

Sunrate Privacy Policy (v3.2)

Sunrate is a global payment and treasury management platform. We empower companies worldwide with our cutting-edge proprietary platform, extensive global network, and robust APIs to operate and scale both locally and globally.

This Privacy Policy is designed to provide information about how we collect, use, manage, update, display, transmit, retain, disclose, share, protect, delete, or otherwise process (collectively, “**process**”) personal data when we provide our Services, so you can continue to trust Sunrate to handle your personal data in a fair, secure, and lawful manner.

This Privacy Policy also outlines your rights and choices as a data subject, as well as the ways in which you may contact us regarding the processing of your personal data. Please ensure that you read and fully understand it.

This Privacy Policy applies to all Services provided by Sunrate entities globally. Any Sunrate entity may act on behalf of other Sunrate entities in entering into this Privacy Policy with you, and all Sunrate entities will process personal data in accordance with this Privacy Policy.

We are committed to fully complying with all applicable legal and regulatory requirements regarding personal data. If mandatory laws or regulations require processing beyond the scope of this Privacy Policy, we will adjust our practices accordingly to meet those obligations.

If you have any questions about how we use your personal data, you can get in touch by the method set out in *Section 13 (Data Protection Officer)* of this Privacy Policy.

1. Scope of Policy

1.1. This Privacy Policy applies to you when you use or interact with Sunrate Services worldwide, including our website, mobile app, or other channels (collectively, “Sites”). “Sunrate Service” and “Service” refer to any products, services, devices, technologies, functionalities, and applications provided by Sunrate entities, as may be updated from time to time. Capitalised terms used but not defined in this Privacy Policy shall have the meanings given to them in the User Agreement.

1.2. Depending on the context, as a data subject, “you” might be a **Business Customer**, **Representative**,

Individual Customer, **End User**, or **Visitor**:

- You are a “**Business Customer**” if you are a business entity to which we provide our Services directly.
- You are a “**Representative**” if you are an individual who owns, controls, or acts on behalf of a Business Customer, such as its director, officer, employee, authorised signatory, or ultimate beneficial owner.
- You are an “**Individual Customer**” if you are an individual who directly enters into an agreement with us or uses Sunrate Services in your personal capacity for your own personal or business purposes, where such Services are provided directly to you rather than through a Business Customer.
- You are an “**End User**” if you do business with, or otherwise transact with, a Business Customer through Sunrate Services (for example, when you make or receive a payment via a Business Customer that uses Sunrate for payment processing), but are not directly contracting with Sunrate or using the Service.
- You are a “**Visitor**” if you are an individual who visits our Sites or otherwise interacts with us without logging into a Sunrate Account or using our Services.

1.3. By providing us with another data subject's personal data, you confirm that you have their consent and that they are aware of and agree to our processing of their personal data under this Privacy Policy.

2. Data Controller and Data Processor

2.1. As used in this Privacy Policy, “we”, “us”, “our,” and “Sunrate” refer to the Sunrate entity that acts as a “data controller” or “data processor” regarding your personal data. The Sunrate entity responsible for your data may vary depending on your location, the entity you used to enter into an agreement with Sunrate, the product or Service you use with us, and whether Sunrate is acting as a controller or a data processor. For certain products, Sunrate may act as a data controller, a data processor, or both.

2.2. Depending on the nature of the processing activity and our relationship with you, Sunrate may act as an independent data controller, a joint data controller with third parties (such as financial institution partners or co-licensed entities in certain jurisdictions), or simultaneously as both a controller and a processor in the same service interaction.

2.3. Where Sunrate acts as a data controller, it determines the purposes and means of processing your personal data and is responsible for ensuring such processing complies with applicable data protection laws, including maintaining appropriate technical and organisational measures and honouring your data subject rights. This Policy applies to all processing activities carried out by Sunrate in its capacity as a data controller.

Please visit our *Regulatory Information Page* for details of Sunrate data controllers and their contact information.

2.4. Where we process personal data on behalf of a Business Customer, partner, or other third-party controller in connection with the Services, we act as a processor and process such personal data in

accordance with their documented instructions, the applicable agreement, and applicable law. In these cases, the relevant controller's privacy policy, rather than this Policy, governs its collection and use of personal data relating to End Users and other individuals whose data it provides to us, and that controller remains responsible for providing appropriate privacy notices and obtaining any required consents.

This Policy continues to apply to Sunrate's processing activities carried out in its capacity as a controller, including those related to service administration, security, compliance, and operation of the platform.

2.5. Sunrate entities also provide local support services in certain countries where Sunrate operates. These entities may act as data processors on behalf of Sunrate, depending on the jurisdiction. Sunrate, as the Data Controller, remains responsible for ensuring that any such data processors process personal data only in accordance with Sunrate's instructions and applicable data protection laws.

3. Types of Personal Data We Collect

Personal data refers to any information that directly or indirectly allocates your identity, such as your name, address, telephone number, email address, date of birth, payment card information, bank account information, and any other information that is associated with your identity.

This Section provides different types of personal data we collect from you.

3.1. Information Directly Provided by You

You may provide personal data to us directly when you apply for, use, or interact with the Services, including contact details, account and profile information, identity verification information, payment and beneficiary information, communications with us, and any other information you choose to provide in connection with the Services.

