



Nexus Prime

Privacy Policy

Version: 1.0
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PRIVACY POLICY

Purpose

1.1 This is the personal data privacy policy ("Policy") of Nexus Prime ("we", "us", or "our").

1.2 This Policy applies to personal information about individuals (clients/business partners, job applicants, employees) held by us. We will only process your Personal Data in accordance with the Personal Data Protection Act 2010, the applicable regulations, guidelines, orders made under the Personal Data Protection Act 2010 and any statutory amendments or re-enactments made of the Personal Data Protection Act 2010 from time to time (collectively referred to as the "PDPA") as well as this Policy.

1.3 The PDPA requires us to inform you of your rights in respect of your Personal Data that is being processed or that is to be collected and further processed by us and the purposes for the data processing. The PDPA also requires us to obtain your consent to the processing of your Personal Data. In light of the PDPA, we are committed to protecting and safeguarding your Personal Data.

1.4 By providing your Personal Data to us and/or continuing access to our website ("Site"), you declare that you have read and understood this Policy and agree to us processing your Personal Data in accordance with the manner as set out in this Policy.

1.5 We reserve the right to modify, update and/or amend this Policy from time to time with reasonable prior notice to you. We will notify you of any amendments via announcements on the Site or other appropriate means. Please check the Site from time to time to see if there are amendments to this Policy. Any amendments to this Policy will be effective upon notice to you. By continuing to use the services and/or access to the Site after being notified of any amendments to this Policy, you will be treated as having agreed to and accepted those amendments.

1.6 If you do not agree to this Policy or any amendments to this Policy, we may not be able to render all services to you and you may be required to terminate your relevant agreement with us and/or stop accessing or using the Site.

What information do we collect?

We will collect and hold your personal information for the purposes of:

- providing products and services to you;

- managing and administering the products and services
- letting you know about our other products and services.

The type of information collected from you includes information that is necessary to operate your account or for us to provide general advice to you. We may ask you to provide personal information such as your:

- name
- e-mail address
- residential and/or postal address
- date of birth
- telephone number
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN).

This information is collected from application forms you have completed, your use of our online facilities or through ongoing communications with you.

We will not solicit any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Third parties that we may need to collect information from include your financial adviser, product issuer, employer, accountant or solicitor.

We will inform you of any legal requirements for us to ask for information about you and the consequences of not giving us that requested information. For example, in addition to the personal information we will obtain from you, whenever you acquire a new product or service from us, we will require documents evidencing your identity. Such evidence may include a certified copy of your driver's licence, passport or birth certificate.

What if you do not give us the information we request?

You are not obligated to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your application; or
- prevent us from contacting you;

- impact the taxation treatment of your account.

How do we use the information that we collect from you?

We use your personal information for the purpose for which it has been obtained. We collect your personal information so that we are able to act on your request, such as to:

- develop an understanding of the products and services offered by Nexus Prime that might interest you, and;
- send you information about us;
- keep you up to date on other products and services offered by us.

Who do we give your information to?

We may disclose your information to external parties. Where personal information is disclosed, there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organizations to which we may disclose your personal information include:

- our related bodies corporate, agents, employees and representatives, either in BVI or overseas. Any overseas disclosure does not affect our commitment to safeguarding personal information we collect and we will take reasonable steps to ensure overseas recipients comply with the APPs;
- financial institutions and other similar organizations in connection with our corporate activities or that are nominated by you;
- external service providers and professional advisers that provide services to us;
- any organization which you request us to or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant.

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to regulatory and government bodies in Malaysia or pursuant to a court order);
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests);
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation);
- required to assist in law enforcement (such as to a police force).

We may also disclose your information if you give your consent.

What are your rights?

We understand that you may choose not to disclose your personal information to us. If you choose not to provide the information however, we may not be able to open your trading account, or provide you with the product or service you have requested.

Your rights are as follows in respect of the personal information we hold about you:

- The right to be informed about processing of your personal data;
- The right to have your personal data corrected if its inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the “right” to be forgotten”);
- The right to request access to a copy of your personal data and information about how we process it.
- The right to move, copy or transfer your personal data (“data portability”).

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

- You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested.

How do we protect the security of your information?

We have security systems, practices and procedures in place to safeguard your privacy. We may use cloud storage or third party servers to store the personal information we hold about you. These services are subject to regular audit and the people who handle your personal information have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

If you use the secure adviser, member or employer sections of our websites, we will verify your identity by your username and password. Once verified, you will have access to secured content.

Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact our Client Services team.

Cookies

A “cookie” is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our sites. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

Through these cookies we collect statistical information about visitors to our websites, such as the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded. This information is used to evaluate and improve the performance of our websites.

There are two types of cookies on the Nexus Prime website:

- **Behavioural and analytical cookies** help us provide you with a better service. They can tailor site content to your personal preferences and past behaviour, or remember our saved settings. Some of the systems we use to track web traffic and site usage are provided by third-party companies such as Google.
- **Marketing cookies** enable you to experience more relevant online content and see advertisements which are aligned with your interests, as indicated by your activity on our site.

Nexus Prime uses Marketing cookies to provide advertising that is more relevant to you. When browsing through other sites where these cookies are relevant, you will be served advertisements which are in line with your interests based on your activity on the Nexus Prime website.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

How long do we retain your personal information?

We are required by law to retain certain records of information for varying lengths of time and, in certain circumstances, permanently. Where your information is not required to be retained under law, we will take reasonable steps to irrevocably destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.