

## **PRIVACY POLICY**

- 1 DA Financial Service (S) may collect, use, disclose, transfer and/or process the Customer's Personal Data for one or more of the following purposes:
- (a) considering and/or processing the Customer's application for an Account with DA Financial Service (S). You directly provide to us the majority of information we collect by completing the account application and related documentation. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your portfolio and trading activity, and contact you with account information. The collected information helps us improve our services to you, customize your browsing experience, and inform you about additional products, services, or promotions that may be of interest to you;
  - (b) opening, facilitating, processing, dealing with, administering, managing and/or maintaining the Customer's Account with DA Financial Service (S), including but not limited to updating the Customer's Personal Data (and where the Customer is a corporation, including the Personal Data of any authorized persons of the Customer) executing the Customer's instructions with respect to any Transactions, processing the Customer's Orders, processing payments made to and from the Customer's Account;
  - (c) carrying out the Customer's Orders or responding to any enquiry given (or purported to be given) on the Customer's behalf;
  - (d) contacting the Customer or communicating with the Customer via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of facilitating, processing, dealing with, administering and/or managing the Customer's Account with DA Financial Service (S) such as but not limited to sending the Customer Daily Trading Statement(s), Monthly Trading Statement(s) and/or notices with respect to updating the Customer's Personal Data (and where the Customer is a corporation, including the Personal Data of any authorised persons of the Customer). The Customer acknowledges and agrees that such communication by DA Financial Service (S) could be by way of the mailing of correspondence, documents or notices to the Customer, which could involve disclosure of certain Personal Data about the Customer to bring about delivery of the same as well as on the external cover of envelopes/mail packages;
  - (e) dealing in any matters relating to the Services and/or facilities which the Customer is entitled to under the Customer's Account with DA Financial Service (S);
  - (f) carrying out due diligence or other screening activities (including anti-money laundering, "know-your-Customer", credit and background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by DA Financial Service (S);
  - (g) to prevent or investigate any fraud, unlawful activity or omission or misconduct, whether relating to the Customer's Account with DA Financial Service (S) or any other matter arising

DA Financial Service (S) Pte Ltd  
(Company Registration 201606961C)  
6 Raffles Quay, #16-01  
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from the Customer's Account with DA Financial Service (S), and whether or not there is any suspicion of the aforementioned;

- (h) complying with or as required by any Applicable Laws, governmental or regulatory requirements of any relevant jurisdiction and the requirements of any relevant Market, including meeting the requirements to make disclosure under the requirements of any law binding on DA Financial Service (S) and/or for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which DA Financial Service (S) is expected to comply. Without prejudice to the generality of the foregoing, to disclose to any exchange, market, clearing house, depository or depository agent or any other relevant person any and all information on the Customer and its Account(s) and Transactions including (i) such information as may be necessary to monitor any foreign ownership or other limits imposed by or on an issuer of Capital Markets Products on the holding of any Capital Markets Products and (ii) such information as may be required to fulfil any statutory obligation imposed on the exchange, market or clearing house or under any Applicable Laws;
- (i) complying with or as required by any request or direction of any governmental authority; or responding to requests for information from public agencies, ministries, statutory boards or other similar authorities (including but not limited to MAS). For the avoidance of doubt, this means that DA Financial Service (S) may/will disclose the Customer's Personal Data to the aforementioned parties upon their request or direction;
- (j) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve its Services or Products or facilities in order to enhance the Customer's Account with DA Financial Service (S) and/or for the Customer's benefit;
- (k) storing, hosting, backing up (whether for disaster recovery or otherwise) of the Customer's Personal Data, whether within or outside Singapore;
- (l) if so consented by the Customer, providing the Customer with marketing, advertising and promotional information, materials and/or documents relating to the products and/or Services provided by DA Financial Service (S) (including the products and/or Services of third party merchants whom DA Financial Service (S) may collaborate or tie up with) that DA Financial Service (S) may be selling, marketing, offering or promoting, (whether such products or Services exist now or are created in the future) which in its opinion may be of interest or benefit to the Customer (the "**Marketing Purpose**") by way of phone/voice call, text message and/or fax message, email and/or postal mail and/or through other modes of communication that is not any of the foregoing modes, in compliance with the PDPA. The Customer may opt out of this or withdraw from this at any time by sending an email to our Data Protection Officer at [pdpa@directaccess.com.sg](mailto:pdpa@directaccess.com.sg).
- (m) Notwithstanding (l) above, even if the Customer has not separately provided express consent as aforementioned in (l) above, DA Financial Service (S) reserve our right to send a specified text message (as defined in Singapore's Personal Data Protection (Do Not Call Registry)

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Regulations 2013 (the “**DNC Regulations**”) (as defined in the DNC Regulations) (i.e. a marketing text message) to the Singapore telephone number, if:

- (i) there is an ongoing relationship between the Parties and the purpose of the message is related to the subject of the ongoing relationship, pursuant to the requirements and conditions of PDPA and its subsidiary legislation; or
  - (ii) the law permits; and
  - (o) any other purpose for which DA Financial Service (S) has specifically obtained the Customer’s consent (collectively, the “**Purposes**”).
- 2 The information we collect directly from you includes information required to communicate with you, including your name, mailing address, mobile phone number and email address; and to identify who you are, including taxpayer identification number; and employer’s name and address.

