

Privacy Policy

1. Introduction

AFS Global Ltd (hereinafter referred to as 'AFS', 'the Company', 'we', 'our', 'us' as appropriate) is authorized and regulated by the Labuan Financial Services Authority (LFSA) and has a License number MB/18/0025 to carry on Labuan money broking business, and License number FML/21/0060A to carry on business as a Labuan fund manager issued under the Labuan Financial Services and Securities Act 2010 of Malaysia to carry out Money Broking and other permitted services.

This policy sets out the different areas where user privacy is concerned and outlines the obligations & requirements of the users, the website and website owners. Furthermore, the way this website processes, stores and protects user data and information will also be detailed within this policy.

This policy also applies to personal information processed in connection with digital features, connected applications, MCP/API Access and account-linked tools made available by the Company from time to time. This may include features through which a Client may authorise an External Application to access Client Account information or submit requests, Instructions or Orders through a technical interface.

2. The Website

By accessing our websites, we consider that you have read and understood the terms of this policy and how we process any information you disclose to us including personal data prior to becoming a client, during our business relationship and after its termination.

3. Use of Cookies

What are cookies

Cookies are small files saved by the browser to the user's computer's hard drive that track, save and store information about the user's interactions and usage of the website. This allows the website, through its server to provide the users with a tailored experience within this website.

What do we use cookies for?

We may use cookies to remember personal settings you have chosen at our website. In no other context do we use cookies to collect information that identifies you personally. Most of the cookies we set are automatically deleted from your computer when you leave our website or shortly afterwards.

We use anonymous session cookies (short-term cookies that disappear when you close your browser) to help you navigate the website and make the most of the features. If you log into the website, application or a course as a registered user, your session cookie will also contain your user ID so that we can check which services you are allowed to access.

This website uses tracking software to monitor its visitors to better understand how they use it. This software is provided by Google Analytics which uses cookies to track visitor usage. The software will save a cookie to your computer's hard drive in order to track and monitor your engagement and usage of the website, but will not store, save or collect personal information.

Should users wish to deny the use and saving of cookies from this website onto their computer's hard drive, they should take necessary steps within their web browser's security settings to block all cookies from this website and its external serving vendors.

4. Personal Information

When using our website, software applications, or services, you may be required to provide personal information, including but not limited to your name, residential or business address, email address, account credentials, telephone number, professional or employment details, identification numbers, financial profile information, tax-related data, banking details, and, where applicable, sensitive data such as information obtained through compliance and due-diligence screenings (including databases such as ID Wise and World-Check).

We process this information for the purposes of administering and operating our website, applications, client records, and marketing communications. All personal information is stored and processed securely.

Where you use MCP/API Access or another connected application made available by the Company, the personal information processed may include account identifiers, Client Account information, balances, positions, order and transaction history, access permissions, connection and revocation records, technical connection data, API requests, Instructions, Orders, execution records and related activity logs. The Company does not necessarily receive or retain the content of conversations, prompts, reasoning, strategies or other information within an External Application unless that information is transmitted to the Company through MCP/API Access.

By providing your telephone number, postal address, or email address, you expressly consent to being contacted by the Company through the communication channels you have supplied, in connection with our services, contractual relationship, or related communications.

Where the lawful basis for processing does not otherwise arise under contractual performance, legal obligation or legitimate interests, the Company will request your consent before enabling the relevant feature or processing the relevant data.

5. Information collection and use

We collect your information based on the below:

a. Contractual Performance where processing i.e. necessary for the performance of a contract with the data subject
b. Compliance with legal obligations
c. Legitimate Interest where we have a legitimate and genuine reason to process your personal information

How do we collect information?

AFS collects information in two possible ways:

a. When you directly give it to us ("Directly Provided Data")

When you sign up for our site, purchase our products or communicate with us, you may choose to voluntarily give us certain information – for example, by filling in text boxes or completing registration forms. All this information requires direct action by you at that time in order for us to receive it.

Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for our internal analytics purposes, to improve the quality and relevance of our website to our visitors.

b. **Types of information that you provide to us directly:**

- Identity Data which includes your name, date of birth, gender and Information that enables us to check and verify your identity;
- Employment data which includes your employment status, position and name of employer;
- Contact Data which includes your residential address, email address and telephone number;
- Financial Data which includes banking details, transactions details and financial profile details; and
- Marketing Data which includes your personal interests and preferences in receiving marketing from us.
- Account access and usage data which includes log-in records, connected application status, authentication events, consents, and records of permissions granted by you for account-linked features;
- Trading interaction data which includes prompts, account queries, requests, Instructions, Order details, confirmation responses, and records of actions initiated through a connected conversational interface; and
- Technical data relating to connected features, which may include device, browser, session, IP address, error and audit log information where required for service provision, security, compliance and incident investigation.

c. It is also personal data resulting from observation of your activities:

- Communications between you and the company via Live Chat, email, or telephone call;
- History of website usage or search activities, details of your visits to our website;
- traffic and location data;
- website traffic pattern information, including IP addresses, operating system and browser type, for system administration and to report aggregate information to our advertisers. This information is only used in masked or aggregated form, which means that the individual user is not identifiable; and
- Complaint data: for example, what the complaint was, how we investigated it and how we resolved it, including any contact with third party adjudicator services.

d. When you give us permission to obtain from other accounts ("User Authorised Data"):

Depending on your settings or the privacy policies for other online services, you may give us permission to obtain information from your account with those other services, or to make certain information available through a connected service or interface approved by the Company. For example, this may include a third-party interface through which you access Company account information or submit

account-related prompts, requests, Instructions or Orders or when you send us your location when accessing our website from your smartphone.

We use the information received through such services only for the purposes of providing the relevant feature, operating and securing our Services, maintaining records, complying with legal and regulatory obligations, investigating incidents, and improving the quality, security and reliability of our systems and service delivery.

We will have the legitimate interest in contacting you by email, SMS, post or phone to ensure that you are aware of all the services available to you, or for other marketing purposes. However, you can opt out from these communications at any time, for more details refer to Section 13 "Promotional and Newsletter Communication".

Where our use of your personal information does not fall under one of these lawful bases, we require your consent. Such consent shall be freely given by you, and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice.

6. Who may we disclose personal information to

We may disclose your personal information to the following categories of recipients:

a. to our group companies, third party service providers and partners who provide data processing, hosting, cloud, authentication, communications, security, record-keeping, analytics, support or other technology services to us, or who otherwise process personal information for purposes described in this Privacy Policy or notified to you when we collect your personal information.

   For certain connected features, this may include service providers who host, support or enable third-party interfaces through which account-related prompts, account data, requests, summaries, confirmations, Instructions or Orders are processed or transmitted. The Company will take steps required by applicable law to ensure that such disclosures are limited to what is necessary and are subject to appropriate contractual, technical and organisational safeguards.

   In relation to MCP/API Access, the Company may disclose personal information to third-party providers that host, support, or enable the relevant conversational interface and related technology services. The identity of such providers, the categories of personal information processed, and further details regarding such processing will already be known to the Client, as the Client independently selected the relevant third-party provider and has previously provided, or otherwise made available, the necessary personal and other data to that provider prior to activating or using the MCP/API Access.

b. to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary:

   I. As a matter of applicable law or regulation,

II. To exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

c. to any other person with your consent to the disclosure.

7. Data Retention

AFS will not retain your personal information longer than necessary. We will hold onto the information you provide either while your account is in existence, or as needed to be able to provide the Services to you, or (in the case of any contact you may have with our Customer Services team) for as long as is necessary to provide support-related reporting and trend analysis only.

If legally required or if it is reasonably necessary to meet regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our Terms and Conditions, we may also retain some of your information for a limited period of time as required, even after you have closed your account or it is no longer needed to provide the Services to you.

Where you use MCP/API Access, the Company may retain authorisations, connection and revocation events, access permissions, relevant application identifiers, API requests, Instructions, Orders, transaction records, time stamps, execution records and related audit logs for the period necessary to provide the relevant Services and for any applicable legal, regulatory, audit, complaint-handling, fraud-prevention, security and dispute-resolution retention period. The Company does not necessarily receive or retain the content of conversations, prompts, reasoning, strategies or other information within an External Application unless that information is transmitted to the Company through MCP/API Access. Where different retention periods apply, the Company will retain the relevant information for the longer applicable period.

8. Your Rights

You may request access to the personal information which the Company holds about you. You may also request that the Company correct personal information which is inaccurate, incomplete, misleading or not up to date.

You may withdraw any consent which you have given to the processing of your personal information. You may also request that the Company stop processing your personal information for direct marketing purposes, or where permitted by applicable law.