3.1.1. Information Necessary for Sunrate Services

To use or interact with Sunrate Services, you need to provide certain personal data to us, including, but not limited to, contact details; information required to establish an account profile; identity verification information; financial information; and information regarding beneficiaries of payments. Some of this information is required by law, including information needed for identity verification, anti-money laundering, sanctions screening, fraud prevention, and related compliance purposes; some is required for us to enter into or perform our contract with you and to provide the Services.

This information is necessary for us to perform the contracted Services and to comply with our legal obligations. If you are not able or willing to provide this information, we may not be able to provide you with all the requested Services. This may include, for example, being unable to create or maintain your account, complete identity verification or compliance checks, process transactions, or otherwise provide certain features of the Services.

3.1.2. Optional Information

Some information you provide to us is optional and not mandatory; such information may be provided through your response to our surveys, feedback about our Services, participation in promotions or contests, or your communication with us.

This information allows us to provide you with incentives or additional features, evaluate our performance, and improve your experience with the Sunrate Service. This additional information will be processed based on our reasonable discretion, applicable legal basis, or, when applicable, your consent.

3.2. Information Automatically Collected When You Use Sunrate Services

Certain personal data is automatically collected from you when you use the Services or visit any of our Sites, and we have a legitimate interest (such as preventing fraud or misuse, understanding your use of, and improving our Services) in doing so. This may include, but is not limited to, transaction data, beneficiary information, card-related information, usage data, device information, recordings, log data, and location information.

3.3. Information Provided by Third Parties

We may also receive your personal data from third parties, including but not limited to, business and financial partners, payment service providers, service providers, financial institutions, fraud prevention partners, public registers, publicly available sources, and Business Customers through whom you access Sunrate Services. We may combine this information with personal data collected directly from you for the purposes set out in this Privacy Policy. Such collection and sharing will also be described in the relevant third parties' own privacy policies or other information provided to you.

3.4. Information Technologies We Use

We use technologies (i.e., cookies, web beacons, pixels, ad tags, and device identifiers) to recognise you, prevent fraud and secure our systems and network, and to customise your online experience. To learn more about the cookies we may utilise, please refer to our Cookie Policy.

4. Categories of Personal Data and How We Process Them

4.1. This section provides a detailed list of categories of personal data we collect from you to illustrate how we process it.

Personal Data		Data subject	Source of data	Purpose of Processing	Legal basis
Sunrate Account and profile information	Name, email address, phone number, date of birth, account credentials	Representative ; Individual Customer	Provided by Representative or Individual Customer	Sunrate Account creation, customer relationship management, service provision	Contract performance ; Legitimate interests
Identity verification information	Passport, national ID, driver's licence, proof of address, verification photos	Representative ; Individual Customer	Provided by Representative, Individual Customer, or a service provider	Identity verification, AML compliance, regulatory screening	Legal obligation; Legitimate interests
Business entity information	Company name, company registration	Representative	Provided by Representative or obtained from public	Merchant onboarding, compliance checks, business	Legal obligation; Contract

	number, corporate structure, shareholder information		registries	relationship management	performance
Transaction information	Transaction amount, transaction date, merchant details, payment reference	Representative ; Individual Customer; End User	Generated during payment transactions	Payment processing, settlement, reconciliation, financial reporting	Contract performance ; Legal obligation
Payment instrument information	Bank account details, card information, billing address	Representative ; Individual Customer; End User	Provided by Representative, Individual Customer, or payment partners	Payment execution, settlement, transaction authentication	Contract performance
Beneficiary information	Recipient name, ;	Representative ;	Provided by Representative,	Payment execution and	Contract performance

	recipient bank	Individual Customer; End User	Individual Customer	settlement	
Device and technical information	IP address, device identifier, browser type, operating system	Representative , Individual Customer; End User, or Visitor	Automatically collected from devices or systems.	Fraud detection, system security, service operation	Legitimate interests
Usage and activity information	Login records, system activity logs, platform usage data	Representative , Individual Customer; End User, or Visitor	Generated through the use of Services	Platform performance monitoring, analytics, and service improvement	Legitimate interests
Communication information	Emails, customer support tickets, call recordings	Representative ; Visitor; Individual Customer; End	Provided during communications with us	Customer support, complaint handling, dispute	Contract performance ; Legitimate interests

		User		resolution	
Location information	IP-based location, device location data	Representative, Individual Customer; End User, or Visitor	Automatically collected from devices.	Fraud prevention, security monitoring	Legitimate interests
Marketing information	Marketing preferences, survey responses, and event participation information	Representative; Individual Customer; End User; Visitor	Provided by Representative, Individual Customer; Visitor	Marketing communications, event administration, and product improvement	Consent; Legitimate interests
Cookies and tracking data	website usage tracking	Representative, Individual Customer; End User; Visitor	Automatically collected through website technologies	Functionality, analytics, and advertising measurement	Consent; Legitimate interests

Where we rely on legitimate interests as the legal basis for processing, we have assessed that your

interests or fundamental rights and freedoms do not override our interests. This includes processing carried out for the purposes of fraud prevention, financial crime detection, service security, and service improvement.

4.2. In certain limited circumstances, we may process special categories of personal data or other sensitive personal data where permitted by applicable laws and regulations. Such processing will only take place where it is necessary to provide our Services, to comply with legal or regulatory obligations, or where you have provided your explicit consent, as required by applicable law. We implement appropriate safeguards to protect such data and ensure that it is processed in accordance with applicable data protection laws.

5. Sharing of the Data and International Transfer

5.1. We may share your personal data with third parties or affiliates only where necessary. If you would like further information about the third parties to whom we may transfer personal data, the jurisdictions in which they are located, or the safeguards and contractual arrangements used for international transfers, you may contact us at dpo@sunrate.com.

