

PRIVACY POLICY (SUMMARY)

Protecting your privacy and keeping your personal information confidential is very important to us. This Privacy Policy (hereafter "Policy") sets out how COMMO T Co., Ltd. collect and manage your personal and sensitive information, in compliance with the available law and regulation of Cambodia. In this Policy, the terms COMMO T refer to COMMO T Co., Ltd. and its related companies or affiliates.

COMMO T collects personal and/or sensitive information to provide you with the products and services that you ask for, as well as information about products and services offered by COMMO T or third parties. COMMO T may use your personal and/or sensitive information to administer COMMO T products and services, for prudential and risk management purposes and, unless you tell COMMO T otherwise, to provide you with related marketing information. COMMO T also uses the information COMMO T holds to help detect and prevent illegal activity. COMMO T cooperate with police and other enforcement bodies as required by law. COMMO T disclose relevant personal information to external organizations that help COMMO T provide services. These organizations are bound by confidentiality arrangements. They may include overseas organizations.

This Policy will be reviewed from time to time to take account of new laws and technology and any changes to COMMO T operational processes, and any amendments to this Policy will be incorporated in an updated version on this page. Your subsequent use of the website constitutes acceptance of those changes. Any information COMMO T hold will be governed by COMMO T most recent Policy.

By opening an account or by using COMMO T website(s), you give your full consent to the collection and use of personal information by COMMO T as explained in this Policy.

Collection of Personal Information

Personal Information

The personal information COMMO T collect about you generally includes the following:

- **Individual**
 1. Personal Information, including name, sex, date of birth, nationality, ID/passport information, marital status and spouse information.
 2. Contact Information, such as address, mobile and work number, email address, and emergency contact.
 3. Occupation Information
 4. Educational Information
 5. Investment Information, including purpose of investment and investment experiences.
 6. Other information that COMMO T consider necessary for us to function and act.
- **Legal Entity**
 1. Legal Entity information, including name, registration number, address, TIN number, nature of the company, nature of the business, registered capital, CEO information, and shareholders information.
 2. Representative information, including name, sex, date of birth, nationality, position, ID/passport information, address, contact number, email address, and emergency contact.
 3. Investment Information, such as purpose of investment and investment experiences.
 4. Other information that COMMO T consider necessary for us to function and act.

COMMO T is required by law to identify you if you are opening a new account or adding a new signatory to an existing account. The COMMO T requires to sight and record details of certain documents (i.e. photographic and non-photographic documents).

COMMO T may take steps to verify the information COMMO T collect. If you provide COMMO T with incomplete or inaccurate information, COMMO T may not be able to provide you with the products or services that you ask for.

Cookies

Cookies help COMMO T provide you with a better website by enabling COMMO T to monitor the pages that you find useful and tailor COMMO T website to your needs, likes and dislikes by gathering and remembering information about your preferences. COMMO T may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns, and does not identify you or anyone else as an individual. COMMO T may disclose the data COMMO T collects through cookies to our related companies.



Consent

In most cases, COMMO T will obtain your consent to use and disclose your personal information for COMMO T intended purposes either before or at the time that COMMO T collect it. If you do not give COMMO T your consent or withdraw your consent, COMMO T may not be able to provide you with the products or services you ask for. You can withdraw your consent at any time in accordance with the withdrawing consent procedure.

Use of Personal Information

COMMO T will use your information for the purpose of opening and maintaining an account, confirming your identity, managing your profile and trading account and to enable COMMO T to provide you with the products and services that you have requested from COMMO T. Unless you have advised COMMO T to contrary, COMMO T will also communicate with you about relevant information and opportunities relating to existing and new products and services which COMMO T consider suitable for you. COMMO T uses personal information only as required to provide quality service and security to you. This information helps improve services, customize browsing experience and enables COMMO T to inform you of additional products, services or promotions relevant to you and the products and services you required and you consent to COMMO T using this data for such purposes. Whilst COMMO T attempts to ensure that all the information COMMO T holds about you is current, accurate and complete, COMMO T urges you to immediately contact COMMO T if any of your personal details have changed.

Disclosure of Personal Information

COMMO T does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Policy. COMMO T may share information with partners, affiliates and alliances in the event such information is reasonably required by such affiliate in order to outsource functions to or partner with, offer additional similar products and services, to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to COMMO T business or perform associated business activities that meet your needs and which are delivered in a manner that is useful and relevant (only where you have authorized COMMO T to do so) and/or service customer account. All third parties with which COMMO T shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way COMMO T protects the same.

Security of Personal Information

Quality of Personal Information

COMMO T ensure that the personal information COMMO T collect and handle is accurate, up to date, complete and relevant. COMMO T may also take steps to update the personal information COMMO T holds. Please contact COMMO T if any of the details you have provided to COMMO T change or if you believe that the information COMMO T has about you is not accurate or up to date.

Security of Personal Information

COMMO T is committed to protecting the personal information COMMO T holds about you from misuse, unauthorized access and disclosure. COMMO T has implemented a range of practices and policies to provide a robust security environment. COMMO T ensure the on-going adequacy of these measures by regularly reviewing them.

Where COMMO T identify that COMMO T no longer needs certain personal information, COMMO T ensure that it is effectively and securely destroyed. The privacy and confidentiality of your personal information is of fundamental importance to COMMO T. COMMO T take all appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data and personal information.

Restriction of Responsibilities

COMMO T is not responsible for the privacy policies or the content of sites COMMO T links to, and has no control of the use or protection of information provided by clients or collected by those sites. Whenever a client elects to link to a co-branded website or to a linked website, the client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.



Updates of Privacy Policy

COMMO T reserves the right to change or amend this Policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If COMMO T makes material changes to this Policy including how COMMO T collect, process or use your personal information, COMMO T will notify you by email or by means of a notice on COMMO T website. Client agrees to accept posting of a revised Privacy Policy electronically on the website as actual notice to client. Any dispute over COMMO T's Privacy Policy is subject to this Notice and COMMO T Customer Agreement. COMMO T encourages clients to periodically check back and review this Policy so that clients will always know what information COMMO T collects, how COMMO T uses it, and to whom COMMO T may disclose it. The latest and prevailing version of this Policy will be at all times available at commot.asia.

Legal Disclaimers

COMMO T reserves the right to disclose your personally identifiable information as required by law, regulatory, law enforcement or other government authority of a competent jurisdiction and when the COMMO T believes that disclosure is necessary to protect COMMO T rights and/or to comply with a judicial proceeding, court order, or legal process served. The COMMO T will not be liable for misuse or loss of personal information resulting from cookies on the COMMO T website(s) that the COMMO T does not have access to or control over. COMMO T will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious.

Agreement

I have read, understood and agreed with the terms of this Policy, and I confirm that I have full power and authority to be bound by the terms of this Policy.

For further information on the Privacy Policy, please refer to the full Privacy Policy document or reach out to us by info@commot.asia.

