

## **TrueMoney Privacy Policy & Statement**

TrueMoney values your privacy. It is important for us to ensure that you understand how your personal information is safeguarded and the types of information received and collected by us every time you visit our website or whenever you transact business with us.

### ***Online Security of your Personal information***

Unless you opted to be identified, you are and will remain anonymous because our website is designed to maintain your anonymity. In case personal information is required, you will be prompted by our system. This is also true in case you created an account with us and wish to access said account online, you will be required to provide information acting as an identifier. TrueMoney has put in place safeguards to protect your personal information from unauthorized use or improper access. The said safeguards may include:

- Passwords and personal identification numbers (PINs): Your passwords and PINs are unique to you, and are an important first step in protecting your information online.
- 128-bit encryption: TrueMoney uses a Secure Sockets Layer (SSL) protocol to protect personal information transmitted to us electronically. SSL transmitted information is encrypted, or scrambled, to prevent unauthorized reading of the electronic communication.

You fully understand and acknowledge that TrueMoney cannot guarantee that the personal information you inputted online will not be misappropriated, intercepted, modified, deleted or used by others despite the physical, electronic and procedural safeguards put in place and believed to provide adequate protection to your personal information as like any similar systems, they may be subject to human and operational error.

### ***Online Data Collection Tools: Improving and evaluating website functionality and effectiveness***

TrueMoney, like many organizations, sometimes gathers data, such as your IP address, to better understand how visitors navigate our websites. We may collect information about the number of new and repeat visitors, which pages a visitor visits, how long they visit, where they are geographically located and similar details. TrueMoney may also track how many users visit advertisements promoting our products and services that may appear on other company websites. All such information is collected in an unidentifiable form and is used to improve our websites' performance and functionality, create a better experience for our visitors, measure the response to web marketing campaigns and provide you with more relevant content based on your possible interests in TrueMoney content, products and services.

TrueMoney or its agents on our behalf collect this information through the use of cookies and electronic images known as web beacons.

### ***Cookies and Web Beacons***

A cookie is a small piece of information that a website sends to your computer where it is stored on your hard drive. In our effort to make your next visit to our website convenient, TrueMoney may use the information stored on your cookie. We assure you that a cookie does not identify you unless you have

chosen to provide your identity to us. Cookies cannot access other information or files from your computer. There are 2 types of cookies - session cookies and permanent or persistent cookies.

A session cookie (sometimes called a "transient" cookie) is erased when you close your Internet browser and leave our website. In some countries, only session cookies are used.

A "permanent" cookie is a file that remains on your computer when you close your Internet browser. A permanent cookie can be read only by the website that created the cookie when you revisit that site. Permanent cookies are not used in all of our jurisdictions.

Cookies can identify a visitor only if the visitor has used a website's login feature. If you ask us to save your access ID to be used the next time you visit our website, we will use a permanent cookie to store your access ID in an encrypted format on your computer so that the next time you visit the website you will be recognized when you sign in. In this way, the website can recall your preferences and provide a more customized experience.

Permanent cookies have expiry dates and are automatically deleted from your computer after their expiry date. You can also clear your stored cookies via your browser preferences on your computer. However, unless you have settings that disallow cookies, the next time you visit our website, a new cookie will be added. You can set your website browser to notify you when you receive a cookie so that you can decide whether to accept or reject it. Since the procedure for altering preferences varies by browser you should check the "Help" menu of your browser to learn how to alter your cookie preferences. Please note, however, that rejecting cookies while visiting a TrueMoney website may result in certain parts of the website not functioning correctly or as efficiently as if cookies were allowed.

The permanent cookies that may be placed on your computer by the Google Display Network relating to web marketing campaigns are used to increase the relevance of display ads you may see when you visit other websites that are serviced by the Google Display Network. To opt out of these cookies, select the opt out button on the Google Privacy Centre page.

Web beacons are a collective term used to refer to "pixel tags", "web beacons" or "clear GIF images" embedded in a web page and usually invisible to the user. Web beacons are used for many of the same purposes as cookies, allowing TrueMoney or its agents on behalf of TrueMoney to compile aggregate statistics about website usage patterns, such as how many times a link or an area on a website is clicked. All the information collected by any of these online tracking tools is non-personal and is not used in connection with any other information that could identify you personally unless you have entered your access ID and password or provided it to us through your permanent cookie.