Receiving Parties	Why We Share It	Notes
Sunrate Entities	To facilitate or support the provision of the Services, we may disclose your personal data to other members of the Sunrate Group for operational support, customer support, technical	All Sunrate entities will only process personal data in accordance with the applicable intra-group data sharing arrangements governing such

Receiving Parties	Why We Share It	Notes
	<p>services, service improvement, fraud prevention, compliance and related internal business purposes.</p>	<p>processing and for the purposes set out in this Privacy Policy.</p>
<p>Banks, Financial Institutions, and Third-Party Payment Service Providers</p>	<p>We may share your personal data where necessary to initiate, process, route, clear, or settle transactions, provide account-related services, or otherwise support the payment services you request.</p>	<p>This may include personal data contained in payment instructions or related transaction records, to the extent required for the relevant payment flow. These recipients may process such data as independent controllers or in accordance with their own regulatory obligations.</p>
<p>Third-Party Platforms and Integration Partners</p>	<p>We may share personal data where necessary to enable the use of Sunrate Service Codes, facilitate the receipt of funds, support platform integrations, or otherwise enable the relevant partner-enabled functionality you request.</p>	<p>Such sharing is limited to the personal data reasonably necessary for the relevant integration or platform functionality. These partners are required to handle personal data in accordance with applicable data protection laws and any</p>

Receiving Parties	Why We Share It	Notes
		applicable contractual restrictions.
Third-party Service Providers, including Anti-money Laundering (AML), Identity Verification, Sanctions Screening, and Compliance Service Providers	We may share personal data with service providers that assist us in fraud prevention, identity verification, sanctions screening, anti-money laundering, counter-terrorist financing, compliance monitoring, investigations, and related risk management activities.	These providers process personal data only to the extent necessary to perform the services we request, subject to appropriate contractual and security obligations.
Third-party Service Providers, including Technology, Security, and Cloud Infrastructure Providers	We may share personal data with technology service providers where necessary to host, support, secure, maintain, or improve our Services and related systems.	These providers are engaged under appropriate contractual arrangements and may not use personal data for their own purposes except as permitted by applicable law.
Government Authorities, Regulatory Bodies, Law Enforcement Agencies, Judicial Authorities, or	We may disclose personal data where required or permitted by applicable law, including to comply with legal or regulatory obligations, respond to	Any such disclosure will be made only to the extent required or permitted by applicable law and in accordance with our internal

Receiving Parties	Why We Share It	Notes
<p>Other Competent Authorities</p>	<p>lawful requests, court orders, subpoenas, or regulatory inquiries, and prevent, detect, or investigate unlawful activity or threats to security.</p>	<p>procedures. In some cases, we may be prohibited from notifying you of the disclosure.</p>
<p>Authorised Users</p>	<p>Where a Representative or Individual Customer authorises other users to access or manage Sunrate Services, or where a user makes or receives a payment through Sunrate Services, certain personal data may be visible to authorised users as necessary to operate the Sunrate Account or complete the relevant transaction.</p>	<p>Such visibility is limited to the personal data reasonably necessary for the relevant account administration or transaction activity.</p>
<p>Professional Advisers, Auditors, and Corporate Transaction Counterparties</p>	<p>We may disclose personal data to our professional advisers, auditors, insurers, financing counterparties, or prospective buyers, sellers, investors, or other counterparties in connection with audits, financing, restructuring,</p>	<p>Any such disclosure will be subject to appropriate confidentiality protections and carried out following applicable data protection laws. Where required by law, affected individuals will be informed.</p>

Receiving Parties	Why We Share It	Notes
	mergers, acquisitions, disposals, or other corporate transactions.	

5.2. Certain Sunrate Services may be provided by our affiliates, personnel, or third parties located in other jurisdictions (such as intermediary banks or beneficiary banks). Accordingly, we may need to transfer your personal data to countries or regions outside the country or region where you are located in order to provide you with our services:

5.2.1. As we operate globally, your personal data may also be processed in other jurisdictions where Sunrate entities or our service providers are located.

5.2.2. When transferring personal data to other countries or regions, we will implement appropriate safeguards to ensure compliance with applicable laws and regulations governing such transfers. In particular, where the laws and regulations of the destination country or region provide a lower level of protection than those of your country or region, we will take appropriate measures to ensure that your personal data remains adequately protected and is processed in accordance with this Privacy Policy.

5.2.3. Where applicable laws and regulations require the use of a specific mechanism for the transfer of personal data, we will implement appropriate measures, including:

- transferring personal data to countries or recipients recognised as providing an adequate level of protection under applicable laws and regulations;
- entering into standard contractual clauses (SCC), International Data Transfer Agreement (IDTA), or any equivalent standard contracts issued by relevant authorities with the relevant recipients;

or

- using other lawful transfer mechanisms permitted under applicable laws and regulations.

You may contact us at dpo@sunrate.com to request information about the safeguards applicable to international transfers of your personal data, including, where appropriate, a copy or summary of the relevant transfer mechanism, subject to applicable legal and confidentiality restrictions.

In limited circumstances where a transfer of personal data to another jurisdiction cannot rely on an adequacy decision, standard contractual clauses, or other recognised transfer mechanisms under applicable laws and regulations, we may rely on your explicit consent for such transfer where permitted by law. In such cases, we will inform you of the potential risks associated with the transfer due to the absence of an adequate level of data protection in the destination jurisdiction.

