



COMMO T

PRIVACY POLICY

DECEMBER 2024

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1. SECTION A - INTRODUCTION

1.1 Introduction

Protecting your privacy and keeping your personal information confidential is very important to us. This Privacy Policy ("Policy") sets out how we collect and manage your personal and sensitive information.

In this Policy, we use the terms "we" "us" "our" or "Commo T" to refer to Commo T and its related companies.

Personal information is any information or opinion about you that is capable (or reasonably capable) of identifying you, whether the information or opinion is true or not, and regardless of whether the information is recorded in a material form.

Sensitive information includes things like your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record. Your health, genetic and biometric information and biometric templates are also sensitive information. Sensitive information is also personal information for the purposes of this Privacy Policy.

We collect personal and/or sensitive information to provide you with the products and services that you ask for, as well as information about products and services offered by us or third parties.

We may use your personal and/or sensitive information to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and pre-vent illegal activity. We cooperate with police and other enforcement bodies as required by law.

We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please let us know so that we can correct it. If we deny access to your personal information, we'll let you know the reason why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than provide you with direct access to evaluative information connected with the decision.

2. SECTION B – COLLECTION OF PERSONAL INFORMATION

2.1 Why we collect personal information

We only collect personal information when it's reasonably necessary for us to do business with you.

We use your personal information to:

- verify your identity;
- provide you with the products and services that you've asked for;
- help us monitor, evaluate and develop our products and services;
- enable secure access to our client area;
- unless you tell us otherwise, keep you informed about our products and services and those of our relevant business and initiative partners, and tailor this information to your needs and interests;
- respond to any feedback, queries or complaints;
- provide you with technical support;
- participate in any third-party acquisition or potential acquisition of an interest in us or our assets;
- comply with our legal obligations under the applicable laws; and
- take measures to detect and prevent fraud, crime or other activity which may cause harm to our business or our products and services.

2.2 Information we may collect

The personal information we collect about you generally includes the following:

- name;
- date of birth;
- postal or email address; or
- phone numbers, including home, mobile and work;
- fax number;
- information relating to an individual's source of wealth;
- occupation;
- credit card details;
- bank account details, including institution name, branch, account name, bank identifier, and account number or IBAN;
- information relating to your trading experience;
- identification documentation, as required under the Anti-Money Laundering policy;
- a Veda Check or other credit or bankruptcy check; and/or
- other information we consider necessary to our functions and activities.

We are required by law to identify you if you're opening a new account or adding a new signatory to an existing account. The AML policy requires us to sight and record details of certain documents (i.e. photographic and non-photographic documents).

Where necessary, we also collect information on the following individuals:

- trustees;
- partners;
- company directors and officers;
- officers of co-operatives and associations;
- client's agents;
- beneficial owners of the client; and
- persons dealing with us on a "one-of" basis.

We may take steps to verify the information we collect. For example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a credit application is accurate.

2.3 How we collect personal information

We may either collect personal information about you directly from you or from sources other than you when permitted under the AML/CTF Act. "Sources other than you" may include your agents, family members, friends, related entities, affiliates or divisions.

We may also collect information from you electronically, for instance, when you visit our web-site.

2.4 Incomplete or inaccurate information

If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services that you ask for.

2.5 Consent

In most cases, we'll obtain your consent to use and disclose your personal information for our intended purposes either before or at the time that we collect it.,

If you don't give us your consent or withdraw your consent, we may not be able to provide you with the products or services you ask for.

2.6 Withdrawing consent

You can withdraw your consent at any time. To withdraw your consent, please email support@glexchange.com in the first instance.

2.7 Sensitive information

We will only collect sensitive information about you if we have your consent, or if we are required or authorised by law.

2.8 Aggregated Data

Aggregated data is general data about groups of people which doesn't identify anyone personally, for example the number of people in a particular industry that engage in forex trading. We use aggregated data to:

- help us to understand how you use our products and services and improve your experience with us; and
- customise the way that we communicate with you about our products and services so that we can interact with you more effectively.

