International Privacy Policy

Last Updated: December 25, 2017

1. LIQNET's Commitment to Privacy

At LIQNET, we know how important privacy is to our users. That is why we are committed to maintaining the confidentiality, integrity, and security of personal information about our users. We collect only what we need and will not share your personal information with any third parties other than our identity verification partner. Even within LIQNET, access to your personal information is limited to a subset of employees who work on compliance and identity verification matters. We encourage you to print/download and carefully store this information.

2. Control of Information

For the purpose of data protection legislation, the data controller is LIQNET. When we refer to "LIQNET" in this policy, we refer to this entity.

3. Purpose

This Privacy Policy is designed to let you know how LIQNET and its affiliates (collectively, "LIQNET"), collect, use, store, share and protect your personal information. This Privacy Policy explains the data collection and use practices of the liqnet.com website and the LIQNET Services (as defined in the User Agreement). The terms "you," "your," and "yours" refer to the customer/purchaser utilizing our website. The terms "LIQNET," "we," "us," and "our" refer to LIQNET. By using this website or any LIQNET Services, you consent to the practices prescribed in this statement. We may amend this Privacy Policy at any time by posting a revised version on our website. If the revised version includes a substantial change (as determined in our sole discretion), we will provide you with 30 days' prior notice by posting notice of the change on the "Privacy Policy" page of our website. It is recommended that you visit this page frequently to check for changes.

4. How we collect information

When you visit We collect information that is generated from your use of our Services and that you provide to us (such as when you register for a LIQNET Account as further explained in paragraph 5 below).

The LIQNET website or use the Services, we collect information sent to us by your computer, mobile phone, or other access device. This information may include your IP address, device information including, but not limited to, identifier, name, and type, operating system, mobile network information and standard web log information, such as your browser type, and the pages you accessed on our website.

When you use a location-enabled device with our Services, we may collect geographical location data or use various means to determine the location, such as sensor data from your device that may, for instance, provide data on nearby cell towers and wi-fi access spots.

5. Registration Process; Identity Verification

If you create an account or use the Services, we may collect and store the following types of information:

- Contact information - your name, address, phone, email and other similar information.
- Financial information - the full bank account numbers and/or credit card numbers that you link to your LIQNET Account or give us when you use LIQNET Services.

Before permitting you to use the Services, we may require you to provide additional information (such as a date of birth, passport number, numbers that you may use or have registered with your local tax authority, or other data which can be used for personal identification purposes and that may be required to comply with applicable laws) so that we can verify your identity or address. We may also obtain information about you from third parties such as identity verification services.

When you use the Services, we collect information about your transactions (such as date, time and amount of transaction) and your other activities on our website and we may collect information about your computer or other access device for fraud preventionpurposes.

We may collect additional information about you through your interactions with our support team.

6. How we use cookies

When you access our website or content or use our application or the Services, we (or Google Analytics on our behalf) may place small data files called cookies on your computer or other device. We use these technologies to recognize you as a LIQNET user; customize the Services, content, and advertising; measure promotional effectiveness and collect information about your computer or other access device to mitigate risk, help prevent fraud, and promote trust and safety.

7. How we protect and store personal information

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user.

We take the privacy and security of your information very seriously. We store and process your personal information on our computers in the Singapore, US and other countries where LIQNET facilities or our service providers are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure, and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls. We also authorize access to personal information only for those employees who require it to fulfill their job responsibilities. All of our physical, electronic, and procedural safeguards are designed to comply with applicable laws and regulations.

8. How we use the personal information we collect

We are sometimes required to compare the personal information you provide to third party databases in order to verify its accuracy and confirm your identity. This allows us to comply with state and federal anti-money laundering and "know your customer" regulations.

9. Marketing

We will never sell or rent your personal information to third parties. We may combine your information with information we collect from other companies and use it to improve and personalize the Services, as well as our content and advertising.

LIQNET may use your name and email address to provide you with information about products or services that may be of interest to you, but we will not use your personal information without complying with applicable laws and, where appropriate, obtaining your consent.

10. How we share personal information with other parties

We may share your personal information with:

- Our banking partners (if you link a bank account, debit card, or credit card to your account)
- Companies that we plan to merge with or be acquired by. (Should such a combination occur, we will require that the new combined entity follow this Privacy Policy with respect to your personal information. You will receive prior notice of any change in applicable policy.)
- 3rd party identification services for fraud prevention purposes.
- Law enforcement, government officials, or other third parties when:
    - We are compelled to do so by a subpoena, court order, or similar legal procedure; or
    - We believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss,

to report suspected illegal activity or to investigate violations of our User Agreement.

- Other third parties with your consent or direction to do so.

LIQNET will not provide your personal information to any other LIQNET users without your consent or direction.

The data that we collect from you will be transferred to, and stored at, a destination in the US and may be transferred and/or stored to other places outside the European Economic Area (EEA). It may also be processed by staff operating outside the EEA who work for us or for one of our service providers. These staff may be engaged in the fulfilment of our Services and/or the processing of your details and the provision of support services. By submitting your personal data, you agree to this transfer, storing, or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. Third parties may be located in other countries where the laws on processing personal information may be less stringent than in your country.

Our Services may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates (including, but not limited to, websites on which the LIQNET app or the Services are advertised). If you follow a link to any of these websites, please note that these websites and any services that may be accessible through them have their own privacy policies and that we do not accept any responsibility or liability for these policies or for any personal information that may be collected through these websites or services, such as contact and location data. Please check these policies before you submit any personal data to these websites or use these services.

11. How to Change Your Personal Information

You may access, review and edit your personal information at any time by logging in to your LIQNET Account and clicking on "Profile".

You have the right to:

- request access to all personal information we collect about you;
- require us to correct any personal information which is inaccurate; and
- be informed of the kinds of personal information held by us.

Your right of access to personal information held about you can be exercised in accordance with the data protection legislation.

12. Children's privacy

We do not knowingly solicit or collect information from individuals under the age of 14 or knowingly allow anyone under 18 to register with our Services. If we become aware that a child under the age of 14 has provided us with personal information, we will delete such information from our files immediately.

13. How you can contact us about privacy questions

If you have questions or concerns regarding this policy (including requests for access to personal information and/or correction of personal information), you should contact us at **support@liqnet.com**.