5.3. To the extent permitted by applicable laws and regulations, you acknowledge and agree that the third parties with whom we share your personal data, and any subsequent recipients with whom such third parties further share the information, may process the personal data in accordance with this Privacy Policy.

6. Data Retention

6.1. Locations, Purposes and Periods

We primarily store your personal data in Hong Kong and Singapore. We will retain your personal data only for as long as necessary to fulfil the purposes for which it was collected. Certain information, including but not limited to regulatory-related information (such as information required for anti-money laundering and counter-terrorist financing purposes), will be retained for no less than ten (10) years in accordance with applicable regulatory requirements, unless a longer retention period is

required under applicable laws and regulations.

For other categories of personal data, retention periods are determined based on the nature of the data and the purposes for which it was collected, taking into account applicable legal and regulatory requirements.

6.2. Deletion and Disposal

Where applicable laws and regulations, or the jurisdictions in which we operate, no longer require the retention of the relevant personal data, or where you have withdrawn your consent and we have no other legal basis to continue processing such data, we will delete or otherwise dispose of such information. These processes may be carried out automatically, and you do not need to contact us to request deletion.

6.3. Deletion and Disposal Methods

Deletion or disposal shall be carried out in a manner that ensures the personal data is rendered permanently irrecoverable, and may include physical destruction of storage media, permanent erasure or secure overwriting of electronic records, anonymisation or pseudonymisation, rendering re-identification no longer reasonably possible, or such other methods as are recognised under applicable laws and regulations.

Where deletion is carried out by a third-party service provider, we will ensure that appropriate contractual obligations are in place to verify that the data has been securely deleted in accordance with our instructions.

6.4. Exceptions to Deletion

We may retain your personal data even after you cease to use our Service or request deletion of your personal data. Examples of such cases include:

- 6.4.1. To process transactions initiated before the relevant Sunrate Account was closed or deactivated.
- 6.4.2. To comply with applicable anti-money laundering requirements and other applicable laws and regulations.
- 6.4.3. To detect, prevent or investigate fraud and other loss prevention matters.
- 6.4.4. To comply with legal process, court orders, or requests from law enforcement authorities.
- 6.4.5. To recover any fees or other amounts due and owing by you to us.
- 6.4.6. To satisfy our tax, accounting, financial and regulatory reporting obligations.
- 6.4.7. Where necessary to comply with our contractual obligations to third-party partners.
- 6.4.8. To resolve disputes or to establish, exercise, or enforce our rights under relevant service agreements or other applicable agreements or policies.
- 6.4.9. To take any other action or exercise any other rights as permitted or required by applicable law.

Where we retain your personal data following a deletion request based on one or more of the exceptions set out above, we will limit our processing of such data to the extent necessary for the applicable purpose. We will not use it for any other purpose.

7. Your Rights and Choices

You may have certain rights under applicable data protection laws in relation to your personal data. The availability and scope of these rights may vary depending on the laws applicable in your jurisdiction. Please refer to *Appendix I (Country/Region Specific Provisions)* for specific privacy rights applicable in your country or region.

If you do not directly use Sunrate Services, you may exercise your data subject rights by contacting us directly at dpo@sunrate.com, and we will respond in accordance with applicable laws and regulations.

7.1. Access and Correction

You may have the right to request access to the personal data we hold about you and to request that inaccurate or incomplete personal data be corrected or updated.

We may need to verify your identity before responding to such requests. In certain circumstances, applicable laws may allow or require us to refuse or limit access to personal data. For example, where providing access would adversely affect the rights of another individual or where the information is subject to legal privilege or other legal restrictions.

7.2. Erasure

You may have the right to request that we delete or remove personal data that we hold about you in certain circumstances.

However, this right may be subject to certain legal limitations. For example, we may retain personal data where it is necessary to comply with legal or regulatory obligations, resolve disputes, enforce agreements, or for other legitimate business purposes permitted under applicable laws.

7.3. Restriction of Processing

You may have the right to request that we restrict the processing of your personal data in certain circumstances. We will also inform any third party to whom we have disclosed relevant personal data to stop the processing upon your request to us.

Where processing is restricted, we may store your personal data, but we will not otherwise process it unless permitted by applicable laws or with your consent. Where we intend to resume processing

your personal data after a restriction has been lifted, we will notify you in advance and, where required by applicable law, obtain your consent before doing so.

7.4. Data Portability

Where provided by applicable laws, you may have the right to receive certain personal data you have provided to us in a structured, commonly used, machine-readable format, and to request that such data be transmitted to another service provider where technically feasible, with certain exceptions. This includes any personal data we process either based on your consent or as necessary to perform our contract with you, such as transaction-related data. We will provide you with additional details if you request them.

7.5. Objection

Where permitted by applicable laws, you may have the right to object to our processing of your personal data where the data processing relies on the basis of legitimate interests or undertaking a task in the public interest.

7.6. Withdrawal of Consent

Where we rely on your consent to process your personal data, you may withdraw your consent at any time. Withdrawal of consent will not affect the lawfulness of processing carried out before such withdrawal.

Upon withdrawal of consent, we will cease processing your personal data for the relevant purposes as soon as reasonably practicable. Where we no longer have a legal basis to retain such data, we will delete or dispose of it in accordance with the deletion methods described in Section 6 (Data Retention) of this Privacy Policy.

