

## Privacy Policy

### 1. Our Commitment

We, UOB Kay Hian Securities (M) Sdn Bhd and its Malaysia Group of Companies including but not limited to UOB Kay Hian Wealth Advisors Sdn Bhd (hereinafter collectively referred to as "UOBKH", "our", "us" or "we"), believe in protecting your privacy. We ask that you read this privacy policy carefully as it contains important information about what to expect when we collect personal data about you and how we will use your personal data. By using any of UOBKH's platforms, products, channels, environments, or services (collectively, the "Services"), you expressly consent to the collection, use, and processing of your personal information in accordance with this Privacy Policy. This includes, but is not limited to, the collection and use of information for the purposes outlined in the sections of this Privacy Policy. The Personal Information that we collect is used for providing and improving the Services. We will not use or share your information with anyone except as described in this Privacy Policy. The terms used in this Privacy Policy have the same meanings as in our Terms and Conditions, which is accessible at UTRADE / UWEALTH website unless otherwise defined in this Privacy Policy.

### 2. Privacy Policy Coverage

Services This Privacy Policy applies to all and any personal data collected by UOBKH through its Services including but not limited to:

Websites: UOBKH's official websites, including <https://www.utrade.com.my>, <https://cob.utrade.com.my> and <https://www.uwealth.com.my>.

Applications: Any web, mobile and/or desktop applications distributed by UOBKH listed below:

- i. UTRADE MY
- ii. UTRADE MY 3
- iii. UTRADE Futures
- iv. UWEALTH

Social Media: UOBKH's official social media accounts and pages.

Offline Channels: Offline interactions, such as in-person events, roadshows, or customer support.

Other Channels: Any other channels through which UOBKH collects personal data.

This Privacy Policy covers all and any personal information collected by UOBKH regardless of the method or technology used to collect it.

Developer Information Where applicable, UOBKH has obtained the legal rights to distribute and customise the UOBKH digital platforms listed above. The underlying intellectual property rights, including but not limited to copyrights, patents, and trademarks, remain the property of the respective platform developer(s). While UOBKH has obtained the rights to distribute and customise each digital platforms, both UOBKH and the respective platform developer(s) are jointly responsible for the collection, use, disclosure, handling, protection, access and control over the personal data contained in these platforms. By using the specified digital platforms, you acknowledge and agree that UOBKH and respective platform developer may collect and process your personal data in accordance with their respective privacy policies.

### 3. Types of Personal Data Collected

#### Personal Data

Generally, we collect personal data from you - any information that is linked to an individual, directly, or indirectly or in connection with other information that allows for the identification or identifiability of a natural person in order to use UOBKH's Services. Some examples of types of data collected includes:

Personal Data e.g. UserID, Name, ID Number, Address, Phone Number; Email Address etc;

App Usage Data e.g. App usage patterns, App interactions, Crash Logs etc;

Device Data e.g. Device model, Device OS, unique device identifiers etc.

This is not an exhaustive list and we may collect other types of personal data from you.

#### Non-Personal Data

Apart from personal data, we may collect other non-personal types of data which is not linked to you and/or which is anonymous, for example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our Services.

#### 4. Purpose for Personal Data Collection, Processing and Disclosure

##### Data Collection

Generally, personal and non-personal data are collected for the following purposes:

- (a) Providing a service and / or a product to you;
- (b) Legal compliance on our part under applicable laws;
- (c) To obtain and/or disclose any Credit Information as defined in the Credit Reporting Agencies (CRA) Act 2010 relating to you from credit bureaus or credit reference agencies, including Experian Information Services (Malaysia) Sdn. Bhd. ("EXPERIAN") or any source deemed appropriate to verify your credit history.

##### Data Processing and Disclosure

We do not process and disclose your personal and sensitive data with third parties, except in the following situations:

- i. There is implied consent that you agree to provide us with personal data in order for us to provide you with the requested access to our Services;
- ii. To comply with legal obligations;
- iii. To protect and defend our rights and property;
- iv. To platform developers to assist in operating, maintaining and supporting respective Services (under strict confidentiality agreements).
- v. To group companies or business partners or data storage facilities of which may include but not limited to Unlisted Capital Market Products Issuers, or third party service providers.
- vi. For business purposes using non-personal, non-individual information in aggregate form, such as sharing with advertisers on our website or informing our business partners about the number of customers in certain demographic groups who purchased specific products or engaged in particular transactions ; and/or
- vii. Circumstances under applicable laws where we are permitted to collect, process and disclose personal data without your consent.

