other party to whom you authorise us to disclose your Personal Data to.

## **7. Accessing Your Personal Data and Correction Requests**

**7.1** Should you wish to access a copy of or request for correction of your Personal Data held by us, you can submit your request to our Data Protection Officer by contacting us via:

### **Email**

hello@aldebit.com

### **Mail**

Data Protection Officer  
Aldebit Pte Ltd  
114 Lavender Street #02-63  
CT HUB 2  
Singapore 338729

Please note that we may need to ask for your identification number and other necessary details during the process to verify your identity. We reserve the right to refuse your requests to access and/or correct your Personal Data for reasons permitted by law.

**7.2** We reserve the right to charge a reasonable fee for processing your request to access or retrieve your Personal Data.

## **8. Acknowledgement and Consent**

**8.1** By providing your personal information to us, or using our website, or signing up for or accessing products or services we offer during any of our interactions, either directly with us or through our agents and / or partners, you are consenting to the following:

**8.1.1** The Company may collect, use, disclose and / or process your Personal Data for the Purposes and Additional Purposes as described above;

**8.1.2** The Company may collect Personal Data about you from sources other than yourself and use, disclose and / or process the same for one or more of the Purposes and Additional Purposes as described above; and

**8.1.3** The Company may disclose your Personal Data to our third party service providers or agents (including its lawyers / law firms) for the Purposes and Additional Purposes as described above.

## **9. Telephone Calls, E-mails and Text-Based Enquiries**

**9.1** To continuously improve our service, all communications between you and the Company, whether made via telephone calls, e-mails and / or text-based modality may be recorded and monitored.

## **10. Research**

**10.1** For research or statistical purposes, we may use or disclose to others anonymised or aggregated data.

## **11. Use of Cookies**

**11.1** The Company, and third parties with whom we partner, may use cookies, tags, scripts, web objects, advertising identifiers (such as mobile device identifiers including but not limited to Apple's IDFA or Google's Advertising ID) and similar technology ("Cookies") during your use of our website, mobile application, social media channels, and customer contact channels. Cookies may contain unique identifies and are stored or used in, including but not limited to, your computer or mobile device, emails we send to you, and our web pages. By using our website and / or mobile application, you consent to us on the usage of Cookies.

**11.2** Cookies may transmit information about you and your use of our service, including but not limited to:

**11.2.1** IP Address;

**11.2.2** Browser / Device type;

**11.2.3** Website or mobile application visited before you came to our website or mobile application

**11.2.4** What page user viewed on our website or mobile application

**11.2.5** Time spent on our website or mobile application

**11.3** Cookies may be stored persistently or stored only during an individual user session.

**11.4** Cookies enable the Company to provide and develop a more personalized browsing and usage experience on our website and mobile application, and improve the experience of displaying targeted advertising to you.

**11.5** The Company may allow third parties to use Cookies on our website and mobile application to collect the same type of information. Third parties may be able to associate the information they collect with other additional information they collected about you from other sources. We do not necessarily have access to or control over the Cookies they use.

**11.6** The Company may share non-personally identifiable information about you with third parties, such as advertising identifier, location data, or encrypted account identifier to improve the experience of displaying targeted advertising on platforms including but not limited to search engine and social media channels.

**11.7** You may deactivate cookies by adjusting your internet browser settings to disable, block or deactivate cookies, by deleting your browsing history and clearing the cache from your

internet browser if you do not wish your Cookies to be collected. You may also be able to limit our sharing of some of this information through your mobile device settings.

**Approved by**

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Name and Title