7.7. Exercising Your Rights

If you wish to exercise any of the rights described above, please get in touch with us at dpo@sunrate.com. We may request additional information from you to verify your identity before processing your request.

Where permitted by applicable data protection laws, you may also have the right to lodge a complaint with a competent data protection authority or supervisory authority if you believe that our processing of your personal data violates applicable laws.

8. Application and Updates of the Privacy Policy

8.1. This Privacy Policy (including its main body, the Appendices), the content on Sunrate's Sites, transaction enquiries, transaction receipts, and the information processing provisions contained in the relevant service agreements, together constitute the entire agreement between Sunrate and you regarding the processing of information.

8.2. In order to reflect changes in applicable laws and regulations, the way you use the Sunrate Services, or the manner in which we process personal data, we may revise this Privacy Policy from time to time and will notify you where appropriate.

9. Security

9.1. We implement and maintain appropriate technical, physical, and procedural safeguards designed to protect your personal data against loss, misuse, and unauthorised access, disclosure, or alteration. These safeguards include measures such as actively maintained firewalls, up-to-date anti-virus software, encryption protocols, and restricted physical access controls to our servers.

9.2. In the event of a personal data breach, we will take prompt steps to contain and remediate such breach. Where required by applicable laws and regulations, we will notify the relevant supervisory authority and, where the breach is likely to result in a high risk to your rights and interests, affected individuals, within the timeframe prescribed by applicable law. We will also maintain internal records of all personal data breaches in accordance with our legal obligations.

For the purpose of this Privacy Policy, a personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed by us.

10. Marketing

Where permitted by applicable laws and regulations, we may send you marketing or promotional communications about our products, services, or offers that may be of interest to you. Where required by applicable law, we will obtain your consent before doing so. You may withdraw your consent or opt out at any time by following the unsubscribe instructions in the communication or by contacting us using the contact details provided in this Privacy Policy. We will not share your personal data with third parties for their own marketing purposes without your consent.

11. Children's Privacy

11.1. Where we collect, use, or disclose personal data relating to a child, we will do so in accordance with applicable law and, where required, obtain the consent of the parent, guardian, or person having legal custody of the child.

11.2. If we become aware that personal data relating to a child has been collected without the

required consent or other valid legal basis, we will take appropriate steps in accordance with applicable law, including obtaining the required consent or deleting such personal data where appropriate.

12. Automated Decision-making and Artificial Intelligence

We may use automated decision-making and profiling in limited circumstances, including for fraud screening, sanctions screening, and risk scoring during onboarding or transaction processing, using inputs such as your identity details, transaction patterns, and third-party data. Where we use your personal data for such purposes, including profiling, that produces legal or similarly significant effects on you, we will obtain your explicit consent where required by applicable law. Possible outcomes of such processing include delays, requests for additional verification, or account access restrictions. We do not rely solely on automated decision-making to produce legal or similarly significant effects unless permitted by applicable law and subject to appropriate safeguards. Where required by law, you have the right to request human review and to contest any such decision by contacting us at dpo@sunrate.com.

We may also use artificial intelligence tools and other automated technologies in connection with our Services, including for search and retrieval functions, customer support, operational support, compliance, and service improvement. These tools may assist users or our personnel in accessing information, generating summaries, or supporting workflows, but do not necessarily involve automated decision-making about individuals. We apply appropriate internal governance and human oversight to our use of AI tools to help ensure that such use remains consistent with applicable law and this Privacy Policy. Where required by applicable law, you may have the right to

information about how AI tools affect the processing of your personal data and to seek human review of any output that significantly affects you, by contacting us at dpo@sunrate.com.

13. Data Protection Officer

We have appointed a Data Protection Officer (“DPO”) to oversee matters relating to this Privacy Policy.

If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the contact details provided below:

Sunrate Data Protection Officer

Email Address: dpo@sunrate.com

Revised on 3 July 2026

Effective on 3 July 2026

Appendix 1 Country/Region Specific Provisions

Singapore

Access and Correction

Where the *Personal Data Protection Act 2012* of Singapore (“PDPA”) applies, you may request access to your personal data in our possession or control, as well as information about the ways in which your personal data has been used or disclosed by us within the preceding twelve (12) months, subject to any exceptions under applicable law.

You may also request correction of your personal data. Under the PDPA, if your personal data is corrected, we will send the corrected personal data to other organisations to which we disclosed the personal data within the preceding year, unless you agree that such corrected personal data need not be sent to those organisations, or an exception applies.

Withdrawal of Consent

Where we rely on your consent, you may withdraw that consent on reasonable notice. Upon receipt of your withdrawal request, we will inform you of the likely consequences of such withdrawal and will cease collecting, using, or disclosing your personal data for the relevant purposes, unless otherwise permitted or required by law.

Contact and Complaints

For questions or requests relating to the PDPA, please get in touch with our Data Protection Officer at: dpo@sunrate.com. If you have concerns about how we handle your personal data, please contact our Data Protection Officer first. If you are not satisfied with our response, you have the right to raise your concern with the Personal Data Protection Commission of Singapore.

Data Breach Notification

In addition to our general breach notification practices, where required under the PDPA, we will notify the Personal Data Protection Commission within three (3) calendar days after making the assessment that a breach is notifiable, and notify affected individuals as soon as practicable.

Hong Kong

Data Access Requests

We will respond to a data access request within the timeframe required under the Personal Data (Privacy) Ordinance (Cap. 486) (“PDPO”) (generally within forty (40) days). Where permitted under the PDPO, we may charge the applicable fee for processing a data access request.