We may share aggregated data with our business or industry partners.

2.9 Anonymity and pseudonymity

In certain situations, we may be able to give you the option of using a pseudonym or remain anonymous when you deal with us. We're only able to provide you with this option when it's practical for us to do so, and if we're not required by law to identify you.

2.10 Unsolicited personal information

If we receive personal information about you that we haven't ask for, we'll only retain it if we determine that:

- the information received is reasonably necessary for us to do business with you; and
- you've either consented to the information being collected, or it wasn't practical or reasonable for us to obtain your consent in the circumstances.

If these conditions aren't met, we will destroy or de-identify the information.

If the unsolicited information we receive about you is sensitive information, we'll get your consent to retain it, regardless of what the circumstances are.

3. SECTION C – INTEGRITY OF YOUR PERSONAL INFORMATION

3.1 Quality of personal information

We ensure that the personal information we collect and handle is accurate, up to date, complete and relevant.

Please contact us if any of the details you have provided to us change or if you believe that the information, we have about you isn't accurate or up to date.

We may also take steps to update the personal information we hold, for example, an address, by collecting personal information from publicly available sources such as telephone directories or electoral rolls.

3.2 Security of personal information

We are committed to protecting the personal information we hold about you from misuse, unauthorised access and disclosure.

We have implemented a range of practices and policies to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

3.3 Our security measures

- educating our employees about their obligations when they collect and handle personal information;
- requiring our employees to use passwords when accessing our systems;
- encrypting data sent from your computer to our systems during internet transactions and client access codes transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- practising a clean desk policy for all premises and providing secure storage for physical records; and
- employing physical and electronic security measures such as swipe cards, alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

Where we identify that we no longer need certain personal information, we ensure that it's effectively and securely destroyed. For example, we may shred paper records or use other means such as deletion in the case of electronic equipment and records.

4. SECTION D – USE OR DISCLOSURE OF PERSONAL INFORMATION

4.1 Who we disclose information to;

We may share your information with our related entities and third parties that we outsource functions to or partner with, in certain limited situations where it's necessary for us to provide our products and services or perform associated business activities.

These entities and third parties include:

- brokers and agents who refer your business to us;
- our third-party business partners or joint initiative providers;
- auditors we appoint to ensure the integrity of our operations;
- any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- your employment referee (to confirm details about you);
- if required or authorised to do so, regulatory bodies and government agencies;
- credit reporting agencies;
- other financial institutions and organisations that you seek credit from them (at their request, so that they may assess whether to offer you credit); and
- other organisations who assist us to provide products and services by performing functions such as client contact, banking, payments, data processing, debt recovery, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement our products and services.

We take our obligations to protect your information extremely seriously and make every effort to deal only with parties who share and demonstrate the same attitude. Each of the third parties that we contract with is carefully selected and is only authorised to use your personal information in a secure way, that's necessary for them to perform their services to us.

4.2 Disclosure required by law

We will also disclose your personal information if we're required by law or permitted to do so under the Privacy Policy.

5. SECTION E – DIRECT MARKETING

Unless you have asked us not to, we may use your personal information to let you know about new or improved products and services and special offers that may be of interest to you.

If you don't want us to use your personal information for marketing purposes, please:

email us at support@glexchange.com or

post a letter to the attention of the Head of Compliance at: Commo T, No. 64A Street 294, Sangkat Boeung Keng Kang 1, Khan Chamkarmon, Phnom Penh.

6. SECTION F - COOKIES

6.1 What is a cookie

A cookie is a small file which asks permission to be placed on your computer's hard drive. If your computer settings allow cookies, then the file is added and the cookie helps analyse web traffic or lets the site owner know when you visit a particular site.

6.2 Why we use cookies

Cookies help us provide you with a better website by enabling us to monitor the pages that you find useful and tailor our website to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns, and doesn't identify you or anyone else as an individual.

We may disclose the data we collect through cookies to our related companies.

