

Liquid Account Privacy Policy

This Privacy Policy (this “Policy”) as may be amended, modified or supplemented from time to time, applies to all visitors accessing and/or using the Liquid App, Liquid website and/or our Services (collectively referred to as “Liquid Services”) (such persons collectively referred to as “you”) and is meant to help you understand how Liquid Group Pte. Ltd. and its related corporations (“Liquid” or “we” or “us”) collect, use, disclose, transfer and store your personal information which is subject to the Singapore Personal Data Protection Act 2012 (“PDPA”). Please take time to read this Policy carefully. Where applicable, including where required under foreign data protection laws such as the EU General Data Protection Regulation (“GDPR”), Liquid will comply with the relevant requirements to the extent applicable. All capitalised terms used in this Policy shall have the same meaning as those ascribed in the [Terms of Use](#) unless otherwise stated or defined herein.

By signing-up as a registered User, interacting with us, accessing or using the Liquid Services, you are acknowledging and agreeing to the collection, use and disclosure of your Personal Data in accordance with this Policy, and where required under applicable law, providing your consent. If you do not agree with this Policy or do not consent, please do not use or access the Liquid Services.

It is your ongoing obligation to ensure that all Personal Data submitted and communicated to us is complete, accurate, true and correct at all times. Failure on your part to do so may result in our inability to provide you with the Liquid Services you have requested.

Collection, Use and Disclosure of Personal Data

1.1 “Personal Data” in this Policy refers to any data, whether true or not, about an individual who can be identified - (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including those which may be in our records and updated from time to time.

1.2 By way of example the manner in which we may collect your Personal Data includes (but is not limited to) the following:

Information you provide to us: We may collect, store and further process information you disclose to us when you sign up on the Liquid App and/or Changi Pay as a User and/or access and/or use (whether as a User or otherwise) the Liquid Services. We may collect your personal information, including but not limited to, your first name, last name, full name, nationality, national identification number, identity document expiry date, email address, mobile number, residential status, residential address, biometric data (i.e. data relating to the physiological, biological or behavioural characteristics of an individual, such as, facial images and fingerprints), gender and date of birth at the point of signing up or registration, information which you authorize Changi Airport Group (Singapore) Pte. Ltd. and its affiliates to disclose to Liquid, depending on the nature of the Services and your interaction with us. Once you have successfully registered with us as a User, you may not be anonymous to us. We may also collect and store information when you interact with us including, but not limited to, instances when you add or update your User Account details via the Liquid App, when you upload an image of yourself under your User Account details, when

you participate in activities on the Liquid Services, when you add your scheme card or bank account details to your User Account, or when you correspond with us regarding the Liquid Services. If you provide Personal Data of a third party (e.g. information of your dependent, spouse, parents, employees, business partner) to us, you represent and warrant that you have obtained the lawful consent of such third party for the collection, use and disclosure of their Personal Data to us.

Information we collect automatically: When you use Liquid Services, we may collect information sent to us by your computer, mobile phone or another access device. Such information includes, but is not limited to, details of your page visits or mobile application usage, your computer or mobile devices' configuration such as (but not limited to) your device ID, IP address, location, your transactions executed within the Liquid App, screens viewed within the Liquid App, cookie information and the pages you requested.

Locational information: When accessing and/or using the Liquid Services, we may collect and store your locational information if permission has been explicitly granted under the Liquid Services by you, in order to verify or authenticate transactions as well as to improve your user experience through localized content. Liquid Services may use technologies available through the devices including but not limited to GPS, WiFi, IP address and cell towers to generate your location, unless you configure your operating system settings to prevent our collection of locational information.

