

Privacy Policy

A. Policy Statement

Smart Engine Pte. Ltd and our affiliates respect customer privacy and are committed to protecting it. The purpose of Smart Engine Privacy Policy is to explain Smart Engine's privacy policy and practices and how customer personal data ("Personal Information") is collected, used, disclosed and maintained by us. We will be the data controller of such Personal Information and will process your Personal Information in accordance with our Privacy Policy.

The use and/or purchase of any of our services is subject to the applicable terms, the use of our website is subject to our website terms of use and this Privacy Policy is incorporated into and forms part of those terms.

B. Personal Information Smart Engine Pte. Ltd Collects

We collect Personal Information about our customers from the following two main channels:

1. *Website, Account and General Communications*

In order to provide materials and services to you, when you visit our website, request materials from us, register for events, or contract with us, we will collect data from you. We will receive your information in these circumstances, as examples:

- Visiting and using our website
- Account Application Forms and other documents and data submitted by customers, such as customer name, residential address, date of birth, employment information, investment experience, annual income, and estimated net worth
- Customer Transactions with Smart Engine Pte. Ltd. such as ordering our products/services, account deposits and withdrawals that require customers to provide bank account information
- Communications with Smart Engine including with customer service representatives and our LiveChat function.

We refer collectively to these interactions as "Website Services". We explain below how we collect and use your information collected through the Website Services.

2. *Platform*

If you request access to our FX trading platform and payment portal (the "Platform"), we will also collect information about your use of the Platform. The information collected through the Platform will include usage, performance, analytic and metadata and some of this may include your Personal Information. This does not include the Smart Engine demo trading account (which falls within the scope of our Website Services).

Smart Engine does not collect more Personal Information than is required to open and operate customers' accounts, and to comply with regulatory compliance and other legal obligations.

Website, Account and General Communications

What We Collect

We (or third-parties acting on our behalf) may collect your information, including your Personal Information, when providing the Website Services including:

- Name
- Email
- Address
- Phone Number
- Country of Residence
- Date of Birth/Age
- IP address.

Platform

What We Collect

We (or third-parties acting on our behalf) may collect your information, including your Personal Information, when providing access to the Platform including:

- Name
- Email
- Address
- Phone Number
- Country of Residence
- Date of Birth/Age
- Tax Identification Number
- Income
- Income Source

C. How Smart Engine Uses Personal Information

We may hold and retain information about you for various purposes based on different reasons.

1. Website, Account and General Communications

Some of the information we collect from you we need to enable us to deliver the Website Services to you in accordance with our terms, sometimes we are required by law and regulations to collect and process this information about you. At other times, we consider it is in our legitimate business interests to collect and process this information, taking into consideration your privacy rights. We may use your information to:

- Fulfill your orders or respond to requests you make in connection with providing the services under our terms with you

To provide you with a response pursuant to your request and your agreement with the applicable terms, we will collect and use Personal Information including your name and email address.

- Provide our Website Services to you, including access to a demo account or support through our LiveChat function.

In order to perform the Website Services under the contract between you and Smart Engine, we have to collect certain Information from you such as your name and contact details. Without this information, we may not be able to deliver the services which you request from us.

- Improve and develop the Website Services

We look for ways to innovate and advance our Website Services. We will use Information about how you use the Website Services, including how you interact with various aspects of the Website Services, the duration for which you use the Website Services and content that is of interest to you, in order to do this. It is in our legitimate business interests to use Personal Information in this way to develop improved Website Services.

- Send administrative information, changes to contract terms or policies

Where we make updates to terms and policies we are required under certain laws and under our contract with you, to notify you of these changes. Other administrative communications, may be necessary in order for us to perform our obligations under the contract with you, or may be sent out in line with our legitimate business interests.

- Send marketing communications like product announcements, educational materials or upcoming online or offline events, where you have not objected to receiving these or with your consent where required. This may also include inviting you to participate in various promotional activities and consumer research surveys.

It is in our legitimate business interests to generate growth for our own business to ensure we continue to generate development for our company and drive sales of our products and services. We will carry out marketing campaigns and research surveys in accordance with other applicable laws.

We use your information in our legitimate business to understand how you interact with our Website Services and to deliver relevant content to you online.

- Diagnose and fix technical issues and monitor the security of our environments

We need to understand how our Website Services are performing in order to prevent and address any issues that may present themselves with regard to technical and security operations. We may process your Personal Information for this purpose in our legitimate business interests to protect the integrity of the Website Services

- To comply with any applicable law, regulation, legal process, or governmental request.

- For any other purpose disclosed to you in connection with our Website Services from time to time

If we intend to process your Personal Information for a purpose other than that set out above, we will provide you with information prior to such processing.

it is also in our legitimate business interests to process your Personal Information to protect our rights or property, or the security or integrity of our Website Services.