We may share the site visit information obtained using cookies, web beacons and other similar technologies with Google Analytics or other agents to analyze online activity on our websites or in reaction to our online advertisements.

### ***Links to Websites outside of TrueMoney***

To provide website visitors with more information that may be helpful to them, some of our websites contain links to other websites that are not affiliated with or maintained by TrueMoney. We do not monitor the privacy practices of these third-party sites, and do not have authority over them. As a result,

you fully understand and acknowledge that we do not assume any responsibility for the data collection policies and procedures of these sites whatsoever.

### **Special Notice - if you are a minor under the applicable law**

Our website is not aimed at children who are regarded minors per the applicable law, and we will not collect, use, provide or process in any other form any personal information of children under such age and in any case of any age younger than 18 years old, deliberately. We therefore also ask you, if you are still considered a minor and younger than the age of 18, to please do not send us your personal information (for example, your name, address and email address). We will not bear any responsibility for such information provided to us.

If you are under the status of a minor per your applicable law and younger than the age of 18 and you nevertheless wish to ask a question or use this website in anyway which requires you to submit your personal information, please get your parent or guardian to do so on your behalf while specifying such clearly.

### **Transfer of Your Data Abroad**

By voluntarily providing us with your Personal Data, you are hereby consenting to our use of it in accordance with this Privacy Policy. Due to the nature of the Internet if you are visiting our Site from a country other than any of the Jurisdictions of TrueMoney and its affiliates, your communications will inevitably result in the transfer of information across international boundaries. If you provide Personal Data to our Site, you acknowledge and agree that such Personal Data may be transferred from your current location to the offices and servers of TrueMoney and the affiliates, agents and service providers referred to herein located in other countries. In the event that data is transferred to a country whose laws do not provide equivalent data protection, TrueMoney shall ensure adequate protection of such Personal Data in accordance with this Privacy Policy.

By visiting this web site and providing Personal Data to our Site, you consent to these transfers.

### **Interaction Between You and TrueMoney**

We are interested in your views, and we value feedback from our clients and visitors, we therefore have set up notice boards, newsgroups, feedback, email, forum facilities and/ or chat rooms. If at any time this website offers any chat rooms, notice board facilities, newsgroups etc. we may collect the personal information that you disclose.

Such information will be used in accordance with this privacy policy. However, we can of course not control and be responsible for other parties' use of the personal information which you make available to them through this website. We encourage you to be careful about what personal information you disclose in this way.

### **Comments**

The TrueMoney website may include interactive sections such as commenting areas where visitors to the site can post comments. Please remember that any information that is disclosed in these areas becomes public information and you should exercise caution when deciding to disclose your personal information. You fully understand that we are not responsible for any information published in the comments section of this website.

### **Updates and Changes**

TrueMoney reserves the right, at any time, to add to, change, update, or modify this Privacy Policy, simply by posting such change, update, or modification on the Site and without any other notice to you. Any such change, update, or modification will be effective immediately upon posting on the Site. It is your responsibility to review this Policy from time to time to ensure that you continue to agree with all of its terms.

### ***Our Privacy Commitment***

TrueMoney is committed to protecting the privacy of all personal information provided to us. TrueMoney believes that proper use of this information is important for its success; information entrusted to us is in fact needed for us to deliver appropriate products and services to you.

Our privacy commitment applies to all of our operations which include our TrueMoney Centers.

Our privacy commitment is about more than complying with applicable privacy laws; it is about doing the right thing for the millions of people whose lives we touch every day through the use of their personal information, however collected or received by us. The following principles reflect our commitment to safeguarding personal information in our care, which is under the principles of legitimate purpose and proportionality:

- We keep your personal information and the business you do with us in strict confidence.
- We collect, use or disclose personal information from you only to provide you with our products and services to help you meet your needs.
- We obtain personal information about you lawfully and fairly.
- We do not disclose personal information without your permission except where permitted or required by law or competent authority. But we may share personal information with our agents, service providers or, where permitted by law, our affiliates in connection with providing, administering and servicing our products and services on our behalf.
- Where we choose to have certain services, such as data processing, provided by third party agents or service providers on our behalf, we do so in accordance with applicable law. In some cases, we may transfer your personal information to our employees, service providers or agents located in places other than where the information was provided.
- We are responsible for all personal information in our possession, including information transferred to third parties performing services on our behalf. All such persons, wherever they are located, are required by us to protect the confidentiality of your personal information in a manner consistent with our privacy policies and practices.

