

PRIVACY POLICY

This Privacy Policy (“**Policy**”) describes how personal data is collected, used, disclosed and processed when you visit our Website, our Platform and the Services provided therein, and sets out the basis which 8SIAN Sdn. Bhd. (Company Registration No.: 202201013030 (1458727P)) (“**the Company**”, “**we**”, “**us**”, or “**our**”) may collect, use, disclose or otherwise process personal data of our users in accordance with Malaysia’s Personal Data Protection Act (“**PDPA**”).

This Policy applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

By accessing or using the Platform and the Services, you consent to the information collection and data handling practices outlined in this Policy.

DEFINITIONS AND INTERPRETATION

1. As used in this Policy:

“**personal data**” means data, whether true or not, about any person who accesses and/or uses the Platform and/or the Services who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

2. Capitalised terms in this Policy shall have the meaning given to them in the Terms of Service (the “**Terms**”) as located in <https://8sian.io/8SIAN Privacy Policy.pdf>, unless the context requires otherwise. Other terms used in this Policy shall have the meanings given to them in the PDPA (where the context so permits).

GENERAL

3. Generally, we will not collect any personal data from you in the course of the minting process and/or during transactions conducted through the Services. All you need to do is to connect your digital wallet to the Website and to pass the verification process. However, some types of interaction with us may result in or require the provision of your personal data (for example, if you send an email inquiry to us or you participate in certain social events organized or hosted by us).

4. Some examples of personal data which we may collect from you include name, your social media handles (if they reveal your name), email address and telephone number. For avoidance of doubt, there are situations and interactions available on our Platform which do not require you to provide any personal data to us (for example, if you are just viewing our website).

5. The following sections of this Policy apply in the event that we do collect, use, disclose and/or process your personal data based on your usage of our Website, Platform or Services.

COLLECTION, USE AND DISCLOSURE OF PERSONAL DATA

6. We generally do not collect your personal data unless (a) it is provided to us voluntarily by you directly or via a third party who has been duly authorised by you to disclose your personal data to us (your “**authorised representative**”) after (i) you (or your authorised representative) have been notified of the purposes for which the data is collected, and (ii) you (or your authorised representative) have provided written consent to the collection and usage of your personal data for those purposes, or (b) collection, use, disclosure and/or processing of personal data without consent is

permitted or required by the PDPA or other laws. We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorised by law).

7. We may collect and use your personal data for any or all of the following purposes:
 - (a) performing obligations in the course of or in connection with our provision of the goods and/or services requested by you (including without limitation, the provision of the Services to you, and the fulfilment of transactions);
 - (b) verifying your digital wallet or identity, where we are required to do so (whether by law or otherwise);
 - (c) responding to, handling, and processing queries, requests, applications, complaints, and feedback from you;
 - (d) managing your relationship with us;
 - (e) processing payment or credit transactions;
 - (f) complying with any applicable laws, regulations, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
 - (g) any other purposes for which you have provided the information;
 - (h) where you participate in any raffles, draws or other allow-listing selection processes;
 - (i) to contact you or provide you with information, where you voluntarily join any of our social media communities (such as Discord servers, Telegram groups etc...);
 - (j) transmitting to any unaffiliated third parties including our third-party service providers and agents, and relevant governmental and/or regulatory authorities, whether in Singapore or abroad, for the aforementioned purposes; and
 - (k) any other incidental business purposes related to or in connection with the above.

8. We may disclose your personal data:
 - (a) where such disclosure is required for performing obligations in the course of or in connection with our provision of the goods and services requested by you; or
 - (b) to third party service providers, agents and other organisations we have engaged to perform any of the functions with reference to the above-mentioned purposes.

9. The purposes listed in the above clauses may continue to apply even in situations where your relationship with us (for example, pursuant to a contract) has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

10. For avoidance of doubt, certain third parties may have been involved in the part of the registration, verification, allow-listing, raffles, pre-mint or minting processes as part of our Platform and/or Services. These third parties may collect, use, disclose or process your personal data for their own purposes, and without our involvement or reference to us. We are not liable or responsible for the collection, use, disclosure or processing of your personal data by such third parties.

WITHDRAWING YOUR CONSENT

11. The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our Data Protection Officer at the contact details provided below.
12. Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.
13. Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in clause 11 above.
14. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

ACCESS TO AND CORRECTION OF PERSONAL DATA

15. If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our Data Protection Officer at the contact details provided below.
16. 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.
17. We will respond to your request as soon as reasonably possible. In general, our response will be within twenty-one (21) business days. Should we not be able to respond to your request within twenty-one (21) days after receiving your request, we will inform you in writing within twenty-one (21) 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).

PROTECTION OF PERSONAL DATA

18. To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as minimised collection of personal data, authentication and access controls (such as good password practices, need-to-basis for data disclosure, etc.), encryption of data, up-to-date antivirus protection, regular patching of operating system and other software, securely erase

storage media in devices before disposal, web security measures against risks, and security review and testing performed regularly.

19. You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

ACCURACY OF PERSONAL DATA

20. We generally rely on personal data provided by you (or your authorised representative). In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided below. Failure to do so may affect or impact our ability to provide you with our goods and services.

RETENTION OF PERSONAL DATA

21. We may retain your personal data for as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws.
22. We will cease to retain your personal data or remove the means by which the data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purpose for which the personal data was collected, and is no longer necessary for legal or business purposes.

TRANSFERS OF PERSONAL DATA OUTSIDE OF MALAYSIA

23. We generally do not transfer your personal data to countries outside of Malaysia. However, if we do so, we will obtain your consent for the transfer to be made and we will take steps to ensure that your personal data continues to receive a standard of protection that is at least comparable to that provided under the PDPA.

DATA PROTECTION OFFICER

24. You may contact our Data Protection Officer if you have any enquiries or feedback on our personal data protection policies and procedures, or if you wish to make any request, in the following manner:

Email Address: hello@8sian.io

EFFECT OF POLICY AND CHANGES TO POLICY

25. This Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.
26. We may revise this Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Policy was last updated. Your continued use of our services constitutes your acknowledgement and acceptance of such changes.

Effective date : 01/06/2022
Last updated : 17/08/2022