Other information: By taking up any Services (including but not limited to downloading any electronic pre-paid cards, wallets, membership cards or discount cards issued by any Third Party Service Providers on your Liquid App) or participating in any promotions or surveys or by completing certain tasks or actions on the Liquid App and/or Liquid website, you consent to sharing such Personal Data you provide with us and the relevant Third Party Service Providers. We may share this Personal Data with our Third Party Service Providers and we may use such Personal Data to match offers or provide discounts and services to your profile. The Personal Data (including biometric data) shared with our Third Party Service Providers may be used at such Third Party Service Providers' discretion and in accordance with such Third Party Service Providers' privacy policies. We advise that you check and familiarize yourself with any relevant terms before you submit any Personal Data to these third parties. Where you provide Personal Data directly to third parties, their processing will be governed by their own privacy policies. Liquid is not responsible for the privacy practices of such third parties. We will share your Personal Data, including personal information, locational information, friends list(s), and moments with certain social networking or other third party applications or services, if you choose to connect these to your User Account. Subject to compliance with privacy laws from time to time and without prejudice to the above, we may also use any information we obtain about your activity on the Liquid App or in connection with our Services, on an anonymised basis.

Our Services are not intended for individuals under the age of 18 (or such other age of majority as may apply under local law), and we do not knowingly collect Personal Data from minors without appropriate consent.

Use of Personal Data:

Where required under applicable data protection laws, we process Personal Data on one or more of the following lawful bases:

- (i) performance of a contract with you;
- (ii) compliance with legal or regulatory obligations (including AML/CFT obligations);
- (iii) our legitimate interests (including fraud prevention, system security, and service improvement); and/or
- (iv) your consent, where required by law.

We may collect, use, process and/or disclose Personal Data including biometric data for the following purposes to the extent applicable (among others):-

- to help us further create, develop, operate, deliver, and improve the Liquid App, Liquid Website and/or New Services;
- to administer, manage and operate the Liquid App platform, to provide the Services through the Liquid App and/or Liquid website and such other channels as may be available from time to time, and to provide customer service to you;
- to conduct marketing efforts including websites, events, promotions and to offer discounts and other privileges to you;
- to help us to verify your identity in order to process and administer your account registration or use of Liquid Services;
- to protect our systems and customers, ensure the integrity and operation of our businesses and systems and for loss prevention and anti-fraud purposes;
- to send important notices, such as communications about purchases and changes to our terms, conditions, and policies;
- to offer you tailored content, such as giving you updates on special offers and reward schemes;
- for internal purposes such as auditing, data analysis, and research to improve the Liquid App and/or Liquid website and customer communications;
- where collected from cookies and other technologies, like pixel tags, to improve your user experience and the quality and scope of our services;
- to comply with applicable laws, regulations and other requirements (e.g. providing assistance to law enforcement agencies, regulatory authorities and other governmental agencies, cooperating with governmental requests, performing internal audits);
- to conduct anti-money laundering (AML) / countering financing of terrorism (CFT) checks;
- to collect and use biometric data solely for identity verification, authentication and fraud prevention purposes. Biometric data is protected using enhanced security safeguards and is not used for profiling or automated decision-making beyond authentication;
- to use automated systems to detect suspicious activity, fraud or regulatory risk. Where required under applicable law, you may request human review of decisions that significantly affect you;
- to conduct identity verification, onboarding checks, sanctions screening, transaction monitoring, and ongoing compliance reviews through third-party service providers, financial institutions, credit reference agencies, fraud prevention agencies, blockchain analytics providers and other compliance vendors;

- to monitor account activity, transaction patterns and behavioural indicators for fraud detection, sanctions compliance, financial crime prevention, risk assessment and regulatory reporting purposes;
- for crime prevention, detection and investigation, and to report any activity that we suspect violates any law or regulation to appropriate law enforcement agencies, regulatory authorities and other governmental agencies;
- to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against any legal claims;
- to comply with any sanctions or law enforcement requirements, to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of the Terms of Use, the terms of any Third Party Service Provider, any terms relating to any particular offer, promotion or task, or as otherwise required by law; and/or
- purposes which are reasonably related to the aforesaid.

