

Last updated: 24 January 2022

This Privacy Policy applies to all the services provided by Pocket Trader (Malaysia) Limited (“Pocket Trader”, “we” or “us”) and explains how we collect and use your Personal Information (as defined below) when you use the Pocket Trader website (“Website”) and/or the Pocket Trader software application (“Software Application”) (together, the “Platform”).

This policy informs you about what type of information we collect, and explains how and why we collect, use and disclose the information that you share with us through the Platform or when you otherwise interact with us. The provision of your Personal Information is necessary for us to provide our services to you through our Platform, as explained in this Privacy Policy. If you do not wish to provide your Personal Information to us, we may be unable to open or maintain an account for you.

By checking the consent box when you sign up, and by visiting or using our Platform, you consent to the processing of your Personal Information in accordance with this Privacy Policy. Should you wish to withdraw your consent and cease to use our services as a result, please notify us in accordance with the “Contacting us” section below.

## **1. WHICH INFORMATION IS COLLECTED AND HOW WE COLLECT YOUR PERSONAL INFORMATION**

**Information that you provide when you complete an application for a live or demo account, when you use our Platform or when you communicate with us via email or any other electronic methods of communication:**

We collect information that you provide when you complete an application for a live or demo account, when you use our Platform or when you communicate with us via email or any other electronic methods of communication. This may include the following information:

**Personal Information.** Personal Information refers to any data relating directly or indirectly to you and from which you are or can be identified. When you complete an application to register for an account, update your information or edit your profile, we collect and store your Personal Information which may include but may not be limited to the following:

For demo and/or live account openings:

- a. full name, including any aliases used
- b. email address, username and profile picture and biography

For live account opening only:

- a. unique identification number such as passport number or reference number of any other official identification documents bearing your photograph
- b. existing residential address and mailing address
- c. contact telephone number(s) (home, office or mobile)
- d. date of birth
- e. nationality
- f. occupation type, name of employer or nature of self-employment/nature of business
- g. source of wealth (i.e if the income does not match with the occupation), such as payslips or bank statements
- h. any additional information (e.g. volume of assets, trading experience)

Content, communications and other information. We also collect the content, communications and other information that you provide when you use our Platform. This includes accounts details, transaction history, ideas, portfolio, positions, trade details, trade analysis, pending orders, journal information, cashflows, chat communications, broadcast and discussion channels content, likes and comments you've posted.

Password Hash. We collect and store information about your Pocket Trader password (your password hash); that hash is sent to Pocket Trader's servers.

Files and Data. We collect and store files and information that you transmit to other parties using the Platform or that you elect to store on the Platform.

Do Not Track. Pocket Trader does not collect personally identifiable information from you to track you across third party websites. As a result, Pocket Trader does not specifically respond to web browser Do Not Track signals.

**Information collected automatically:**

Usage Information. When you use the Platform, we automatically collect and store information about your browsing habits and your use of the service, including:

- Your computer's or device's IP address and location data
- The buttons and controls you clicked on (if any) within the Platform
- How long you used the Platform and which parts and features you used
- Session times and lengths
- Your preferences and settings (time zone, language, privacy preferences, application preferences, etc.)
- The other registered users you interact with

## **2. HOW WE USE YOUR INFORMATION**

We collect and use your Personal Information for the purposes identified below:

- Create, maintain and manage your account
- Provide you with our services through the Platform
- Communicate with you about your account or use of the services through the Platform
- Address, investigate, resolve and communicate with you about your general queries and complaints and maintain records of details of such queries and complaints, responses and actions taken
- Improve the services and our Platform
- Tailor services to specific region
- Verify the identity of new, existing and potential users, conduct customer due diligence and conduct regular checks on the names of new, existing and potential users
- Comply with legal requirements in relation to anti-money laundering, counter financing of terrorism and proceeds of unlawful activities
- Submit suspicious transactions reports and inform the relevant supervisory authorities
- Diagnose and fix problems with the services
- Pursue or enforce our legal rights related to our business, services, Platform and defend against claims made against us

In the event we intend to further process your information for a purpose other than for which it was collected, we will provide you with information on that

other purpose and obtain your consent before processing your Personal Information.

