

## **Applicable If you live in**

**EEA** or a country other than US, Canada, Japan, Singapore or Hong Kong

## **eGlobal Privacy Policy**

This policy explains what you can expect from us and what we need from you in relation to your personal data. Please read this carefully as this policy is legally binding when you use our Platform.

For the purpose of the relevant data protection regulations, eGlobal are the “data controller” of your information. We are located on the 6B, San Chong Industrial Building, 11 Ka Hing Road, Kwai Chung, N.T. Hong Kong. Our registration number with the 2813028. If you have any questions about how we protect or use your data, please email us at [legal@eGlobal.me](mailto:legal@eGlobal.me)

### **1. How do we protect your personal information**

1.1 We are serious about guarding the security of your personal information and use a secure server to store your personal information. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using Transport Layer Security technology.

1.2 As you will know, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data during transmission, and 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 unauthorised access.

1.3 We restrict access of your personal information to those employees of eGlobal who have a business reason for knowing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic and procedural safeguards that comply with the relevant laws and regulations to protect your personal information from unauthorised access.

### **2. Information we may collect from you**

We may collect and use the following data about you:

#### **2.1 Information you give us.**

(a) You may give us information about you when you sign up to use our service, e.g. when you provide us with your personal details, such as your name, mobile number and email address. This also includes information you provide through your continued use of our Platform, participate in discussion boards or other social media functions on our Website, Platform or Mobile App, enter a competition, promotion or survey, and when you report a problem with our Platform. The information you give us may include your name, address, e-mail address and mobile number.

(b) In providing the personal data of any individual (other than yourself) to us during your use of our Platform, you promise that you have obtained consent from such individual to disclose

his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data, for the purposes set out in this Privacy Policy.

2.2 Information we collect about you. With regard to your use of our Platform services we may automatically collect the following information:

(a) details of the transactions you carry out when using our Platform services, including geographic location from which the transaction originates;

(b) technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;

(c) information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our Customer Support number.

2.3 Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other Platform services we provide. We are also working closely with third parties and may receive information about you from them.

For example:

the banks you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;

business partners may provide us with your name and address, as well as financial information, such as card payment information;

advertising networks, analytics providers and search information providers may provide us with pseudonymised information about you, such as confirming how you found our website;

credit reference agencies do not provide us with any personal information about yourself, but may be used to corroborate the information you have provided to us.

2.4 Information from social media networks. If you log in to our Platform services using your social media account (for example, Facebook or Google) we will receive relevant information that is necessary to enable our Services and authenticate you. The social media network will provide us with access to certain information that you have provided to them, including your name, profile image and e-mail address. We use such information, together with any other information you directly provide to us when registering or using our Platform, to create your account and to communicate with you about the information, products and services that you request from us. You may also be able to specifically request that we have access to the contacts in your social media account so that you can send a referral link to your family and friends. We will use, disclose and store all of this information in accordance with this privacy policy.

### **3. Cookies**

3.1 Our Platform services use cookies to distinguish you from other users. This helps us to provide you with a good experience and also allows us to improve our Platform Services. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

### **4. Uses made of the information**

We use your information in the following ways:

- (a) to carry out our obligations relating to your contract with us and to provide you with the information, products and services;
- (b) to comply with any applicable legal and/or regulatory requirements;
- (c) to notify you about changes to our Platform Services;
- (d) as part of our efforts to keep our Platform Services safe and secure;
- (e) to administer our Platform Services and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- (f) to improve our Platform services and to ensure that they are presented in the most effective manner;
- (g) to measure or understand the effectiveness of advertising we serve and to deliver relevant advertising to you;
- (h) to allow you to participate in interactive features of our Platform services, when you choose to do so;
- (i) to provide you with information about other goods and services we offer;
- (j) to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you; or
- (k) to combine information we receive from other sources with the information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

### **5. Disclosure of your information**

5.1 We may share your information with selected third parties including:

- (a) affiliates, business partners, suppliers and sub-contractors for the performance and execution of any contract we enter into with them or you;
- (b) advertisers and advertising networks solely to select and serve relevant adverts to you and others; and
- (c) analytics and search engine providers that assist us in the improvement and optimisation of our site; and

5.2 We may disclose your personal information to third parties:

- (a) in the event that we buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- (b) to assist us in conducting or co-operating in investigations of fraud or other illegal activity;
- (c) to prevent and detect fraud or crime;
- (d) in response to a subpoena, warrant, court order, or as otherwise required by law;
- (e) to recover debt or in relation to your insolvency; and
- (f) to develop customer relationships, services and systems.

5.3 We do not have a published list of all of the third parties with whom we share your data with, as this would be heavily dependant on your specific use of our Platform. However, if you would like further information about who we have shared your data with, or to be provided with a list specific to You, you can request this by writing to [legal@eGlobal.me](mailto:legal@eGlobal.me)

## **6. Where we store your personal data**

6.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your payment order, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

## **7. Sharing your data outside of the EEA**

7.1 In order to provide our Platform services to you, it is sometimes necessary for us to transfer your data to the third parties outlined in section 5.1 that are based outside of the European Economic Area. In these cases, we ensure that both ourselves and our partners take adequate and appropriate technical, physical and organisational security measures to protect your data. We also ensure we have appropriate contractual protections in place with these third parties.

## **8. Profiling and Automated Decision Making**

8.1 We may use some instances of your data in order to customise our Platform services and the information we provide to you, and to address your needs - such as your country of address. For example, if you frequently send funds from one particular currency to another, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all reasonable necessary measures to ensure that your privacy and security are protected - and we only use pseudonymised data where ever possible. This activity has no legal effect on you.

8.2 We may use Automated Decision Making (ADM) to improve your experience, or to help fight financial crime. So that we can provide you with a fast and efficient service, we may use ADM to verify your identity documents, or to confirm the accuracy of the information you have provided to us. None of our ADM processes have a legal effect on you.

## **9. Data Retention**

9.1 As a regulated financial institution, eGlobal is required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary.

9.2 We will always delete data that is no longer required by a relevant law or jurisdiction in which we operate.

9.3 Retention periods defined for the storage of your data can be found by clicking [here](#).

## **10. Your rights**

10.1 You have the right to ask us not to contact you for marketing purposes by contacting us at [privacy@eGlobal.me](mailto:privacy@eGlobal.me) or by adjusting your notification preferences in the “Settings” section of your account page.

10.2 You have the right to correct any personal information. We hold on you that is inaccurate, incorrect, or out of date.

10.3 You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which eGlobal is subject to.

10.4 You have the right to transfer your personal data between data controllers, for example, to move your account details from one online platform to another.

10.5 Our Platform services may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. 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 for them. Please check these policies before you submit any personal data to these websites.

## **11. Access to information**

11.1 Subject to applicable laws, you may have the right to access information we hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation.

## **12. Changes to our privacy policy**

12.1 Any changes we may make to our privacy policy will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

## **13. Contact**

13.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [legal@eGlobal.me](mailto:legal@eGlobal.me).