- We maintain appropriate procedures to ensure that personal information in our possession is accurate and, where necessary, kept up to date. To the extent required by applicable law, you may seek a correction of your personal information if you believe that the information we have is not accurate.
- We try to respond to requests for access to - or correction of - personal information as soon as reasonably possible. In circumstances where the law does not entitle you to access, we will explain why access is denied.
- We maintain technical and organizational safeguards to protect your personal information against loss, theft, unauthorized access, disclosure, copying, use or modification. We limit access to those who have a business need to know.

### **Online Privacy**

True Money has physical, electronic and procedural safeguards to help protect personal information provided through online transactions and activities. Read more about the methods we use to help protect your information online.

On some of our websites, we may use online data collection tools to improve functionality, enhance security, evaluate the effectiveness of our websites and advertising campaigns, or provide visitors with a customized online experience. Read about our online privacy statement for more information about our use of cookies and web beacons.

### **Keeping our records accurate**

We aim to keep our information about you as accurate as possible. If you would like to review, change or delete the details you have supplied us with, please contact us as set out below.

### **Security of your personal data**

As we value your personal information, we will ensure an adequate level of protection. We have therefore implemented technology and policies with the objective of protecting your privacy from unauthorized access and improper use and will update these measures as new technology becomes available, as appropriate.

### **Contact Information**

If you have any questions, concerns or complaints about protection of your personal information at TrueMoney, please contact our offices at No. 224 (A), 1<sup>st</sup> and 4<sup>th</sup> Floor, Salomon Business Center, U Wisara Road, Bahan Township, Yangon, Myanmar or via e-mail [legal\\_group@truemoneymyanmar.com](mailto:legal_group@truemoneymyanmar.com) .

TrueMoney may update or modify this privacy commitment from time to time and this will be accessible via our website.

## **Our Privacy Policy Statement**

Privacy is about more than just protecting the personal data you may share through the use of our products and services, or when using our websites. Privacy is also about our obligation to use and disclose this information only for the purposes we have explained to you.

Your information allows us to provide you the best possible service and products and we are committed to your privacy.

Personal data refers to personal information, privileged information and sensitive personal information as defined (if any) in the applicable laws and regulations.

Personal information refers to any information, whether recorded in a material form or not, that directly ascertains the identity of an individual. This includes your address and contact information.

Sensitive personal information includes your age, date of birth, marital status, social security and other government identification numbers, policy information, health/medical and financial information.

Privileged Information is any and all forms of information which, under the court rulings and other pertinent laws, constitute privileged communication, such as, but not limited to, information which a person authorized to practice medicine, surgery or obstetrics may have acquired in attending to a patient in a professional capacity.

By providing TrueMoney with personal data, you have explicitly authorized and consented to our collection, use and processing of said data for the following legitimate and necessary purposes:

- Processing applications for our products and services, either through manual or automated processes;
- Providing, administering and servicing our products and services to help you meet your needs, including for purposes of improving/upgrading our systems and business processes or appointment of third party vendors;
- Assessing your suitability for products and services, including conducting data analytics, market research and surveys which aim to provide you with better products and services;
- Informing you of TrueMoney's products and services, including marketing or promotional information regarding products through phone calls, mail, email, SMS or other electronic channels;
- Complying with applicable laws, regulations, directives, issuances by, or agreements and obligations of TrueMoney to any competent authority, regulator, supervisory body, enforcement agency, exchange, court, quasi-judicial body or tribunal;
- Identifying, investigating and preventing financial crimes, including fraud, bribery, money laundering and terrorist financing, including but not limited to the submission of reports to the Anti-Money Laundering competent authorities;
- Enforcing and/or defending the rights of TrueMoney before any agency, court, tribunal, quasi-judicial body;

- Recognizing other lawful or legitimate commercial or business purposes necessary for the performance of, or in relation to, a contract or service to which the data subject is a party;
- When necessary or desirable in the context of an employer-employee relationship between TrueMoney and the data subject; and
- Enabling TrueMoney to exercise governance over its businesses and ensuring that risks arising therefrom are duly identified, measured, managed and mitigated.

