Gauld Pte. Ltd. — Privacy Policy

This privacy policy will explain how Gauld uses the Personal Data We collect from You when You use Our Platform and Our Website and enter into transactions with Gauld.

Table of Contents

What Data Do We Collect 3

How Do We Collect Your Data 4

How Will We Use Your Data 4

How Do We Store Your Data 5

Use for Marketing 7

What Are Your Data Protection Rights 7

What Are Cookies 8

How Do We Use Cookies 8

What Types of Cookies Do We Use 9

How to Manage Your Cookies 9

Privacy Policies of Other Websites 9

Changes to Our Privacy Policy 10

How to Contact Us 10

How to Lodge a Complaint 10

Legal Basis of Processing

Gauld may process Personal Data relating to Clients if one of the following applies:

- Clients have given their consent for one or more specific purposes.
- Provision of Personal Data is necessary for the performance of a transaction with the Clients and/or for any pre-contractual obligations thereof.
- Processing is necessary for compliance with a legal obligation to which Gauld is subject.
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in Gauld.
- Processing is necessary for the purposes of the legitimate interests pursued by Gauld or by a third party.

In any case, Gauld will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

What Data Do We Collect

Gauld collects, by itself or through third parties, the following Personal Data:

- Personal identification information (full name, email address, postal address, phone number, etc.)
- Usage Data
- Device information
- Geography/region
- Number of sessions
- Session duration
- Operating systems
- Cookies
- Universally unique identifier (UUID)
- Professional situations
- Any other data You voluntarily provide

How Do We Collect Your Data

Data collection by Gauld

Personal Data may be freely provided by the Client, whether through the Platform, Our Website, or otherwise, or, in case of Usage Data, collected automatically when using the Platform and/or Our Website.

Gauld collects Personal Data and processes Personal Data when You:

- Create an account on the Platform
- Buy or Sell precious metals via the Platform
- Enter into transaction with Gauld
- Voluntarily complete a customer survey/a poll or provide feedback via email
- Use or view Our Platform and/or Our Website via Your browser's cookies

Clients are responsible for any third-party Personal Data they publish on the Platform or on Our Website or otherwise share to Gauld.

Unless specified otherwise, all Personal Data requested by Gauld is mandatory and failure to provide this Personal Data may make it impossible for Gauld to allow the Client to create an account on the Platform and to enter into transactions with Gauld. In cases where Gauld specifically states that some Personal Data is not mandatory, Clients are Free not to communicate this Personal Data without consequences to the availability or the functioning of Our services.

Data collection by third parties

Gauld may share Your Personal Data with third-party service providers to facilitate various aspects of our customer due diligence but not for marketing purposes.

How Will We Use Your Data

Purposes of collection and processing

The Personal Data concerning the Client is collected to allow Gauld to provide You access to the Platform and to allow You to enter into transactions with Gauld, to comply with its legal obligations, to respond to enforcement requests, to protect its rights and interests (or those of its Clients or third parties), to detect any malicious or fraudulent activity, as well as the following:

- Creation of a Client account on the Platform

- Registration and authentication on the Platform
- Contacting the Client (notably, without limitation, via email, [WhatsApp, Viber]...)
- Handling payments, when applicable
- Analytics
- Client database management
- Managing contacts and sending messages
- Location-based interactions
- Platform services and hosting and interaction with external social networks and platforms

Data sharing with third parties

No. only under express request of the clients for specific services as the Vault Protection service for instance When Gauld processes Your registration as a Client, it may send Your Personal Data to, and also use the resulting information from, credit reference agencies to prevent fraudulent acts Please be assured that when Gauld discloses Your Personal Data to third parties, Gauld requires them to ensure that any Personal Data disclosed to them is kept confidential and secured. Gauld wishes to emphasize that it does not sell Personal Data to any third parties or authorities and shall remain fully compliant of any duty or obligation of confidentiality imposed on it under the applicable agreement(s) and/or Terms and Conditions that govern its relationship with You or any applicable law.

How Do We Store Your Data

Methods of processing

Gauld takes appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of Personal Data.

Gauld keeps Your Personal Data on highly secured servers in Singapore, that only Gauld's authorized technicians and employees can access. Your Personal Data is stored so that no unauthorized person can access them, and, unless otherwise specified, they are used by Gauld with the only aim to pass on You the offers which fit You best.

The Personal Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to Gauld, in some cases, the Personal Data may be accessible to certain types of persons in charge, involved with the operation of the Platform and of Our Website (administration, sales, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by Gauld. The updated list of these parties may be requested from Gauld at any time.

Place

The Personal Data is processed at Gauld's operating offices and in any other places where the parties involved in the processing are located.