Third-Party Content. The Website Services may offer access to third party services. These services may collect and use your information. This Privacy Policy does not extend to third-party apps or add-ons (which may also collect your Information) even if packaged by Smart Engine or offered through the Website Services.

2. Platform

We collect Personal Information including payment details, as set out above, in order to provide access to the Platform under the contract between Smart Engine and you. We are also required to keep these payment details to comply with our own legal obligations.

We also collect and process usage data when you use our Platform (e.g. IP address, session duration, activities undertaken on the Platform and other use data) ("Usage Data") in order to provide, maintain, and improve our Platform.

In addition, we collect and process data about our Platform, features or users in order to improve the Platform ("**Analytics Data**"). Analytics Data may include information about the devices operating the Platform (e.g. browser type/version, OS type/version, device type/version), or such other similar information about user configuration or operation of service features or functionality.

Whilst both Usage Data and Analytics Data may not contain information that we can use to identify you in the "real world" (such as a name or address), we collect this data and store it against a uniquely assigned ID.

We may use automated decision making to analyze the transactions you conduct using the Platform and create a profile of your usage. We may use algorithms to perform this analysis. This assists the monitoring of transactions for fraudulent activity as well as review general performance of our clients. If this raises concerns about fraudulent activity, we may take steps to close the client account and liaise with authorities as is necessary.

How we use this Platform data

Usage Data. Specifically, Smart Engine may use Usage Data to:

- Positively identify and determine eligibility of customers opening accounts
- Evaluate whether currency trading is suitable for each customer
- Complete bank deposits and withdrawals
- Effect, administer or enforce transactions requested or authorized by the customer and
- Maintain or service the customer's account with Smart Engine.

Our lawful basis for using Usage Data is in order to take steps to enter into a contract with you or as is necessary for the performance of a contract already in place between us.

Analytics Data. Smart Engine uses Analytics Data to help us better understand how our Platform is being used, make improvements, and develop new features, products and services. We may use this data to:

- Better understand how our users configure and use our Platform
- Determine which configurations or practices optimize performance (e.g. best practices)
- Perform data analysis and audits
- Identify, understand and anticipate performance issues and the environmental factors that affect them
- Other such business purposes relating to the operation, improvement, or development of our Platform.

The use of this Analytics Data, for the purposes described in the above, is carried out pursuant to our legitimate business interests, to develop, expand and improve our Platform offering.

We are sure to balance our legitimate business interests with your privacy rights and we take steps in how we process and use Usage Data and Analytics Data to protect these.

Personal Information collected online may be combined with other information customers provide to Smart Engine in hard copy or through the Smart Engine help desk.

E. How we secure your Personal Information

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website Services and Platform, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our Website Services and Platform; any transmission is at your own risk. Once we have

received your information, we will use strict procedures and security features to try to prevent unauthorized access.

G. How long we retain your Personal Information for

We retain Personal Information (a) in relation to the Platform, for as long as you have an account with us in order to meet our contractual obligations to you and for five years after that to identify any issues and resolve any legal proceedings, (b) in relation to Website Services, for 12 months unless such data is likely to relate to a contract you may/have entered into in the future, and subject to any subject access requests you may make and (c) in relation to any data provided with consent for research purposes, until such time when the data are no longer needed for the purpose for which they were first collected.

We may also retain aggregate information beyond this time for research purposes and to help us develop and improve our services. You cannot be identified from aggregate information retained or used for these purposes.

H. Your Data Subject Rights

Any concerns a customer may have regarding Smart Engine's Privacy Policy or specific complaints about how customer Personal Information has been collected, used or disclosed should be forwarded in writing to Smart Engine's Privacy Officer. Smart Engine will thoroughly investigate the complaint and will take whatever actions are warranted and notify the customer once this has been done.

You have the right under certain circumstances:

- to receive information about the processing of Personal Information concerning you. You are entitled to access your Personal Information
- to request the rectification or erasure of your Personal Information held by us
- to object to the further processing of your Personal Information, including the right to object to marketing
- to request that your provided Personal Information be moved to a third party.

Depending on the context of your request, such as erasure, we may not be able to provide you with access to some or all of the Website Services and/or Platform, since we process your information in order to provide you with such access.

Your right to withdraw consent:

Where the processing of your Personal Information by us is based on consent, you have the right to withdraw that consent at any time by contacting us as per [section L](#) below.

How to exercise your rights

You can also exercise the rights listed above at any time by contacting us at privacy@Smart Engine.com

If your request or concern is not satisfactorily resolved by us, you may approach your local data protection authority (to your habitual residence, v ur place of work, or where the alleged infringement took place).