We may also collect personal data from other sources (e.g., your employers, credit bureaus, associations/organizations, etc.) as lawfully permitted.

For Partnerships and Corporate entities, you represent and warrant that you have (a) advised your data subjects of the purpose/s of collecting personal data and disclosure thereof to TrueMoney, their rights as data subjects and other relevant information, and (b) obtained the necessary consent and authority to disclose personal data of your directors, officers, employees, members and other representatives to TrueMoney, pursuant to the applicable laws and regulations.

### **With Whom We May Disclose and Share Your Personal Data**

While bearing in mind your privacy rights, the public interest in the availability of the data and as necessary for our provision of services to you, we may disclose and share your personal data to the following:

- Any member of the TrueMoney Group, its directors, officers, employees, duly authorized representatives, related companies and affiliates;
- Third party service providers and vendors including credit card processors, data analytics and customer support providers, and IT service providers who are bound by an obligation of confidentiality. They will have access to your personal data only as necessary to perform their requested function on your behalf, and if they have adequate security and privacy standards acceptable to TrueMoney;
- Any authority, regulator, supervisory, enforcement agency, exchange, court, quasi-judicial body or tribunal;
- Professional advisers including accounting, tax, financial or legal counsel; or
- Anyone we consider necessary for purposes of providing you products and services and other purposes mentioned above.

### **Protecting Your Personal Data**

The processing of your personal data exposes you to financial, legal, regulatory or reputational risks that may result from the unauthorized processing or disclosure of personal data. TrueMoney is committed to protecting the privacy of all personal data provided to us. We maintain physical, technical and organizational safeguards to protect your personal data against loss, theft, unauthorized access, disclosure, copying, use or modification.

We limit access to those who have a business need to know. We are responsible for all personal data in our possession, including information transferred to third parties performing services on our behalf. All such persons, wherever they are located, are required by us to protect the confidentiality and privacy of your personal data in a manner consistent with our privacy policies and practices.

## Your Rights as Data Subjects

As Data Subjects, you have the following rights:

- **Right to be informed.** You have the right to be informed whether your personal data is being, or has been processed, including the existence of automated decision-making and profiling, including of any personal data breach which is likely to result in a risk for your rights and freedoms.
- **Right to object.** You have the right to object to the processing of your personal data, including processing for direct marketing, automated processing or profiling. You may also opt NOT to receive marketing information from TrueMoney.
- **Right to Access.** You have the right to reasonable access, upon written request, to the contents of your personal data that were processed. You also have the reasonable right to know the manner by which these were processed; the sources from which these were obtained; the recipients and reasons for disclosure, if any; date when your information was last modified; and information on automated processes where your information will be used as the sole basis for any decision that may significantly affect you.
- **Right to rectify erroneous data.** You have the right to correct any error in the personal data and if warranted, request immediate rectification.
- **Right to Erase or Block (right to be forgotten).** You have, based on reasonable grounds and the public interest in the availability of the data, the right to suspend, withdraw or order the blocking, removal or destruction of your personal data from TrueMoney's filing system, without prejudice to TrueMoney continuing to process personal data for commercial, operational, legal and regulatory purposes.
- **Right to secure Data Portability.** Where personal data is processed by electronic means and in a structured and commonly used format, you have the right to obtain from TrueMoney a copy of such data in an electronic or structured format that is commonly used and allows your further use.
- **Right to be indemnified for damages.** You shall be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, taking into account any violation of your rights and freedoms as data subject.
- **Right to File a Complaint.** You may file a complaint or exercise your rights above by reaching out to us through the contact details provided below. You may also raise privacy concerns to the applicable authority in your jurisdiction.

## How Long We Will Retain Your Personal Data

Your personal data will be retained by TrueMoney throughout the duration of your account and/or until expiration of the retention limit set by TrueMoney standards, industry standards, laws and regulations from account closure and the period set until destruction, disposal or anonymization of records, unless withdrawn in writing or withheld due to changes in the information supplied by the Company.