The laws applicable to the protection of Personal Data in such location may be different from those applicable in the Client's country of residence.

Depending on the Client's location, data transfers may involve transferring the Client's Personal Data to a country other than their own.

If Gauld is required to transfer Your Personal Data out of Your country of residence, Gauld will ensure that such transfers are compliant with the requirements under the applicable Data Protection Laws.

In this regard, Gauld will take such necessary measures to ensure that such overseas recipients are bound by legally enforceable obligations (such as local laws, data transfer agreements or binding corporate rules where applicable) to ensure that these overseas recipients provide a standard of protection to the Personal Data so transferred that is comparable to the protection under the applicable Data Protection Laws

Protection

Unfortunately, no Personal Data transmitted over or accessible through the Internet can be guaranteed to be 100% secure. As a result, while Gauld takes reasonable measures to protect all Personal Data in the manner detailed herein, We cannot ensure or warrant that Personal Data will be completely secure from misappropriation by hackers or from other nefarious or criminal activities, or in the event of a failure of computer hardware, software, or a telecommunications network. Gauld will notify Clients in the event We become aware of a security breach involving Personal Data in accordance with the requirements under applicable Data Protection Laws. By disclosing Your email address to Gauld for any reason, the Client expressly consents to receiving electronic notices from Gauld in the event of such a security breach.

Retention time

Gauld will process and store Your Personal Data for as long as required by the purpose they have been collected for and may be retained for longer due to applicable legal obligation or based on Your consent.

Therefore:

- Personal Data collected for purposes related to the performance of a contract between You and Gauld shall be retained until such contract has been fully performed.
- Personal Data collected for the purposes of Gauld's legitimate interests shall be retained as long as needed to fulfill such purposes.

Gauld may be allowed to retain Personal Data for a longer period whenever the Client has given consent to such processing, as long as such consent is not withdrawn. Furthermore,

Gauld may be obliged to retain Personal Data for a longer period whenever required to fulfil a legal obligation or upon order of an authority.

Once the retention period expires, Personal Data will be disposed of in a manner that protects the privacy of Personal Data in an appropriate way. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after expiration of the retention period.

Use for Marketing

Gauld would like to send You information about transactions that We think You might like or wish to participate to.

If You have agreed to receive such communications, You may always opt out at a later date.

You have the right at any time to stop Gauld from contacting You for such purposes.

If You no longer wish to be contacted for such purposes, please send Us an email informing Us of the same at contact@gauld.com or click the unsubscribe link provided in each of Our email. If You wish to unsubscribe or opt-out from any third party websites, You must go to that specific website to unsubscribe and/or opt-out.

What Are Your Data Protection Rights

Gauld would like to make sure You are fully aware of all of Your data protection rights. Every Client is entitled to the following:

The right to access - You have the right to learn if Personal Data is being processed by Gauld, obtain disclosure regarding certain aspects of the processing and request Gauld for copies of Your Personal Data undergoing processing. We may charge You a small fee for this service.

The right to rectification - You have the right to verify the accuracy of Your Personal Data request that Gauld update or correct any information You believe is inaccurate. You also have the right to request Gauld to complete information You believe is incomplete.

The right to erasure - You have the right to request that Gauld erase Your Personal Data, under certain conditions.

The right to restrict processing - You have the right to request that Gauld restrict the processing of Your Personal Data, under certain conditions. In this case, Gauld will not process Your Personal Data for any purpose other than storing it.

The right to object to processing - You have the right to object to Gauld's processing of Your Personal Data if the processing is carried out on a legal basis other than consent.

The right to data portability - You have the right to request that Gauld transfer the Personal Data that We have collected to You in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without any hindrance.

The right to lodge a complaint - You have the right to bring a claim before their competent data protection authority.

If You make a request, We have one (1) month to respond to You. If You would like to exercise any of these rights, please contact Us at Our email: contact@gauld.com

Or write to Us: to the attention of the Data Protection Officer, [68 Circular Road, #02- 01, Singapore 049422].

Any rectification or erasure of Personal Data or restriction of processing will be communicated by Gauld to each recipient, if any, to whom the Personal Data has been disclosed unless this proves impossible or involves disproportionate effort. At the Client's request, Gauld will inform them about those recipients.

What Are Cookies

Cookies are text files placed on Your computer to collect standard Internet log information and visitor behavior information. When You visit Our Platform and Our Website, We may collect information from You automatically through cookies or similar technology.

This information might be about You, Your preferences or Your device and is mostly used to make the site work as You expect it to. The information does not usually directly identify You, but it can give You a more personalized web experience. Because Gauld respects Your right to privacy, You can choose not to allow some types of cookies. Click on the different category headings to find out more and change Your default settings. However, blocking some types of cookies may impact Your experience of the site and the services Gauld is able to offer.

