

UQWallet Privacy Notice

Last Material Update: 1 Sep 2021

Introduction

Welcome to UQWallet’s Privacy Notice ("Global Privacy Notice").

We respect your privacy and we are committed to protecting your personal data. This Global Privacy Notice will inform you as to how UQPAY TECHNOLOGY (SG) PTE. LTD ("UQPAY", we, us, our) look after your personal data when using any of our products, services or applications (together the “Services”) or when visiting or using our websites, uqpay.com (“Site”) or mobile application (“App”).

This Global Privacy Notice tells you about your privacy rights and how the law protects you. Please also use the Glossary to understand the meaning of some of the terms used in the text below.

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1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how we collect and process your personal data when you visit our Site, or through your use of the Services and any data you may provide when you register for or use the Services, sign up for alerts or newsletters, contact us with a question or request for help, participate in any renewals, promotions or surveys.

The Site and the Services are not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors.

It is important that you read this Privacy Notice together with any other privacy policies or fair processing notices, we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

Controller

UQPAY TECHNOLOGY (SG) PTE. LTD is the controller and responsible for the collection of your personal data through the App. It is also subject to Singapore's Personal Data Protection Act 2012 (PDPA).

Data Protection Officer, Complaints and Contact details

We have appointed a Data Protection Officer (**DPO**) who is responsible for overseeing questions in relation to this Global Privacy Notice. If you have any questions or complaints about this notice, our privacy practices or if you have a request to exercise your rights, please contact our DPO Team in the following ways:

Email:DPO@Uqpay.com

You have the right to make a complaint about the way we process your personal data to the Information and Data Protection Commissioner (IDPC), [Singapore's supervisory authority for data protection issues](#). If you reside in an EU Member State, you have the right to make a complaint about the way we process your personal data to the supervisory authority in the EU Member State of your habitual residence or place of the alleged infringement. Information about your supervisory authority could be found here: https://ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas_en

We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority, so please feel free to contact us in the first instance.

Changes to the Privacy Notice and your duty to inform us of changes

We keep our Privacy Notice under regular review. This version was last updated on the date above written. If we change our Privacy Notice and you have already registered with us, we will let you know by email or via a notification through the app.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

The Site and App may include links to third-party websites, plug-ins and applications ("**Third Party Sites**"). Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these Third-Party Sites and are not responsible for their privacy statements. When you leave our Site or App, we encourage you to read the privacy notice of every Third Party Site you visit or use.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped in categories as follows:

Category of Personal Data	Specific Pieces of Personal Data
Identity Data	<ul style="list-style-type: none">• first name,• maiden name,• last name,• username or similar identifier,• title,• date of birth and gender,• a visual image of your face,• tax identification number,• national identity cards,• passports or other form of identification documents including proof of address such as utility bill or bank statement.
Contact Data	<ul style="list-style-type: none">• billing address,• delivery address,• home address,• work address,• email address and telephone numbers.
Financial Data	<ul style="list-style-type: none">• bank account,• payment card details,• external e-money wallet details.

Category of Personal Data	Specific Pieces of Personal Data
Transactional Data	<ul style="list-style-type: none">• details about payments to and from you,• other details of any transactions you enter into using products and services you have purchased from us.
Investment Data	<ul style="list-style-type: none">• information about your:<ul style="list-style-type: none">◦ investment objectives,◦ investment experience,◦ prior investments.
Technical Data	<ul style="list-style-type: none">• internet protocol (IP) address,• your login data,• browser type and version,• time zone setting and location data,• browser plug-in types and versions,• operating system and platform, and• other technology or information stored on the devices you allow us access to when you visit the Site or use the Services, such as friends lists or other digital content.
Profile Data	<ul style="list-style-type: none">• your username and password,• requests by you for products or services,• your interests, preferences, feedback and survey responses.
Usage Data	<ul style="list-style-type: none">• information about how you use:<ul style="list-style-type: none">◦ our Site,◦ App,◦ products and services.
Marketing and Communications Data	<ul style="list-style-type: none">• your preferences in receiving marketing from:<ul style="list-style-type: none">◦ us◦ our third parties◦ your communication preferences.

As explained above under [Identity Data](#), we will also collect a visual image of your face which we will use, in conjunction with our sub-contractors, to check your identity for onboarding purposes. This data falls within the scope of special categories of data (see Special Categories of Data below). When we ask to collect a visual image of your face you will be asked for your specific consent. You can refuse to provide this, but it means that we will be unable to register you and provide you with the Services.

