

Updated as of 1 June 2019

These terms (“**Privacy Policy**”) set out how we, QianNow Private Limited, collect, use, manage and protect your personal data for purposes of the Singapore Personal Data Protection Act (“**PDPA**”).

By visiting our Website and/or Mobile Application and using our Platform, you agree to be bound by the terms of this Privacy Policy, as may be revised or updated by us from time to time, and consent to us collecting, using and disclosing your personal data in the manner set forth below.

Type of personal data collected

We variously collect the following type of personal data from visitors to our Website, Mobile Application and/or users of our Platform:

- (a) information that you provide when registering or opening an account with us;
- (b) details of your usage of our Website, Mobile Application and/or Platform;
- (c) information regarding transactions that you effect over our Website, Mobile Application or Platform;
- (d) if consent is provided, information collected from your mobile and/or Web browser; and
- (e) other personal data that you may provide to us from time to time.

How do we collect such personal data

We may variously collect your personal data in one or more of the following ways:

- (a) when you submit such data to us;
- (b) when you interact with us, whether over the telephone, via email, in person or otherwise;
- (c) when you undertake any transactions using our computer systems or network; or
- (d) through the use of cookies (or similar technology) when you browse our website.

Use of personal data

We use your personal data to:

- (a) administer our Website, Mobile Application and Platform, including for legal and compliance purposes;
- (b) administer and manage our relationship with you;
- (c) allow you access and to use the functionality of our Website, Mobile Application and Platform;
- (d) allow us to perform credit and other assessments on you in order for us to extend our financial services (including the provision of loans) to you;
- (e) publish information about you in accordance with our Website Terms, Mobile Application Terms and Platform Terms;
- (f) send you notices, reminders, communications, statements of account, contracts, payment receipts and invoices;
- (g) personalise our services to you;
- (h) send you marketing and promotional materials relating to services provided by our sister companies under the Minterest Group and our partners;

- (i) comply with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;
- (j) facilitate any other purposes reasonably related or ancillary to the above purposes; and
- (k) facilitate any other purposes for which your specific consent was obtained or given.

Disclosure of personal data

Subject to the terms of this Privacy Policy, we may, from time to time, engage third party intermediaries, agents and/or sub-contractors to assist us in our operations and may be required to disclose your personal data to such persons for this purpose. Further, we may disclose your personal data in compliance with applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities.

Withdrawal of consent

If you wish to withdraw your consent to our collection, use or disclosure of your personal data in accordance with this Privacy Policy, you may do so by notifying us in the manner specified below.

We may require up to 3 weeks from the date of your notification to duly respond to the request and effect any necessary changes (including, where applicable, conveying such notification to any relevant third party that we work with).

Depending on the extent to which you withdraw consent to our use of your personal data for any purpose(s), such withdrawal may be considered a termination by you of any agreement with us and, to the extent that any such purpose(s) are intrinsic to the provision of our services to you, we reserve the right to immediately discontinue or cease the provision of such services. In the event that such withdrawal is considered a termination by you of any agreement or results in the closure of your account with us, your account will only be closed upon the maturity of all outstanding loans taken by yourself and we will require up to 3 weeks from the maturity date of the last outstanding loan which you have taken to effect any necessary changes to our collection, use or disclosure of your personal data.

In so far as your personal data is being collected by cookies, you may disable the use of cookies on your internet browser when accessing our Website. This, however, may result in a total or partial loss of the functionality of our Website and Platform or delay or affect the way in which our Website and Platform operate, for which we accept no liability.

Access and/or changes to personal data

You may, at any time, contact us, in the manner specified below, to request changes to or to obtain information about the personal data that we have collected from you and how we have used it, as well as to change your specific marketing-related preferences.

Please note that we are not required, under the PDPA, to allow access to and correction of personal data in certain situations. The PDPA also allows us, and we reserve the right, to charge a reasonable

fee for the handling and/or processing of any requests to access personal data in accordance with this clause.

We may require up to 3 weeks from the date of notification to duly respond to a request for access or correction of personal data and to effect any necessary changes (including, where applicable, conveying such request or notification to any relevant third party that we work with).

Retention of your personal data

We shall retain your personal data as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

Protection of your personal data

We shall implement reasonable security arrangements to maintain the confidentiality and to prevent any unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks to or of any personal data in our possession (including using firewalls and other technology and/or security procedures to secure our computer network and prevent unauthorized access thereto).

We will take reasonable steps to ensure that any third party who receives personal data from us protects such data in a manner consistent with this Privacy Policy and shall not use such personal data for any purpose(s) other as specified by us, in accordance with the terms of this Privacy Policy. Wherever possible, these obligations will be incorporated into the terms of our written agreements with such third parties.

If we transfer any personal data outside Singapore, we will take reasonable steps to ensure that such data receives a standard of protection comparable to that accorded under the PDPA.

For the avoidance of doubt, we shall not be responsible in any way for the security and/or management of any personal data which you share with any third party websites accessible via links on our Website or Mobile Application.

Updates to our Privacy Policy

We may from time to time update the terms of this Privacy Policy to, inter alia, meet our business objectives and/or ensure compliance with applicable laws. Such updates will be duly notified on our Website and Mobile Application and via email notifications to registered Borrowers of our Platform but you shall, nonetheless, remain primarily responsible for keeping yourself updated of the latest terms from time to time.

Communications and Notifications pursuant to this Privacy Policy

If you have any questions or wish to send us any communication or notification regarding this Privacy Policy or any of your personal data in our possession, you may write to or contact our designated Data Protection Officer at:

Email: grace@qiannow.com

Tel: +6563868623

Attention: Data Protection Officer

Governing law and jurisdiction

This Privacy Policy shall be governed by Singapore law and you agree to irrevocably submit to the exclusive jurisdiction of the Singapore courts in connection with any dispute arising out or in relation thereto.