For further information, visit https://allaboutcookies.org/.

How Do We Use Cookies

Gauld uses cookies in a range of ways to improve Your experience on Our Platform and Our Website, including:

- Keeping You signed in.
- Understanding how You use the Platform and Our Website.
- Enhance Your browsing experience.

- Analyze Our traffic.

What Type of Cookies Do We Use

There are a number of different types of cookies, however, the Platform and Our Website uses:

- **Necessary cookies** – These cookies are set to provide the service, application or resource requested. Without these cookies, Our service cannot be properly delivered. They are usually set to manage actions made by You, such as requesting website visual elements, pages resources or due user login/logoff. We can also use these cookies to set up essential functionalities to guarantee the security and efficiency of the service requested, like authentication and load balancer request.
- **Preference cookies** – Preference cookies enable Us to remember information that changes the way the Platform and/or the Website behaves or looks, like Your preferred language or the region that You are in.
- **Statistic cookies** – These cookies are set to provide quantitative measures of website visitors. Information collected with these cookies is used in operations to measure website or software KPIs, such as performance. With the usage of these cookies, We are able to count visits and traffic sources to improve the performance of Our Platform and of Our Website. If You do not allow these cookies, We will not know when You have visited Our site.

How to Manage Cookies

You can set Your browser not to accept cookies, and the above website tells You how to remove cookies from Your browser. However, in a few cases, some of the Platform's and Website's features may not function as a result.

Privacy Policies of Other Websites

The Platform and Our Website contain links to other websites. Our privacy policy applies only to Our Platform and Our Website, so if You click on a link to another website, You should read their privacy policy.

Changes to Our Privacy Policy

Gauld keeps its privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 20 May 2024.

Gauld reserves the right to make changes to this privacy policy at any time by notifying its Clients on the Platform or Our Website and/or - as far as technically and legally feasible - sending a notice to Clients via any contact information available to Gauld. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom.

Should the changes affect processing activities performed on the basis of the Client's consent, Gauld shall collect new consent from the Client, where required.

How to Contact Us

If You have any questions about Gauld's privacy policy, the data We hold on You, or You would like to exercise one of Your data protection rights, please do not hesitate to contact Us.

Email Us at: contact@gauld.com

Or write to Us: to the attention of the Data Protection Officer, 68 Circular Road, #02- 01, Singapore 049422.

How to Lodge a Complaint

Should You wish to report a complaint or if You feel that Gauld has not addressed Your concern in a satisfactory manner, You may bring a claim before Your competent data protection authority.

Definitions:

"Client(s)" or "You" or similar expressions

The registered users of the Platform and Our Website.

"Cookie"

Cookies are Trackers consisting of small sets of data stored in the Client's browser.

“Data Controller”

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Gauld. The Data Controller, unless otherwise specified, is Gauld.

“Data Processor”

The natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of Gauld. The Data Controller, unless otherwise specified, is Gauld.

“Data Processor”

The natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller, as described in this privacy policy.

“Data Protection Laws”

Means all applicable laws and regulations in any jurisdiction which relate to the collection, disclosure, use or processing of Personal Data, including without limitation to the Singapore Personal Data Protection Act 2012 (“PDPA”) and the General Data Protection Regulation (“GDPR”), including all amendments thereto and subsidiary legislation enacted thereunder, whether now or in the future.

“Gauld” or “We” or similar expressions

Gauld Pte. Ltd., a private limited company registered with the Accounting and Corporate Regulatory Authority (ACRA) in Singapore under the registration number 202322976N, which is the owner of the Platform.

“Platform”

Means the online Platform operated and maintained by Gauld, consisting of a trading platform, computer devices, software, databases, telecommunication hardware, programs and technical facilities, which facilitates trading activity of the Client via its account on the Platform;

“Personal Data”

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or identifiability of a natural person.

“Terms and Conditions”

The terms and conditions outlined under the URL address www.gauld.com as may be amended or supplemented from time to time.

“Tracker”

Tracker indicates any technology - e.g Cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprinting - that enables the tracking of Clients, for example by accessing or storing information on the Client’s device.

“Usage Data”

Information collected automatically through Gauld (or third-party services employed in Gauld), which can include:

The IP addresses or domain names of the computers utilized by the Clients who use the Platform and Our Website, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server’s answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the Client, the various time details per visit (e.g., the time spent on each page of the Platform and Our Website) and the details about the path followed within the Platform and Our Website with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the Client’s IT environment.

“Website”

The web platform and services hosted under the URL address www.gauld.com or any URL which may replace it.