6.3 How to block cookies

Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

7. SECTION G – CROSS BORDER DISCLOSURE OF PERSONAL INFORMATION

Some of our related companies and third parties that we share information with may be located outside of Cambodia. These entities may be located in the United Kingdom, the United States, Thailand, China, Russia and other countries. We will only disclose your personal information to an offshore recipient once we have taken reasonable contractual and practical steps to ensure that:

- the overseas recipient doesn't breach the Privacy Policy; or
- you'll be able to take action to enforce the protection of a law or binding scheme that has the effect of protecting the information in a way that's at least substantially similar to the way in which the Privacy Policy protects the information; or
- you've consented to the disclosure after we expressly tell you that there's no guarantee that the overseas recipient won't breach the Privacy Policy; or
- the disclosure of the information is required or authorised by or under a Cambodian law or a court/tribunal order; or
- a permitted general situation exists in relation to the disclosure of the information.

8. SECTION H – GOVERNMENT IDENTIFIERS

We won't adopt a government related identifier (such as your driver's license number) as our own identifier unless required or authorised to do so under a Cambodian law, regulation or court/tribunal order.

Before using or disclosing a government related identifier, we will ensure that such use or disclosure is:

- reasonably necessary for us to verify your identity for the purposes of doing business with you; or
- reasonably necessary for us to fulfil our obligations to a government agency or a State or Territory authority; or
- required by or authorised under Cambodian law, regulation or a court/tribunal order; or
- within a permitted general situation; or
- reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

9. SECTION I – ACCESS AND UPDATING PERSONAL INFORMATION

If you've provided us with personal information, you have the right to request to access or correct it.

Requests for access to or correct limited amounts of personal information, such as checking to see what address or telephone number we have recorded, can generally be handled over the phone.

We will respond to your request as soon as we're able to. In some cases, we may ask you to pay an administrative fee to cover costs associated with your request. We will confirm the cost with you and confirm that you want to proceed before actioning your request.

We will endeavour to comply with your request within 30 days of hearing from you. To help us respond, please include as much detail as possible about the information that you want to access or correct and, if relevant, how you'd like to access the information.

We will always confirm your identity before providing you with access to your personal information.

9.1 Exception and refusal to give access

In some circumstances we might have to deny your request for access or correction, or limit the access we provide. In either of these situations, we'll let you know the reasons for our decision in writing. If you disagree with our decision, you can make a complaint following the process set out in section J of this Policy.

You have the right to ask for a copy of any credit report we have obtained about you from a credit-reporting agency. However, the best means of obtaining an up-to-date copy is to get in touch with the credit-reporting agency directly, as we may not have retained a copy after we have used it, in accordance with the Privacy Policy.

You have a right to have any inaccuracies corrected or, if there's any dispute about accuracy, to have a note added to your credit reporting agency file explaining your position.

If we decline your credit application wholly or partly because of adverse information on your credit report, the Privacy Policy requires us to let you know and tell you how you can go about getting a copy of your credit report.

A major credit-reporting agency is Veda Advantage Business Information Services Limited. It's likely that you will need to contact this agency to access an up-to-date copy of your credit report and any correction of information on your file.

9.2 Contact

If you have any questions or would like further information about our privacy and information handling practices, please contact us using one of the following channels:

email us at support@glexchange.com or

post a letter to the attention of the Head of Compliance at: Commo T, No. 64A Street 294, Sangkat Boeung Keng Kang 1, Khan Chamkarmon, Phnom Penh.

10. SECTION J - COMPLAINTS

10.1 Making a complaint

We offer a free internal complaint resolution scheme to all of our clients. If you have a privacy complaint, please contact us using the details above to discuss your concerns.

To assist us in helping you, please gather all supporting information and any documents relating to your complaint and provide it to us for assessment. We will try to resolve your complaint as quickly as possible, and in any event within 30 days of hearing from you. If your complaint takes longer to resolve, we will keep you informed of our progress.