

PRIVACY POLICY

Introduction

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

Personal information is any information or opinion about you that is capable (or reasonably capable) of identifying you, whether the information or opinion is true or not, and regardless of whether the information is recorded in a material form. Moreover, your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade associations or trade union, sexual orientation or criminal record, as well as your health, genetic and biometric information and biometric templates are personal and sensitive information.

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

- Individual
 - Full Name
 - Former Name (if any)
 - Sex
 - Date of Birth
 - Nationality
 - ID Card/Passport Number
 - ID Card/Passport Issuer
 - ID Card/Passport Expiration Date
 - Current Address
 - Permanent Address
 - Contact Number
 - Email Address
 - Occupation Information
 - Marital Status
 - Spouse Information
 - Educational Information
 - Purpose of the Investment
 - Investment Experiences
 - Income Information
 - Source of Wealth
 - Beneficiary Information
 - Bank account and card detail information
 - Emergency Contact
 - Credit or Bankruptcy Check
 - Other information that COMMO T consider necessary for us to function and act.
- Legal Entity
 - Legal Entity Name
 - Registration Number
 - Registration Expiration Date
 - TIN Number
 - Nature of the Company
 - Nature of the Business
 - Company Address
 - Representative’s Name
 - Representative’s Sex
 - Representative’s Date of Birth
 - Representative’s Nationality
 - Representative’s ID Card/Passport Number



- Representative's ID Card/Passport Expiration Date
- Representative's Marital Status
- Representative's Position
- Representative's Current Address
- Representative's Contact Number
- Representative's Email Address
- Registered Capital
- Main Company Income
- CEO Information
- Controlling Person Information
- Shareholders' Information
- Profit Information
- Source of Wealth
- Bank account and card detail information
- Credit or Bankruptcy Check
- Purpose of the Investment
- Investment Experiences
- Emergency Contact
- 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).

Where necessary, COMMO T also collect information on the following individuals:

- trustees;
- partners;
- company directors and officers;
- officers of co-operatives and associations;
- client's agents;
- beneficial owners of the client; and
- persons dealing with COMMO T on a "one-of" basis.

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.

COMMO T only collects personal information when it is reasonably necessary for COMMO T to be able to offer its range of financial products and services to its clients. COMMO T use your personal information to:

- verify your identity;
- provide you with the products and services that you have asked for;
- help COMMO T monitor, evaluate and develop COMMO T products and services;
- enable secure access to COMMO T client area;
- unless you tell COMMO T otherwise, keep you informed about COMMO T products and services and those of COMMO T relevant business and initiative partners, and tailor this information to your needs and interest;
- respond to any feedback, queries or complaints;
- provide you with technical support;
- participate in any third-party acquisition or potential acquisition of an interest in COMMO T or COMMO T assets;
- comply with COMMO T legal obligations under the applicable laws; and
- take measures to detect and prevent fraud, crime or other activity which may cause harm to COMMO T business or COMMO T products and services.

COMMO T may either collect personal information about you directly from you or from sources other than you when permitted. Sources other than you may include your agents, family members, friends, related entities, affiliates or divisions. COMMO T may also collect information from you electronically, for instance, when you visit our website. Periodically, COMMO T may ask you to voluntarily provide COMMO T with information for COMMO T marketing or survey purposes.

Cookies

A cookie is a small data file that asks permission to be stored on your computer, for the purpose of making it easier for you to navigate the website by, for example remembering your viewing preferences, allowing you to visit member-only areas of the website without logging in again. If your computer settings allow cookies, then the file is added and the cookie helps analyze web traffic or lets the site owner know when you visit a particular site. You can set your web browser to inform you when cookies are enabled, or to disable cookies. If you do not wish to receive cookies, most web browsers will permit you to decline/disable cookies and in most cases will still allow you complete access to your websites.

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.



Most web browsers allow you to adjust settings to erase cookies, disallow cookies, or receive a warning before a cookie is set. Please note that some parts of our websites may not function fully if you disallow cookies.

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.

Anonymity and Pseudonymity

In certain situations, COMMO T may be able to give you the option of using a pseudonym or remain anonymous COMMO T when you deal with us. COMMO T are only able to provide you with this option when it is practical for COMMO T to do so, and if COMMO T are not required by law to identify you.

Dealing with Unsolicited Personal Information

If COMMO T receive personal information about you that COMMO T have not ask for, COMMO T will only retain it if COMMO T determine that:

- the information received is reasonably necessary for COMMO T to do business with you; and
- you have either consented to the information being collected, or it was not practical or reasonable for COMMO T to obtain your consent in the circumstances.