Data Correction

You may request correction of personal data that you believe is inaccurate. Where we are satisfied that the personal data is inaccurate, we will make the necessary correction within the timeframe required by applicable law (generally within forty (40) days). If we are unable to comply with the request, we will inform you of the reasons within the same period and comply as soon as practicable thereafter.

Contact and Complaints

If you have any questions or concerns regarding our handling of your personal data in Hong Kong, you may contact us at: dpo@sunrate.com. You also have the right to lodge a complaint with the Office of the Privacy Commissioner for Personal Data (PCPD) in Hong Kong.

United Kingdom

Automated Decision-Making

We may use automated systems and profiling tools in connection with fraud prevention, anti-money laundering, sanctions screening, and identity verification. Where, under UK data protection law, a decision concerning you is made solely by automated means, without human involvement, and produces legal or similarly significant effects, you may have the right to obtain human intervention, express your point of view, and contest the decision.

International Transfers

Where we transfer your personal data outside the United Kingdom, we will do so in accordance with applicable UK data protection laws. Such transfers will be subject to appropriate safeguards, including reliance on adequacy regulations made under the UK GDPR, the use of the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, or such other transfer mechanisms as may be recognised under applicable UK data protection laws.

Contact and Complaints

If you have any questions or concerns regarding our handling of your personal data in the United Kingdom, please contact us at dpo@sunrate.com. You also have the right to lodge a complaint with the Information Commissioner's Office at www.ico.org.uk.

Malaysia

Right of Access and Correction

Under the Malaysian Personal Data Protection Act 2010 ("Malaysian PDPA"), we may charge the applicable fee for responding to a data access request, where permitted by law. To protect your privacy and security, we may require information reasonably necessary to verify your identity and, where applicable, to locate the personal data requested before processing an access or correction request.

Sensitive Personal Data

We process sensitive personal data only where we have obtained your explicit consent, or where such processing is otherwise permitted under applicable law, including in limited circumstances recognised by law. Where applicable, we implement additional safeguards for the processing of such data.

Your Rights under the Malaysian PDPA

In addition to the rights set out in this Privacy Policy, you may also have the right to require us to cease, or not begin, processing your personal data where such processing is causing, or is likely to cause, substantial and unwarranted damage or distress to you or another person.

Contact and Complaints

For questions or requests regarding the Malaysian PDPA, please get in touch with our Data Protection Officer at dpo@sunrate.com. If you are not satisfied with our response, you may refer your complaint to the Department of Personal Data Protection (Jabatan Perlindungan Data Peribadi) at www.pdp.gov.my.

Appendix 2 Cookie Policy

1. Introduction

This Cookie Policy explains how Sunrate (“Sunrate”, “we”, “us”, or “our”) uses cookies on our websites, mobile applications, and other digital channels that link to this Cookie Policy (collectively, the “Sites”).

Please read this Cookie Policy together with our Privacy Policy, which explains how we collect, use, disclose, and otherwise process personal data, your rights in relation to your personal data, and how you can contact us.

Where required by applicable laws and regulations, we will obtain your consent before placing non-essential cookies or similar technologies on your device. You may manage your preferences through the cookie banner or Cookie settings made available on the relevant Site.

Where cookies involve the processing of personal data, you may have rights under applicable data protection laws. For more information about your rights and how to exercise them, please see our Privacy Policy or contact our Data Protection Officer.

2. What Are Cookies?

Cookies are small text files that are placed on your browser, computer, mobile device, or other device when you visit a website. Cookies allow a website to recognise your device and store certain information about your preferences or past actions.

We may also use similar technologies, such as web beacons, pixels, tags, SDKs, scripts, local storage, and session replay or analytics tools, where applicable. For ease of reference, we refer to all such technologies in this Cookie Policy as “cookies”, except where the context otherwise requires.

Cookies may be:

- First-party cookies, which are set directly by Sunrate, or
- Third-party cookies, which are set by third parties that provide services to us or enable certain features on the Sites.

Cookies may also remain on your device for different periods of time:

- Session cookies, which expire when you close your browser; and
- Persistent cookies, which remain on your device until they expire or are deleted. Where required by applicable law, persistent cookies will not be retained for longer than necessary for their stated purpose.

3. Categories of Cookies We Use

We may use the following categories of cookies on the Sites:

3.1. Necessary Cookies

These cookies are strictly necessary for the operation of the Sites and to provide services requested by you. They may include cookies used to:

- maintain network and information security;
- authenticate users and prevent fraudulent or unauthorised access;
- enable core website functionality;
- support session management and load balancing;
- remember privacy settings or cookie preferences.

Necessary cookies are always active because, without them, the Sites or requested services may not function properly. Where applicable law permits, we do not require your consent for these cookies.

3.2. Functional Cookies

These cookies are not strictly necessary. Where required by law, we will ask for your consent before placing these cookies on your device. If you do not consent, or later withdraw your consent, some personalised features may not function as intended. These cookies allow the Sites to remember choices you make and provide enhanced, personalised features, such as:

- language preferences;
- region or country selection;
- login state;
- user interface preferences.

If you turn off these cookies, some features or personalisation may not function as intended.

3.3. Analytics Cookies

These cookies help us understand how the Sites are used, including which pages are visited, how users navigate, how long sessions last, and whether technical issues occur. We use this information to improve the Sites, services, and user experience.