Your Personal Data may be transferred to, processed or stored in jurisdictions outside Singapore or the jurisdiction in which it was collected, including in connection with cross-border payment services. Where required under applicable law, we implement appropriate safeguards for such transfers, which may include contractual safeguards (such as Standard Contractual Clauses approved by the European Commission), internal data protection policies, or other legally recognised transfer mechanisms.

Your Personal Data held by us shall be kept confidential. However, in order to carry out the purposes listed above, we may share your Personal Data with Third Party Service Providers or other third parties whether in Singapore or elsewhere. When doing so, we will require them to ensure that your Personal Data disclosed to them are kept confidential and secure. In connection with the foregoing, some of these third parties, such as analytics providers, may collect information about your online activities over time and across different websites or online services when you use our Services. We require our third-party service providers to implement appropriate data protection measures; however, where you provide Personal Data directly to third parties, their processing will be governed by their own privacy policies.

Accessing and updating your Personal Data: When updating your Personal Data (including biometric data) with us, we may ask you to verify your identity before we act on your request. To the extent permitted by law, we may reject requests that are unreasonably repetitive, require disproportionate technical effort, risk the privacy of others, or would be extremely impractical. Whilst we do not impose any fees or charges to provide information access and/or make any corrections, we reserve the right to do so where it would require a disproportionate amount of effort on our part. In the event that you choose to close your User Account with us, we may still continue to retain your Personal Data in our databases after your User Account has been closed, for legitimate business or legal purposes. Subject to applicable law, you may have additional rights including the right to request erasure, restriction of processing, data portability, or to object to certain types of processing. Where processing is based on consent, you may withdraw consent at any time, subject to legal or contractual restrictions. We will respond to such requests within the timeframes prescribed under applicable law.

Merchants and Third Party Service Providers

We work with Merchants, banks, non-bank financial institutions, schemes or other Third Party Service Providers to enable them to accept payments from you using Liquid Services. In doing so and in order for us to process your payments via the Liquid App, we may share Personal Data about you with such party, such as your name, contact information, any image or profile picture you upload onto the Liquid App, date of sign-up, the details of your payment transaction and number of payments you have made. We may also use this information to confirm to that party that you are a User.

We may also share your Personal Data with payment schemes, digital wallet operators, correspondent banks, settlement banks, remittance partners, blockchain network providers, card networks, QR network partners and other financial service providers where necessary to provide, process, settle, facilitate, reconcile or investigate transactions.

In connection with cross-border payment services, your Personal Data may be shared with overseas banks, payment schemes, financial institutions, network partners and regulatory authorities as necessary to process, settle or investigate transactions.

We may also work with Merchants, banks, non-bank financial institutions, schemes or other Third Party Service Providers to enable them to offer their own electronic pre-paid cards, wallets, membership cards or discount cards on our Liquid App. In doing so, we may share information about you with such party, such as your name, mobile phone number, gender, date of birth or Liquid App username and any other information that you may disclose to us when you choose to register for and use their electronic pre-paid cards, wallets, membership cards or discount cards on our Liquid App.

We do not disclose your full scheme card number or bank account number to anyone you have paid using our Liquid App, except with your express permission or where required by law (e.g. pursuant to a court order or legal process). We do not store full scheme card numbers or card security codes (e.g. CVV). Where you add a scheme card, your card details are tokenised once successfully verified and accepted by the Liquid App, and we may retain the token and limited information (such as card type/issuer and last few digits) for transaction processing and account management.

Information Sharing and Disclosure

Depending on the nature of the Service and transaction, Liquid may act as a data controller, joint controller or data processor in relation to your Personal Data. Where we act as a data processor on behalf of another regulated financial institution or partner, your Personal Data will be processed in accordance with the instructions of that party and the applicable contractual arrangements.

We do not distribute your Personal Data to any third party unaffiliated with Liquid or who is not a Merchant or other Third Party Service Provider, except when we have your permission to do so.