## How to Contact TrueMoney



True Money \_\_\_\_\_ [Complete per each jurisdiction]

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**Attention: Data Protection Officer**

If you have questions about this Privacy Policy and Statement, our data processing activities or your dealings with this web site, you can contact the Data Privacy Officer by telephone at Legal and Compliance Department or via e-mail [legal\\_group@truemoneymyanmar.com](mailto:legal_group@truemoneymyanmar.com) or TrueMoney Customer Service via email : [enquiry\\_mm@truemoneymyanmar.com](mailto:enquiry_mm@truemoneymyanmar.com) or phone number : +95 9 969 519999 or your account manager, as may be applicable; or by visiting any TrueMoney Agent Store or our website at <https://truemoney.com.mm/>. Our business hours are from 8:30 AM to 5:30 PM, Mondays to Fridays. Our Customer Service is available for you 24/7.

**Amendments**

TrueMoney reserves the right to change (sections of) this Privacy Statement at any time and without notice. It is recommended that you review this Privacy Statement periodically for changes.

**FAQs**

**ON DATA PRIVACY AND POLICY STATEMENTS/RIGHTS AND OBLIGATIONS**

**Q: What are examples of personal, privileged and sensitive personal information?**

A: Personal Information refers to any information, whether recorded in a material form or not, that directly ascertains the identity of an individual. This includes your address and contact information.

Sensitive personal information includes your age, date of birth, marital status, social security and other government identification numbers, policy information, health/medical and financial information.

Privileged information is any and all forms of information which, under court rulings and other pertinent laws, constitute privileged communication, such as, but not limited to, information which a person authorized to practice medicine, surgery or obstetrics may have acquired in attending to a patient in a professional capacity.

Q: How is my personal data stored?

A: All information collected from clients are stored in an application system for the purpose of providing products and servicing you. We also have offsite storage facilities for documents containing personal data of our clients. These locations may change without need of prior notice to you.

**Q: How does TrueMoney protect the personal data of its clients?**

A: TrueMoney is committed to protecting the privacy of all personal data provided to us. We maintain physical, technical and organizational safeguards to protect your personal data against loss, theft, unauthorized access, disclosure, copying, use or modification. We limit access to those who have a business need to know. We are responsible for all personal data in our possession, including information transferred to third parties performing services on our behalf. All such persons, wherever they are located, are required by us to protect the confidentiality and privacy of your personal data in a manner consistent with our privacy policies and practices.

**Q: In the event that I avail of your products and services, does that mean you now have the authority to share my personal information with others?**

A: By continuing to avail of TrueMoney's products and services, you authorize TrueMoney, its employees, duly authorized representatives, related companies and third party suppliers, to use, process and share personal data needed in the administration of your account, with any person or organization. TrueMoney only shares personal data on a need-to-know basis.

TrueMoney is required by law to disclose certain personal data to its regulators and other databases specified by relevant laws or regulations.

**Q: Who are these duly authorized representatives, related companies and third party service providers?**

A: Authorized representatives include TrueMoney's directors, officers, employees and duly authorized representatives like agents, contracted professionals and consultants/advisers.

Related companies include TrueMoney, its parent, other group affiliated and regional companies.

Third party suppliers include service providers and vendors including processors, data analytics, IT and customer support providers who are bound by an obligation of confidentiality. They will have access to your personal data only as necessary to perform their requested function on our behalf. TrueMoney has established processes to ensure that these suppliers have adequate security and privacy standards acceptable to TrueMoney.

**Q: What is data analytics?**

A: Big data analytics is the process of examining large and varied data sets - i.e., big data - to learn about market trends, customer preferences and other useful information that can help organizations make more informed business decisions and provide products and services that best suit their customers.

**Q: What do you mean by automated processing?**

A: Automated processing means using computer or computer programs to extract, process, and communicate information. This includes automated processing operations where the processing becomes the sole basis of making decisions that would significantly affect you as a data subject. TrueMoney may employ in the future automated processing to process applications.