Speical categories of personal data are data revealing your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, genetic and biometric data. We will only use special categories of personal data for [a specific purpose](#) and if we are able to satisfy both the [Lawful Basis](#) requirements, as well as at least one of the following additional conditions:

- You have given explicit consent;
- Processing relates to personal data which are manifestly made public by the data subject;
- Processing is necessary for the establishment, exercise of defence of legal claims, or
- Processing is necessary for reasons of substantial public interest based on Singapore State Law.

We are subject to the Singapore Anti-Money Laundering Directives and the relevant States' law implementing them which require us to process for instance information from your ID documents including a photographic picture of you. See also [row iv](#), in the table which describes the purposes for which we will use your personal data. We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your [Usage Data](#) to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

If you refuse to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you refuse to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your [Identity](#), [Contact](#) and [Financial](#) Data by filling in forms, providing a visual image of yourself via the Service, by email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
- create an account;
- subscribe to our services or publications;
- make use of any of our Services;
- request marketing to be sent to you;
- enter a competition, promotion or survey; or
- give us feedback or contact us.

Automated technologies or interactions. As you interact with us via our Site or App, we will automatically collect [Technical Data](#) about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We will also collect [Transactional Data](#) and [Investment Data](#). We may also receive [Technical Data](#) about you if you visit other websites employing our cookies. On our main website you will be informed about how we use cookies through [the Cookie Settings](#).

Third parties or publicly available sources. We also obtain information about you from third parties (such as employers, credit reference agencies and fraud prevention agencies) who may check your personal data against any information listed on other databases.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- For the provision of the Services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Please refer to the [Section Glossary](#) to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by [contacting us](#). See below for further details on marketing.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground, we are relying on to process your personal data where more than one ground has been set out in the table below.

No		Purpose/Activity	Categories of personal data	Lawful basis for processing including basis of legitimate interest
i.		To register you as a new customer	<ul style="list-style-type: none">• Identity• Contact• Financial	<ul style="list-style-type: none">• Performance of a contract with you• Necessary to comply with a legal obligation (e.g. to comply with Anti-Money Laundering requirements)

No	Purpose/Activity	Categories of personal data	Lawful basis for processing including basis of legitimate interest
ii.	<div>To process and deliver our Services and any App features to you including:<ul style="list-style-type: none">Execute, manage and process any instructions or orders, you makeManage, process, collect and transfer payments, fees and chargesCollect and recover money owed to us</div>	<ul style="list-style-type: none">IdentityContactFinancialTransactionalTechnicalMarketing and Communications	<ul style="list-style-type: none">Performance of a contract with youNecessary for our legitimate interests (e.g. to prevent abuse of our Services and promotions)
iii.	<div>To manage our relationship with you which will include:<ul style="list-style-type: none">Notifying you about changes to our terms or Privacy NoticeAsking you to leave a review or take a surveyKeep you informed of our company's business and product development</div>	<ul style="list-style-type: none">IdentityContactProfileTransactionalMarketing and Communications	<ul style="list-style-type: none">Performance of a contract with youNecessary to comply with a legal obligationNecessary for our legitimate interests (to keep our records updated, study how our customers use our products/services and how prospective customers respond to our marketing campaign)
iv.	<div>To manage risk and crime prevention including:<ul style="list-style-type: none">Detect, investigate, report and prevent financial crime in broad senseObey laws and regulations which apply to usResponding to complaints and resolving them</div>	<ul style="list-style-type: none">IdentityContactFinancialTechnicalTransactionalInvestment DataSpecial Categories Data that you give us directly or that we receive from third parties and/or publicly available sources:<ul style="list-style-type: none">special categories data which might be revealed by KYC or other background checks (for example, because it has been reported in the press or is available in public registers);special categories data that is revealed by photographic ID although we do not intentionally process this personal data;	<ul style="list-style-type: none">Performance of a contract with youNecessary to comply with a legal obligationNecessary for our legitimate interests (to develop and improve how we deal with financial crime)For Special Categories Data it's necessary for reasons of substantial public interest under the Singapore Anti-Money Laundering Directives and the relevant States' laws implementing them.
v.	<div>To enable you to partake in a prize draw, competition or complete a survey</div>	<ul style="list-style-type: none">IdentityContactProfileUsageMarketing and Communications	<ul style="list-style-type: none">Performance of a contract with youNecessary for our legitimate interests (to gather market data for studying customers' behavior including their preference, interest and how they use our products/services, determining our marketing campaign and growing our business)