The Company will consider any request to delete, restrict or stop processing your personal information in accordance with applicable law. Please note that the Company may be required, or may be entitled, to retain certain personal information where this is necessary to provide the Services, comply with legal or regulatory requirements, maintain trading and communications records, prevent fraud or misuse, protect the security of its systems, investigate complaints, resolve disputes, or establish, exercise or defend legal claims.

If you wish to make a request in relation to your personal information, please contact us at mysupport@amanacapital.com.

9. How we keep your personal information secure

We use appropriate technical and organisational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information. In particular, we:

a. Hold personal information in secure facilities and where the information is held electronically, on secure servers.

b. Use encrypted transmission links whenever we can.

c. Use other safeguards such as firewalls, authentication systems (e.g., passwords), and access control mechanisms to control unauthorized access to systems and data.

d. Regularly review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems.

e. Restrict access to personal information to our employees, contractors and agents who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. AFS may discipline or terminate individuals who maliciously acquire information, without being entitled to its access.

f. In relation to connected applications and conversational features, we may also apply additional safeguards such as access controls, authentication checks, encrypted transmission, activity logging, permission management, environment restrictions and monitoring measures designed to reduce the risk of unauthorized access, misuse, loss of data or unauthorized account activity.

10. International data transfers

Subject to applicable law, the Company may transfer or permit access to your personal information outside Malaysia, including where this is necessary to provide MCP/API Access, operate the Company's systems, use cloud or technology service providers, maintain records or comply with legal and regulatory requirements. Where required, the Company will take reasonable steps to ensure that the recipient provides a level of protection for personal information which is comparable to that required under applicable law, including through contractual, technical or organisational safeguards.

11. MCP/API Access and External Applications

Where you choose to activate or use MCP/API Access, the Company may process personal information relating to your use of that service. This may include account identifiers, Client Account information, balances, positions, Orders, transaction history, access permissions, connection and revocation records, technical connection information, API requests, Instructions, execution records and activity logs.

MCP/API Access may permit the Company to transmit Client Account information, pricing information, Instructions, Orders and related technical information to an External Application at your direction. The Company does not operate, control or supervise an External Application and is not responsible for the manner

in which an External Application processes, stores, uses, secures, transmits or deletes information after it has been transmitted to that External Application.
The Company does not necessarily receive or retain the content of conversations, prompts, reasoning, strategies or other information within an External Application unless that information is transmitted to the Company through MCP/API Access.

You should not provide passwords, payment-card information, bank-account information, identity documents, one-time passcodes or other highly sensitive information to an External Application unless the Company specifically requests this through a secure and authorised process.

12. Application forms

AFS will not sell your personally identifiable information, gathered as a result of filling out our account application form, to anyone.

Choosing how we use your data:
We understand that you trust us with your personal information, and we are committed to ensuring you can manage the privacy and security of your personal information yourself.

With respect to the information relating to you that ends up in our possession, and recognizing that it is your choice to provide us with your personally identifiable information, we commit to giving you the ability to do all the following:

- You can verify the details you have submitted to AFS by contacting our Customer Services team at mysupport@amanacapital.com
- Our security procedures mean that we may request proof of identity before we reveal information, including your e-mail address and possibly your address.
- You can also contact us by the same method to object to the use of your personal data where such use is based on our legitimate interests or on public interests, change, correct, or delete your personal information, and in certain circumstance restrict the processing of your personal information controlled by AFS at any time. Please note though that, if you have shared any information with others through social media channels, that information may remain visible, even if your account is deleted.
- You can always feel free to update us on your details at any point by contacting us at mysupport@amanacapital.com
- You can request a readable copy of the personal data we hold on to you at any time. To do this, please contact us at mysupport@amanacapital.com

13. Promotional and newsletter communication

If you prefer not to receive promotional information from us or other AFS affiliates, please let us know by using one of the following methods:

- Call us at +60 875 04553, or
- Email us at mysupport@amanacapital.com. Please be sure to include your full name and the e-mail address you used when you registered with or made a purchase from us. It may take up to 2 weeks to process your postal mail request, during which period you may continue to receive communication

from AFS or other affiliates. You may also unsubscribe from AFS Email services by following the opt-out instructions situated at the bottom of any promotional message you receive from AFS.

If you opt out, we may still send you non-promotional communications, such as security alerts and notices related to your access or use of AFS services or those about your online account or our ongoing business relations.

14. Changes to this privacy policy

We reserve the right to update this privacy policy at any time, and we will provide you with a new privacy policy when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.