**Q: Can I dictate the type of information I can provide to TrueMoney?**

A: Yes, you can dictate the type of information you provide to TrueMoney and any of its authorized representatives. However, this selective way of sharing your personal data may affect decisions relative to your dealings or application with TrueMoney. We are required under applicable laws and regulations or per other governing governmental bodies to know and perform due diligence on our clients by obtaining certain information and documents

**Q: Will I be informed if there is a breach in the handling of my personal information?**

A: We would like to assure you that TrueMoney is committed to always protect and conduct proper handling of personal information in accordance with our Privacy Policy and practices. Any erroneous handling will be reported immediately to concerned parties, pursuant to our reporting requirements.

**Q: What are my rights as a Data Subject? Can you explain each?**

A: As data subjects, you have the following rights:

- **Right to be informed.** You have the right to be informed whether your personal data is being, or have been processed, including the existence of automated decision-making and profiling, including of any personal data breach which is likely to result in a risk for your rights and freedoms.
- **Right to object.** You have the right to object to the processing of your personal data, including processing for direct marketing, automated processing or profiling. You may also opt NOT to receive marketing information from TrueMoney.

- **Right to access.** You have the right to reasonably access, upon written request, the contents of your personal data that were processed. You also have the reasonable right to know the manner by which these were processed; the sources from which these were obtained; the recipients and reasons for disclosure, if any; date when your information was last modified; and information on automated processes where your information will be used as the sole basis for any decision that may significantly affect you.
- **Right to rectify erroneous data.** You have the right to correct any error in the personal data and if warranted, request immediate rectification.
- **Right to erase or block (right to be forgotten).** You have, based on reasonable grounds and the public interest in the availability of the data, the right to suspend, withdraw or order the blocking, removal or destruction of your personal data from TrueMoney's filing systems, without prejudice to TrueMoney continuing to process personal data for commercial, operational, legal and regulatory purposes.
- **Right to secure Data Portability.** Where personal data is processed by electronic means and in a structured and commonly used format, you have the right to obtain from TrueMoney a copy of such data in an electronic or structured format that is commonly used and allows your further use.
- **Right to be indemnified for damages.** You will be indemnified for any damages sustained due to such inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal data, taking into account any violation of your rights and freedoms as data subject.
- **Right to file a complaint.** You may file a complaint or exercise your rights above by reaching out to us by contacting us through our email address or TrueMoney Customer Service via email: [enquiry\\_mm@truemoneymyanmar.com](mailto:enquiry_mm@truemoneymyanmar.com) or phone number: **+95 9 969 519999** or your account manager, as may be applicable; or by visiting any TrueMoney Agent Store or our website at <https://truemoney.com.mm/>. You may also raise privacy concerns to the applicable authority in your jurisdiction.

**Q: What is the retention limit provided by law on the storage of my personal information?**

A: Your personal data will be retained by TrueMoney throughout the duration of your account and/or until expiration of the retention limit set by TrueMoney standards, industry standards, laws and regulations from account closure and the period set until destruction, disposal or anonymization of records, unless withdrawn in writing or withheld due to changes in the information supplied by the Company.

## **ON OPTING OUT/IN OF RECEIVING DIRECT MARKETING INFO/MATERIALS?**

### **Q: What do you mean by direct marketing information?**

A: Direct marketing information/material refers to any communication of any advertising or marketing material which is directed to particular individuals by whatever means such as mail, email, SMS and social media

### **Q: Can I opt out/in of marketing campaign materials in the future if I change my mind?**

A: Yes, If you wish to opt out, you may email us at [enquiry\\_mm@truemoneymyanmar.com](mailto:enquiry_mm@truemoneymyanmar.com) or call TrueMoney Customer Service **+95 9 969 519999**. Otherwise, we will take it to mean that you wish to receive materials regarding financial products and services that may suit your needs.

If you have questions about TrueMoney's Privacy Statement and Policy, our data processing activities or your dealings with this web site, you can contact the Data Privacy Officer by telephone at Legal and Compliance Department or via e-mail [legal\\_group@truemoneymyanmar.com](mailto:legal_group@truemoneymyanmar.com). You may also email us call TrueMoney Customer Service via email: [enquiry\\_mm@truemoneymyanmar.com](mailto:enquiry_mm@truemoneymyanmar.com) or phone number: **+95 9 969 519999** or your account manager, as may be applicable. Our business hours are from 8:30 AM to 5:30 PM, Mondays to Fridays. Our Customer Service is available for you 24/7.