### **3. HOW WE SHARE YOUR INFORMATION**

#### **Third-party service providers**

Pocket Trader works in collaboration with third-party service providers in order to develop the products and provide the services through the Platform. As such we may share and process your Personal Information with third-party service providers where necessary to provide the services to you and which may be based in various locations including outside of Malaysia. These locations may have different laws and data protection compliance requirements to those that apply in Malaysia.

#### **Sharing for legal purposes**

We may disclose any information, including your Personal Information and any other information or data collected, stored or processed on our servers, if required to do so by law or in the good-faith belief that such action is necessary to (i) comply with any law, regulation, legal process or lawful governmental requests, (ii) protect the rights or property of Pocket Trader or our customers, including the enforcement of our agreements or policies governing your use of the service, and (iii) act on a good faith belief that such access or disclosure is necessary to protect the personal safety of Pocket Trader employees, customers, or the public.

#### **Change of ownership or restructuring**

In the event of a proposed or actual business transaction, corporate restructuring, sale or merger of Pocket Trader, or involving some or all of our business, assets or equity, we may disclose and/or transfer information that we have collected to those involved in assessing, planning and completing the sale

(including the potential counterparties and their employees, agents and representatives).

### **What we do not share**

- We do not share with anyone or publish your Pocket Trader password (also referred to as “passphrase”) or password hash.
- We do not share session cookies, login and reset-password links and site invitation codes and history.

We also do not sell or provide Personal Information about our users to any third party for marketing purposes.

## **4. LINKS TO OTHER WEBSITES**

Our Platform may contain links to other websites. Our Privacy Policy applies only to our Platform. If you choose to share any information with a third party, such as Facebook, LinkedIn, Google or Twitter, the collection and sharing of the information that the third party receives will be governed by that third party’s privacy policy. We are not responsible or liable for the privacy practices of any third-party website that is linked to our Platform.

## **5. HOW YOU CAN MANAGE YOUR INFORMATION**

### **Your right to access your Personal Information**

You have a right to access your Personal Information. You can always access it by visiting your profile or, upon request, you may obtain a copy of your Personal Information.

## **Your right to rectification**

You may correct any inaccurate, misleading or not up-to-date Personal Information or complete any incomplete Personal Information.

## **Your right to erasure**

Unless we have an overriding legitimate ground for continued processing, you have the right to request the deletion of your Personal Information, under certain conditions.

## **Your right to restrict processing**

You have the right to request that we restrict the processing of your Personal Information, under certain conditions.

## **Your right to object to processing**

You have the right to object to the processing of your Personal Information, under certain conditions.

## **Your right to data portability**

You have the right to request that we transfer the Personal Information that we have collected to another organization, or directly to you, under certain conditions.

If you are based in the EU, you have a number of additional legal rights in relation to the Personal Information that we hold about you pursuant to the Regulation (EU) 2016/679 (General Data Protection Regulation).

If you would like to exercise any of these rights, please notify us in accordance with the “Contacting us” section below. We will ensure to comply with your requests free of charge, as soon as practicable and consistently with applicable law. However, in the event your requests are manifestly unfounded or excessive, we may charge an administrative fee or refuse to meet your request.

Please note that, in order to protect your Personal Information, we may need to verify your identity before fulfilling your request.

## **6. COMPLAINTS**

If you have any complaints in relation to the processing of your Personal Information, you may contact us by email at [FEEDBACK@POCKET-TRADER.COM](mailto:FEEDBACK@POCKET-TRADER.COM).

If you are in the European Union, you also have the right to raise your issues or lodge a complaint with the relevant data privacy authority in your jurisdiction.

## **7. COOKIES**

When you use our Platform, we may collect information from you automatically through cookies or other similar technologies. Cookies are small text files that are stored on users’ computer hard drive or device when they visit a website.