		Lawful basis for processing including basis of legitimate interest	
No	Purpose/Activity	Categories of personal data	
vi.	To administer and protect our business, our Site and App(s) including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data	<ul style="list-style-type: none">• Identity• Contact• Financial• Technical• Transactional• Investment Data	<ul style="list-style-type: none">• Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)• Necessary to comply with a legal obligation
vii.	To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none">• Identity• Contact• Profile• Usage• Marketing and Communications• Technical	Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
viii.	To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none">• Technical• Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to form our marketing strategy)
ix.	To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none">• Identity• Contact• Technical• Usage• Profile• Marketing and Communications• Investment Data	Necessary for our legitimate interests (to develop our products/services and grow our business)
x.	Relevant for individuals related to partnering companies <ul style="list-style-type: none">• Corresponding with partnering organizations• Invoicing, billing and other business enquiries related to the partnering organizations• General management of relationships with partnering organizations	<ul style="list-style-type: none">• Identity (partially)• Contact (partially)	<ul style="list-style-type: none">• Performance of a contract with partnering organizations• Necessary for our legitimate interests (to develop our products/services and grow our business)

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

Promotional offers from us

We may use your [Identity](#), [Contact](#), [Technical](#), [Transactional](#), [Usage](#) and [Profile Data](#) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased from us and you have not opted out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Services or Site may become inaccessible or not function properly. For more information about the cookies we use, [please refer to our main website](#).

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. Disclosures of your personal data

We may share your personal data with our third party service providers, agents, subcontractors and other associated organizations, our group companies and Affiliates in order to complete tasks and provide the Services to you on our behalf. When using third-party service providers, they are required under written agreements, to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may pass your personal data to the following entities:

- companies and organizations that assist us in processing, verifying or refunding transactions you make via our App and in providing any of the Services that you have requested;
- identity verification agencies to undertake required verification checks;
- fraud prevention agencies to help fight against financial crime including fraud, money-laundering and terrorist financing;
- mobile application developers;
- organizations which assist us with customer service facilities;
- anyone to whom we lawfully transfer or may transfer our rights and duties under the relevant Terms & Conditions governing the use of any of the Services;
- any third party as a result of any restructure, sale or acquisition of our group or any Affiliates, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and
- regulatory and law enforcement authorities, whether they are outside or inside of Singapore, where the law allows or requires us to do so.

6. International transfers

We share your personal data within our group. This will involve transferring your personal data outside Singapore or the origin of where your personal data is collected.

Many of our external third parties are based outside Singapore and therefore their processing of your personal data will involve cross-border and transnational data transfers.

Whenever we transfer your personal data outside Singapore, we will comply with the requirements and restrictions on cross-border transfers of personal data and transnational file transfers under the Personal Data Protection Act 2012 (PDPA).

7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

Depending on the nature of the risks presented by the proposed processing of your personal data, we will have in place the following appropriate security measures:

- a. organizational measures (including but not limited to staff training and policy development);
- b. technical measures (including but not limited to physical protection of data, pseudonymization and encryption); and
- c. securing ongoing availability, integrity and accessibility (including but not limited to ensuring appropriate back-ups of personal data are held).

We have put in place procedures to deal with any suspected personal data breach and will notify you and any relevant regulator of a breach where we are legally required to do so.

8. Personal Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law, we have to keep basic information about our customers (including [Contact](#), [Identity](#), [Financial](#) and [Transactional Data](#)) for at least 5 years. For example, under the Singapore Anti-Money Laundering legislation we are obliged to retain your personal data for a period of 5 years after the end of the relationship between us as a company and you as a customer.

For the purpose of defending our legitimate interests against possible legal claims, please note that correspondence (e.g. email addresses and content, chats with the customer service team, call recordings etc.) will be kept up to 10 years, depending on the limitation period (a limitation period is a time period during which a claim can be made) applicable in your country, after the end of the relationship between us as a company and you as a customer.

Another example relates to our legitimate business need to prevent abuse of the promotions that we launch. We will retain a customer's personal data for the time of the promotion in order to prevent the appearance of abusive behavior.

Please note that under certain condition(s), you can ask us to delete your data: see [your legal rights](#) below for further information. We will honor your deletion request ONLY if the condition(s) is met.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under the data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please [contact us](#).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

Please note that the law obliges us to use all reasonable measures to verify your identity when you request access to your personal data including a copy of your personal data. We will apply all reasonable measures to verify your identity when you request the erasure of your personal data as a malicious request for erasure may put at risk your financial interests. In our case the reasonable measures will be determined having regard to the fact that we operate in the Fintech domain. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally, it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Glossary

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of a Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

11. Legal Rights Explained

You have the right to:

- Request access to your personal data (commonly known as a "**Data Subject Access Request**"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to the processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful, but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen (where technically feasible), your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

12. Translation

These Terms are concluded in the English language and all communications including any notices or information being transmitted shall be in English. In the event that these Terms or any part of it is translated (for any proceedings, for your convenience or otherwise) into any other language, the English language text of these Terms shall prevail.