You may obtain more information by contacting us (see Section 15).

## 5. Transfer of Personal Data Overseas

To the extent that we may need to transfer personal data outside of Malaysia, whether to our group companies or business partners or third-party service providers or simply to data storage facilities, we shall do so in accordance with the Personal Data Protection Act, 2010 ("PDPA") to ensure that we provide a standard of protection to personal data so transferred that is comparable to the protection under the PDPA.

## 6. Data Subject Consent

Generally, when we request for personal data in the course of providing you a service and / or product and you provide us with such personal data, there is implied consent that you agree to provide us with personal data in order for us to provide you with the requested service and / or product. In some circumstances and as required by applicable laws, we will seek your express consent when collecting your personal data. For example, where there are new purposes for the use of your personal data, we will seek your fresh consent. In addition, you are able to withdraw your consent at any time by contacting us (see Section 15).

## 7. Personal Data Access

You are entitled to certain access rights to your personal data. We may charge a reasonable administrative fee for this service. In exceptional circumstances, we reserve the right to deny you access to your personal data and may provide an explanation as required by applicable laws.

## 8. Personal Data Correction

You are entitled to certain correction rights to your personal data. In order to ensure that your personal data is current, complete and accurate, please contact us (see Section 15) or reach out to the authorised representative for your account maintained with us.

## 9. Personal Data Deletion and Retention

Retention Personal data will be held for as long as it is necessary to fulfil the purpose for which it was collected as outlined in this Privacy Policy, or as required or permitted by applicable laws. We shall cease to retain personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal data was collected is no longer being served by retention of the personal data and retention is no longer necessary for legal or business purposes.

Deletion If you request the deletion of your personal data, we will comply with your request unless we are legally required to retain the data. We may charge a reasonable administrative fee for this service. Please note that even after we delete your personal data, we may retain certain information in an anonymised or aggregated form for audit or research or statistical purposes. To request for deletion, contact us in writing (see Section 15).

## 10. Personal Data Security

We have put in place security procedures and technical and organisational measures to safeguard your personal data from unauthorised access, alteration, disclosure and destruction including but not limited to firewalls, browser certification technology, data encryption at rest, data encryption in transit, restricted access control to authorised personnel only, use of passwords, regular cyber security audits and monitoring for potential vulnerabilities, training to our employees on data security best practices as appropriate. We will use all reasonable efforts to safeguard your personal data. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the Internet.

## 11. Updates to the Privacy Policy

We keep our Privacy Policy under regular review. If we change our Privacy Policy, we will post the changes on our official websites listed in Section 2 above, so that you may be aware of the information we collect and how we use it. Such changes to our Privacy Policy shall apply from the time that we post the same on the websites. Your continued use of our Services will be taken as acceptance of the updated Privacy Policy, but we will seek your fresh consent before we collect more personal data from you or we wish to use or disclose your personal data for new purposes.

## 12. Cookies

A cookie is an alphanumeric identifier which we transfer to your hard drive through your web browser when you visit our website. It enables our own system to recognise you when you visit our website again and improve our service to you. The information is used to track visitor use of the website and to compile statistical reports on website activity. For further information about cookies visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). Cookies may also be used to compile aggregate information about areas of our website that are visited most frequently. This traffic information can be used to enhance the content of our website and make your use of it easier. If you wish to reject our cookie, you can configure your browser to do so. However, in a few cases some of our website features may not function if you remove cookies from your browser.

## 13. Prevailing Terms

If you have agreed to our General Terms & Conditions or Account Application Form, as the case may be, in the event of inconsistency between such General Terms & Conditions or Account Application Form and this privacy policy, such General Terms & Conditions or Account Application Form shall prevail.

## 14. Governing Law

Note that as we are a registered company in Malaysia, this Privacy Policy has been drafted solely in accordance with the laws of Malaysia. We do not represent or warrant that this Privacy Policy complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Policy as such.

## 15. Contact Us

If you have any questions about this Privacy Policy, or would like to exercise any of your rights, please contact us in writing at the address below marked with 'Privacy Policy':

Address:

Head of Compliance  
UOB Kay Hian Securities (M) Sdn Bhd,  
Ground Floor, Menara Keck Seng  
203 Jalan Bukit Bintang  
55100 Kuala Lumpur, Malaysia

## 16. Disclaimer

Our website may contain links to other websites. Please note that we are not responsible for the privacy practices of such other websites and advise you to read the privacy statements of each website you visit which collects personal data.