If these conditions are not met, COMMO T will destroy or de-identify the information. If the unsolicited information COMMO T receives about you is sensitive information, COMMO T will get your consent to retain it, regardless of what the circumstances are.

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. Although you are not required to provide COMMO T any of the personal information that we may request, please note that failure to do so could result in COMMO T not being able to open your account or provide you with the service you require. 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 has 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. COMMO T will not share personal information with third parties which it considers will not afford its clients the required level of protection. These entities and third parties include:

- brokers and agents who refer your business to COMMO T;
- COMMO T third party business partners or joint initiative providers;
- auditors COMMO T appoint to ensure the integrity of COMMO T operations;
- any person acting on your behalf, including your financial adviser, solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- your employment referee (to confirm details about you);



- if required or authorized to do so, regulatory bodies and government agencies;
- credit reporting agencies;
- other financial institutions and organizations that you seek credit from them (at their request, so that they may assess whether to offer you credit); and
- other organizations who assist COMMO T to provide products and services by performing functions such as client contact, banking, payments, data processing, debt recovery, marketing and advertising, data analysis, business intelligence, website and technology services. They may also provide products and services that integrate with or complement COMMO T products and services.

COMMO T takes obligations to protect your information extremely seriously and makes every effort to deal only with parties who share and demonstrate the same attitude. Each of the third parties that COMMO T contract with is carefully selected and is only authorized to use your personal information in a secure way, that is necessary for them to perform their services to COMMO T. COMMO T will also disclose your personal information if COMMO T are required by law or permitted.

Some of COMMO T related companies and third parties that COMMO T share information with may be located outside of Cambodia. COMMO T will only disclose your personal information to an offshore recipient once COMMO T have taken reasonable contractual and practical steps to ensure that:

- the overseas recipient does not breach this Policy; or
- you will be able to act to enforce the protection of a law or binding scheme that has the effect of protecting the information in a way that's at least substantially similar to the way in which the privacy policy protects the information; or
- you have consented to the disclosure after COMMO T expressly tell you that there is no guarantee that the overseas recipient would not breach this Privacy; or
- the disclosure of the information is required or authorized by or under a Cambodian law, regulation or a court/tribunal order; or
- a permitted general situation exists in relation to the disclosure of the information.

Security of Personal Information

Any personal information you provide COMMO T will be treated as confidential and shared only with COMMO T and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. The personal information that you provide in connection with registering yourself as a user of COMMO T is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you and shall not be revealed to anyone else. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. COMMO T encrypts all personal information as it is transferred to COMMO T and thus makes all necessary effort to prevent unauthorized parties from viewing any such 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.

COMMO T security measures include:

- educating COMMO T employees about their obligations when they collect and handle personal information;
- requiring COMMO T employees to use passwords when accessing COMMO T systems;
- encrypting data sent from your computer to COMMO T systems during internet transactions and client access codes transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorized persons and viruses from entering COMMO T systems;
- using dedicated secure networks or encryption when COMMO T transmit electronic data for purposes of outsourcing;
- practicing a clean desk policy for all premises and providing secure storage for physical records; and
- employing physical and electronic security measures such as swipe cards, alarms, cameras and guards (as required) to protect against unauthorized access to buildings.



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. COMMO T restricts access to personal information to employees who need to know specific information in order to operate, develop or improve COMMO T services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

Rights to Access to or Correction of Personal Information

If you have provided COMMO T with personal information, you have the rights to request to access or correct it.

Requests for access or correct limited amounts of personal information, such as checking to see what address or telephone number COMMO T have recorded, can generally be handled over the phone.

COMMO T will respond to your request as soon as COMMO T is able to. In some cases, COMMO T may ask you to pay an administrative fee to cover costs associated with your request. COMMO T will confirm the cost with you and confirm that you want to proceed before auctioning your request.

COMMO T will endeavor to comply with your request within 30 days of hearing from you. To help COMMO T respond, please include as much detail as possible about the information that you want to access or correct and, if relevant, how you would like to access the information.

COMMO T will always confirm your identity before providing you with access to your personal information.

Exceptions and Refusal to Give Access or Correct

In some circumstances, COMMO T might have to deny your request for access or correction, or limit the access COMMO T provide. In either of these situations, COMMO T will let you know the reasons for COMMO T decision in writing. If you disagree with COMMO T decision, you can make a complaint following the process.

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 www.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 and understanding, please reach out to us by info@commot.asia.