In the event of a potential, proposed or actual sale or disposal of business or interest, merger, acquisition, reorganisation or funding exercise relating to Liquid (including negotiations thereof) or any other situation where Personal Data may be disclosed or transferred as one of our business

assets, we will notify you before Personal Data about you is transferred and becomes subject to a different privacy policy.

You agree that by opting to participate in any promotions, activities or surveys relating to Liquid App from time to time, you consent to Liquid sharing all information (including any personally identifiable information) that we collect from you with the relevant Merchant or Third Party Service Providers in connection with the relevant activity, survey or promotion.

Where the provision of a Service necessarily involves the sharing of Personal Data with a partner financial institution, scheme or network, such sharing is a necessary part of providing the Service and is deemed authorised by your continued use of the Service.

We may disclose Personal Data to regulatory authorities, central banks, payment regulators, law enforcement agencies, tax authorities and governmental bodies in Singapore or overseas where required to comply with legal, regulatory, reporting or supervisory obligations.

Cookies

A cookie is a small amount of data generated by a website and saved by your browser which may then store it on your system. We may set and access cookies on your computer or mobile device. Our cookies and similar technologies generally do not store information that directly identifies you (such as your name or NRIC). However, they may collect or use device identifiers and usage information to help recognise your session, improve functionality and enhance your user experience. We use cookies and similar technologies to recognise you as a User and to support functionality and user experience. Should you wish to disable the cookies associated with these technologies, you may do so by changing the settings on your browser. However, by doing so, you may not be able to use certain functions or enter certain part(s) of our websites.

Account Information

We reserve the right to send you certain communications relating to our Services, such as service announcements, administrative messages and service notifications that are considered part of your account with Liquid, without offering you the opportunity to opt-out of receiving them.

You may close your User Account at any time by e-mailing us with your request and supporting details at Support@liquidgroup.sg. You will not be able to recover, reverse, cancel or ask for any refund of any transaction that is in process once your User Account has been closed. To the extent permitted by law, we reserve the right to use any Personal Data that may have been collected during your visits to www.liquidgroup.sg or through your use of the Liquid App even after your account has been permanently closed for aggregated reporting and analysis purposes, or for such other purposes as may be permitted by you or by law.

Data Storage and Retention Limitation

We implement technical and organisational measures designed to ensure data minimisation, access control, encryption, logging and secure transmission of Personal Data in accordance with industry standards applicable to regulated payment institutions.

We may store and process your Personal Data using third party servers located in secure data centres in Singapore or elsewhere or in the cloud. We retain Personal Data for as long as necessary to fulfil the purpose for which it was collected, including to comply with regulatory retention obligations (such as AML/CFT record-keeping requirements), resolve disputes, and enforce our agreements, even after account closure where required by law. This Personal Data is protected by physical, electronic and procedural safeguards in compliance with applicable regulations. We also use computer safeguards such as firewalls and data encryption. We authorize access to Personal Data only for those employees who require it to fulfil their job responsibilities.

We make reasonable efforts to ensure security on our systems. Despite our efforts, we cannot guarantee that Personal Data may not be accessed, disclosed, altered or destroyed by breach of our administrative, managerial and technical safeguards. Therefore, we urge you to take adequate precautions to protect your Personal Data as well, including never sharing your User Account password with anyone and ensuring that access to your mobile device is password/pin/biometrics-protected.

Changes to this Policy

We reserve the right to revise, supplement or update this Policy from time to time by posting the revised version on the Liquid App and/or Liquid website or such other method of notification as may be prescribed by Liquid to ensure that it is consistent with any industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Policy as updated from time to time on our website www.liquidgroup.sg or the Liquid App.

Questions

If you have questions or suggestions about the collection, use and/or disclosure of your Personal Data or this Policy or would like to receive information about the Personal Data we have in relation to you, to update such Personal Data or to withdraw any consent you have provided to us previously, please contact our Data Protection Officer at support@liquidgroup.sg.