There are a number of different types of cookies. Our Platform uses functionality cookies in order to improve your experience on our Platform (including to keep you signed in, understand how you use our Platform and remembering your previously selected preferences), cookies to provide us with general analytics and gather demographic information in a non-identifiable form, and security cookies in order to keep your account and data secure.



Our Platform also uses third-party cookies such as Google Analytics, a service which transmits website traffic data to Google servers. Google Analytics does not identify individual users or associate your IP address with any other data held by Google. We use reports provided by Google Analytics to help us understand website traffic and webpage usage.

By using the Platform, you consent to Google processing your data in the manner described in Google's privacy policy. You can opt out of Google Analytics if you disable or refuse the cookie, disable JavaScript, or use the opt-out service provided by Google-external site.

You can disable and/or delete cookies on your device by indicating this in the preferences or options menu in your browser. However, doing so may limit your ability to use our Platform.

## **8. CHILDREN**

Our Platform is not targeted for use by individuals under the age of 18.

## **9. HOW WE STORE YOUR INFORMATION AND INTERNATIONAL TRANSFERS**

Because of the global nature of the services provided through the Platform, international data sharing is essential to the provision of the services. We will transfer Personal Information to related entities, providers and agents or store data in data centers and servers around the world, which may be located in countries where data protection standards may differ from those in the country where you reside. Some countries are classed by the European Commission's adequacy decisions as offering adequate levels of protection for information transfers, but other countries may not offer the same level of protection. In certain circumstances, courts, law enforcement agencies, regulatory agencies

or security authorities in third countries may be entitled to access your Personal Information.

We will take reasonable steps and security measures to protect your Personal Information from unauthorized or unlawful processing and against accidental loss, destruction or damage, including applying generally accepted industry standards, encryption, access controls and security breach protocols.

By using the Platform and by providing information relating to you, you understand and agree that we may transfer your Personal Information globally. Any such use or transfer of your Personal Information will be carried out in compliance with applicable laws and without undermining your statutory rights.

## **10. RETENTION OF YOUR PERSONAL INFORMATION**

We will retain your Personal Information and all communications between you and us for the period necessary to carry out the purposes set out in this Privacy Policy, to comply with applicable legal and regulatory obligations and recordkeeping requirements, or to address any complaints. When your Personal Information is no longer required, it will be securely destroyed.

## **11. SECURITY**

Pocket Trader takes administrative and technical measures to protect your Personal Information from unauthorized or accidental access, processing, erasure, loss or use.

We ensure that only the personal, related entities, providers and agents that are strictly necessary to the provision of the services have access to your Personal Information. All recipients are subject to strict confidentiality obligations.

We require that you use a password to use our services and as set out in our Terms of Service, your password and account can only be used by you personally. Password protection helps protect the information we collect from misuse, unauthorized access, disclosure, alteration and destruction.

We use data security technology, firewalls and data encryption. The service is currently hosted on Amazon's AWS. All data is transferred with industry standard TLS during transmission.

While we do use care to protect your information, no data transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure. As a result, we cannot guarantee absolute security. If you have any reason to believe that the security of your account has been compromised, please notify us in accordance with the "Contacting us" section below.

## **12. CHANGES TO THIS PRIVACY POLICY**

We regularly review and update this Privacy Policy to ensure it remains in line with our information practices and applicable regulations and will place any updates on the Platform. Those changes will go into effect on the "Last updated" date shown at the top of the updated Privacy Policy, and any information being held will be governed by the most recent policy. Your continued use of the Platform after the last updated date will be considered as acceptance of the revised Privacy Policy.

## **13. CONTACTING US**

If you have any questions about this privacy policy or any information we have collected about you, please contact us by email at [FEEDBACK@POCKET-TRADER.COM](mailto:FEEDBACK@POCKET-TRADER.COM), or by postal mail at:

Pocket Trader (Malaysia) Limited

Attn: Compliance Officer

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