Depending on the tools deployed on the Sites, analytics cookies may be provided by third-party analytics providers or by us. Where required by applicable laws and regulations, we will use analytics cookies only with your consent, unless an exemption applies under applicable law.

3.4. Advertising and Marketing Cookies

These cookies may be used to:

- record your visits to the Sites, the pages you have viewed, and the links you have followed;
- deliver advertisements more relevant to your interests;
- measure the effectiveness of advertising campaigns;

- help us understand whether marketing communications or advertisements are effective.
- support remarketing through third-party advertising platforms.

These cookies may be set by us or by third-party advertising, social media, or analytics partners.

Where required by applicable laws and regulations, we will only use these cookies with your consent.

4. Third-party cookies

Cookies and similar technologies used on the Sites are currently first-party only. We do not currently permit third parties to set cookies through the Sites or to collect personal data through cookies or similar technologies on the Sites. The cookies we use are session cookies and are automatically deleted at the end of your browsing session.

5. How you can manage cookies

You have the right to accept or reject non-essential cookies. We provide equal prominence to accepting and rejecting cookies.

5.1. Cookies Banner

When you visit our Sites, you will see a cookie consent banner. You may: 1) Accept all cookies; 2) Reject all non-essential cookies; or 3) Customise your preferences by category. We will retain your cookie preferences for an appropriate period and will ask you to refresh them where required by applicable law or where our use of cookies materially changes.

5.2. Cookie settings on our Sites

You may update or withdraw your consent at any time by accessing Cookie settings. You may also accept, reject, or customise your preferences for non-essential cookies at any time. Withdrawing

consent does not affect the lawfulness of processing carried out before withdrawal.

5.3. Browser controls

Most browsers allow you to block or delete cookies through their settings. Please note that blocking all cookies may affect the functionality of the Sites. For guidance, please consult your browser provider's help pages.

6. International data transfers

As Sunrate operates globally, information collected through cookies may be processed by our service providers or us in jurisdictions outside the country or region where you are located. Where required by applicable laws and regulations, we will implement appropriate safeguards for such transfers. For more information about such safeguards, please see Section 5 (Sharing of the Data and International Transfer) of the Privacy Policy.

7. Changes to this Cookie Policy

We may update this Cookie Policy in the same manner as we update the Privacy Policy from time to time to reflect changes in law, technology, our Sites, or our business practices.

8. Contact us

If you have any questions about this Cookie Policy or our use of cookies and similar technologies, please contact: Sunrate Data Protection Officer via email: dpo@sunrate.com

Sunrate 隐私政策 (版本 3.2)

Sunrate 是一家全球支付和资金管理平台。我们通过先进的专有平台、广泛的全球网络和强大的 API，赋能全球企业在本地和国际范围内高效运营和持续扩张。

本隐私政策旨在说明我们在提供服务时如何收集、使用、管理、更新、展示、传输、存储、披露、共享、保护、删除或以其他方式处理（统称“处理”）个人信息，以便您继续信任 Sunrate 以公平、安全、合法的方式处理您的个人信息。

本隐私政策还阐述了您作为数据主体所享有的权利和选择，以及您就个人信息处理事宜联系我们的方式。

请确保您已阅读并充分理解本政策。

本隐私政策适用于 Sunrate 在全球范围内提供的所有服务。任何 Sunrate 实体均可代表其他 Sunrate 实体与您签订本隐私政策，所有 Sunrate 实体均将依照本隐私政策处理个人信息。

我们承诺完全遵守所有适用的个人信息法律法规要求。如强制性法律法规要求超出本隐私政策范围的处理活动，我们将相应调整我们的做法以满足相关义务。

如您对我们使用您个人信息的方式有任何疑问，可通过本隐私政策第 13 条（数据保护官）所载明的方式与我们联系。

1. 政策适用范围

1.1 本隐私政策适用于您在全球范围内使用或与 Sunrate 服务交互时，包括我们的网站、移动应用程序或其他渠道（统称“网站”）。“Sunrate 服务”和“服务”是指 Sunrate 实体提供的任何产品、服务、设备、技术、功能及应用程序，并可不时更新。本隐私政策中使用但未定义的大写术语应具有《用户协议》中赋予的含义。

1.2 根据具体情境，作为数据主体，“您”可能是企业客户、代表人、个人客户、终端用户或访客：

- 若您是我们直接提供服务的企业实体，则您为“企业客户”。

- 若您是拥有、控制或代表企业客户行事的个人（如其董事、高级职员、员工、授权签署人或最终实际控制人），则您为“代表人”。
- 若您是以个人名义直接与我们签订协议或使用 Sunrate 服务的个人（服务直接提供给您而非通过企业客户），则您为“个人客户”。
- 若您通过 Sunrate 服务与企业客户开展业务或进行交易（例如，通过使用 Sunrate 进行支付处理的企业客户进行或接收付款），但未直接与 Sunrate 签订合同或使用服务，则您为“终端用户”。
- 若您访问我们的网站或以其他方式与我们互动，但未登录 Sunrate 账户或使用我们服务，则您为“访客”。

1.3 在向我们提供其他数据主体的个人信息时，您确认已获得其同意，且其已知悉并同意我们依据本隐私政策处理其个人信息。

2. 数据控制者与数据处理者

2.1 在本隐私政策中，“我们”、“我们的”和“Sunrate”是指就您的个人信息充当“数据控制者”或“数据处理者”的 Sunrate 实体。负责处理您数据的 Sunrate 实体可能因您所在位置、与 Sunrate 签订协议的实体、您使用的产品或服务，以及 Sunrate 作为控制者还是数据处理者而有所不同。对于某些产品，Sunrate 可能同时充当数据控制者、数据处理者或两者兼具。

