

Privacy Policy

This privacy policy refers to personal and business information that we may collect from our registered clients and website visitors who use our services by accessing our websites, service platforms, and communicating with us over the phone as well as in writing. The purpose of such privacy policy is to provide a summary of the type of information we may collect, how such information is collected and used, as well as to assure any information we collect will be used fairly and appropriately.

Please read this privacy policy carefully prior to using our services and register client accounts. Client confidentiality is very important to us, hence please do contact us if you have any other concern regarding such issues.

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1. Type of Information We Collect

- 1.1 Information that you provide by filling in forms on both our website as well as any type of forms in writing, including information provided at the time of registering and request to use our website, subscribing to and using our service, as well as any further information we may ask when we process your application to use our services, when we deliver services to you, and when you report a problem back to us.
- 1.2 Details of transactions executed through our site or other methods, and services that we process for you, which may include payment amounts, details of beneficiaries of whom you are sending payments to, as well as incoming fund and other transaction related information. We retain such information for each of your transactions using our service, and may add it to your account profile for use in relation to future transactions made through our service.
- 1.3 The IP address of your computer and other information about the device you use to access our service, from which you may be identifiable. We retain this information to detect unauthorised transactions.
- 1.4 Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for purposes of providing you with our services or otherwise and the resources that you access.
- 1.5 Information about yourself may include your name, address, phone number and email address, potential and existing client's business name, registration number, business address, copies of ID of directors, director's name, director's date of birth, employment details and information relating to your financial circumstances. In order for us to provide our services to you, you must provide bank account information, and "know your customer" information, password information, and responses to security questions. In addition to the "know your customer" information you provide when you apply for an account with Sunrate, we may ask you for further identification information in the course of providing services to you, in particular, if you send or receive high value payments, or to comply with our anti-money laundering regulations.
- 1.6 If you contact us, we may keep a record of that correspondence. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

2. How Do We Collect Information

- 2.1 Sunrate collects information about you when you access our website, register an account (online or through paper based forms) or when you communicate with us over the phone or in writing.

- 2.2 When you access our websites, we may collect your information such as IP address and cookies, please refer to Part 8 regarding IP address and Cookies.
- 2.3 When you register an account with us, we collect, process and store information including but not limited to the information mentioned in clause 1.5. Once your account is fully set up and you begin to transact with us we will collect, process and store financial and transactional information including but not limited to the information mentioned in clause 1.2.

3. Purpose to Collect Information

- 3.1 One of the main reasons we collect and use your personal and business information is to allow us to process your account and service application, as well as transactions you may book through us and to maintain the accuracy of information on your account. Once you have an account with us we will use your details to contact you and to reply to any queries or requests. We may use your information in the administration of your account, which includes us contacting you in order to update your account details (this assists us with keeping our records as up to date as possible) or in order to notify you of changes or improvements to our products or services that may affect our service to you.
- 3.2 We use your information in order to supply our products and services to you and to meet our contractual obligations to you. Additionally, we may need to notify you of any changes relating to our products and services.
- 3.3 Anti-money laundering is one of Sunrate's top focus, which requires us to undertake due diligence on our customers. This may include the use of electronic verification tools. Where electronic verification is not possible we will require documents including, but not limited to, copies of identification documents and proof of address. We may also need to pass your information on to Governmental departments, regulatory bodies, the police/law enforcement agencies or to a court of law. This would be done, for example, to assist in the prevention of a crime (money laundering/fraud), to meet legal requirements or for other lawful purposes.
- 3.4 We may use your information to keep you up to date concerning our products and services. Client surveys help us to improve our services. We may send you emails inviting you to participate in surveys or asking for feedback on our services. The information may be shared with affiliated third parties in aggregate form only. We may also market our services to you through social media platforms using information you provide to us when you interact on our website or sign up for our services. We may share this information with any members of our group, and third parties. Please contact us if you do not want to receive such adverts.
- 3.5 We may record all our telephone calls for security and training purposes.

4. Sharing of Information

- 4.1 We may disclose your personal information to any member of our group.
- 4.2 We may disclose your personal information to third parties under certain events: a) in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets; b) If Sunrate or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- 4.3. We may share your information with regulators, banks and other third party payment processors:
- 4.3.1 We may need to share your information with regulators or with law enforcement agencies. And/ or under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements; or to protect the rights, property, or safety of Sunrate, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud detection and credit risk reduction.
- 4.3.2 We may need to share your information with third parties in order to process your transactions including, but not limited to, banking counterparties and third party payment processors.
- 4.3.3 Additionally owing to the nature of our business we may need to share your information with people or organisations outside your country of residency such as intermediary or beneficiary banks. We are required to include certain information on the payment which may include your name and address.
- 4.4 We may also use your data, or permit selected third parties to use your data, to provide you with information about products and services which may be of interest to you and we or they may contact you about these by post or telephone. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please contact us.

5. Information Storage

- 5.1 We have physical, electronic and procedural safeguards that protect your information. We store all data electronically. Data is stored on servers located in both mainland China and Hong Kong (depends on the type of service you use) and are protected by actively maintained firewalls. We make use of up-to-date anti-virus software and the servers have restricted physical access. If you provide paper based documentation, we may retain the paper documents in addition to saving copies in an electronic format.

- 5.2 Transmission of data on the internet can never be completely secure. We do not and cannot guarantee security of information collected or transmitted electronically, however, we take reasonable care to safeguard your personal information.
- 5.3 All information that is necessary, such as but not limited to, regulatory related including anti-money laundering and counter-terrorist financing will be stored no less than 6 years according to regulation legislation.

6. Access of Your Information

You may request in writing for details of the information we hold about you, a description of that data, the purposes for which it is being used and any parties with which we share your information to, however we have sole discretion to reject such request with no liability nor obligation. If we provide such information, we may charge you an administration fee.

7. Change to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website, where appropriate, notified to you by e-mail.

8. IP Address and Cookies

- 8.1 We may collect information about your computer, including available IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our Client's browsing actions and patterns, and does not identify any individual. For the same reason, we may obtain information about your general internet usage by using a cookie file which is stored on the hard drive of your computer, or similar technologies for storing or retrieving information such as local shared objects, web beacons or web bugs.
- 8.2 A cookie is a small file of letters and numbers downloaded on to a device when the user accesses certain websites. A cookie will allow a website to recognize a user's device. A cookie will contain the name of internet location from which the cookie has come and the lifetime of the cookie.
- 8.3 We use Session cookies to allow you to carry information across pages of our website and avoid you having to re-enter information. Such cookies are temporary cookies that remain in the cookie file of your browser until you leave the site.
- 8.4 We also use Persistent cookies from time to time to help us recognise you as a unique visitor when you return to our website and to monitor your use of our website; also to allow us to link you to any of our Partners or Affiliates should you come to our website through a paid advert or banner on a website of an affiliate. Persistent cookies may remain in the cookie file of your browser for much longer, though depends on the lifetime of specific cookies.

- 8.5 Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These beacons do not carry any personally identifiable information and are used to track the effectiveness of a particular marketing campaign.

9. Enquiry and Contact

Should you have any other enquiry regarding this privacy policy, please kindly contact us at contact@sunrate.com.

Sunrate Solutions