To assess your experience in margin use and trading, we may also collect your approximate annual income and approximate net worth, to assess your financial position.

We also collect demographic information when you register through the site or request information on our products, including gender, birth date, education, occupation.

The information we collect indirectly from you includes your Internet Protocol (IP) address, browser type, operating system, Internet Service Provider (ISP), time stamps, transactions placed, products or services used, prior and following website you view, and banner ads you click. We do this through the use of cookies, which are small text files sent from the Web server to your computer. Cookies help us to know you better by providing operational data we can use to aid your interaction with our website and improve its security, navigation, and usability.

As the purposes for which DA Financial Service (S) may/will collect, use, disclose, transfer or process the Customer’s Personal Data depend on the circumstances at hand, such purpose may not appear above. However, DA Financial Service (S) will notify the Customer of such other purpose at the time of obtaining the Customer’s consent, unless processing of the Customer’s Personal Data without the Customer’s consent is permitted by the PDPA or by law.

- 3 DA Financial Service (S) may/will also be collecting from sources other than the Customer, Personal Data about the Customer, for one or more of the above Purposes, and thereafter using, disclosing and/or processing such Personal Data for one or more of the above Purposes.
- 4 DA Financial Service (S) may/will need to disclose and/or transfer the Customer’s Personal Data to third party, whether located within or outside Singapore, for one or more of the above Purposes, as such third party, would be processing the customer’s Personal Data for one or more of the above Purposes. In this regard, the Customer hereby acknowledges, agrees and consents that DA Financial Service (S) may/is permitted to disclose the Customer’s Personal Data to such third party (whether located within or outside Singapore) for one or more of the above Purposes and for the said third party to subsequently collect, use, disclose and/or process the Customer’s Personal Data

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for one or more of the above Purposes. Without limiting the generality of the foregoing or of this Clause, such third party include:

- (a) any entity related to DA Financial Service (S) or its Affiliates;
  - (b) any intermediary, agents, contractors or third party service providers that process or will be processing the Customer's Personal Data on behalf of DA Financial Service (S), including but not limited to those which provide administrative or other services (such as mailing houses, telecommunication companies, information technology companies and data centers);
  - (c) any government or regulatory authorities in Singapore and elsewhere where disclosure is required by the Applicable Laws;
  - (d) auditors and legal advisors of DA Financial Service (S); and/or
  - (e) third party service providers or agents, which may be sited in or outside of Singapore, for the above Marketing Purpose; and the Customer also consent to such third party service providers or agents of DA Financial Service (S) processing the Customer's Personal Data (including sending the Customer such marketing, advertising and promotional information, materials and/or documents by way of postal mail, electronic transmission to the Customer's email address(es), voice call / phone call, SMS/MMS and/or fax), VOIP based smart phone application such as Whatsapp, Viber, etc. for the above Marketing Purpose (collectively, the "Permitted Parties").
- 5 Personal identifying information may be reviewed, changed, or corrected at any time. You are responsible for maintaining the accuracy and completeness of your personal and other information. If you would like to review your personal information, believe that any of your information is incorrect, have questions regarding your personal information, or have any other questions or concerns regarding this personal data protection policy, simply contact DAFS for assistance at [pdpa@directaccess.com.sg](mailto:pdpa@directaccess.com.sg).
- 6 The Customer may request to access and/or correct the Customer's Personal Data currently in the possession or control of DA Financial Service (S), by submitting a written request to DA Financial Service (S)'s Data Protection Officer at [pdpa@directaccess.com.sg](mailto:pdpa@directaccess.com.sg).

Please note that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request. We will respond to your request as soon as reasonably possible. Should we not be able to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within thirty (30) days of the time by which we will be able to respond to your request. If we are unable to provide you with any personal data or to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

- 7 The Customer may withdraw the Customer's consent for the collection, use and/or disclosure of the Customer's Personal Data in the possession or control of DA Financial Service (S), by submitting a written request to DA Financial Service (S)'s Data Protection Officer.

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- 8 DA Financial Service (S) will take reasonable efforts to ensure that the Customer's Personal Data is accurate and complete. This means that the Customer must also update DA Financial Service (S) of any changes in the Customer's Personal Data and the Customer agrees that the Customer will do so. DA Financial Service (S) will not be responsible for relying on inaccurate or incomplete Personal Data arising from the Customer.
- 9 DA Financial Service (S) will also put in place reasonable security arrangements to ensure that the Customer's Personal Data is adequately protected and secured.
- 10 If the Customer has any feedback, complaint or grievance regarding about how DA Financial Service (S) is handling the Customer's Personal Data or about how DA Financial Service (S) is complying with the PDPA, the Customer may contact DA Financial Service (S).
- 11 We reserve the right to change and update this Privacy Policy from time to time. We will notify changes by posting them on our website. The amended Privacy Policy will come into effect from the time that it is posted on our website.

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