2.2 根据处理活动的性质及我们与您的关系，Sunrate 可能作为独立数据控制者、与第三方（如某些司法管辖区的金融机构合作伙伴或联合许可实体）的联合数据控制者，或在同一服务交互中同时充当控制者和处理者。

2.3 当 Sunrate 作为数据控制者时，其确定处理您个人信息的目的和方式，并负责确保该等处理符合适用数据保护法律，包括维护适当的技术和组织措施并履行您的数据主体权利。本政策适用于 Sunrate 作为数据控制者开展的所有处理活动。请访问我们的[监管信息](#)，了解 Sunrate 数据控制者的详细信息及联系方式。

2.4 当我们代表企业客户、合作伙伴或其他第三方控制者处理个人信息时，我们作为处理者，并依据其书面指示、适用协议及适用法律处理该等个人信息。在这些情况下，相关控制者的隐私政策（而非本政策）管辖其收集和使用终端用户及其提供给我们数据的其他个人的个人信息，该控制者仍负责提供适当的隐私通知并获取所需同意。本政策继续适用于 Sunrate 作为控制者开展的处理活动，包括服务管理、安全、合规及平台运营相关活动。

2.5 Sunrate 实体还在其运营的某些国家提供本地支持服务。这些实体可能视司法管辖区情况代表 Sunrate 担任数据处理者。Sunrate 作为数据控制者，负责确保任何此类数据处理者仅按照 Sunrate 的指示及适用数据保护法律处理个人信息。

3. 我们收集的个人信息类型

个人信息是指直接或间接识别您身份的任何信息，例如您的姓名、地址、电话号码、电子邮件地址、出生日期、支付卡信息、银行账户信息及与您身份相关的任何其他信息。本节介绍我们从您处收集的不同类型个人信息。

3.1. 您直接提供的信息

当您申请、使用或与服务互动时，您可能直接向我们提供个人信息，包括联系方式、账户和个人资料信息、身份验证信息、支付及受益人信息、与我们的通信内容，以及您在使用服务过程中选择提供的其他信息。

3.1.1. 使用 Sunrate 服务所必需的信息

为使用或与 Sunrate 服务交互，您需要向我们提供某些个人信息，包括但不限于：联系方式；创建账户资料所需的信息；身份验证信息；财务信息；及付款受益人信息。其中部分信息为法律要求，包括身份核实、反洗钱、制裁筛查、欺诈预防及相关合规目的所需的信息；部分信息为我们与您签订或履行合同及提供服务所需。若您无法或不愿提供此类信息，我们可能无法向您提供所有所请求的服务，包括无法创建或维护您的账户、完成身份验证或合规检查、处理交易或提供服务的某些功能。

3.2. 可选信息

您向我们提供的部分信息为可选且非强制性的，例如通过回应我们的调查、对我们服务的反馈、参加促销活动或竞赛，或与我们的通信提供的信息。此类信息使我们能够向您提供激励措施或附加功能，评估我们的绩效，并改善您的 Sunrate 服务体验。该附加信息将基于我们的合理判断、适用法律依据或您的同意进行处理（如适用）。

3.3. 您使用 Sunrate 服务时自动收集的信息

当您使用服务或访问我们的任何网站时，我们会自动从您处收集某些个人信息，且我们为此具有合法利益（如预防欺诈或滥用、了解您的使用情况及改进我们的服务）。这可能包括但不限于交易数据、受益人信息、卡片相关信息、使用数据、设备信息、录音、日志数据及位置信息。

3.4. 第三方提供的信息

我们还可能从第三方处收到您的个人信息，包括但不限于业务和金融合作伙伴、支付服务提供商、服务提供商、金融机构、欺诈预防合作伙伴、公开注册机构、公开可获取的来源，以及您通过其访问 Sunrate 服务的企业客户。我们可能将此类信息与直接从您处收集的个人信息相结合，用于本隐私政策所述目的。上述收集和共享行为也将在相关第三方自身的隐私政策或其向您提供的其他信息中加以说明。

3.5. 我们使用的信息技术

我们使用技术（即 Cookie、网络信标、像素、广告标签及设备标识符）来识别您、预防欺诈、保护我们的系统和网络，以及定制您的在线体验。如需了解更多关于我们可能使用的 Cookie，请参阅我们的 Cookie 政策。

4. 个人信息类别及我们的处理方式

4.1 本节提供我们从您处收集的个人信息类别的详细列表，以说明我们如何处理这些信息。

个人信息类别	具体信息	数据主体	信息来源	处理目的	法律依据
Sunrate 账户及个人资料信息	姓名、电子邮箱、电话号码、出生日期、账户凭证	代表人；个人客户	由代表人或个人客户提供	创建 Sunrate 账户、客户关系管理、服务提供	合同履行；合法利益
身份验证信息	护照、国民身份证、驾照、地址证明、验证照片	代表人；个人客户	由代表人、个人客户或验证服务提供商提供	身份核实、反洗钱合规、监管审查	法律义务；合法利益
企业实体信息	公司名称、公司注册编号、企业结构、股东信息	代表人	由代表人提供或从公开注册机构获取	商户入驻、合规检查、业务关系管理	法律义务；合同履行
交易信息	交易金额、交易日期、商户详情、付款参考	代表人；个人客户；终端用户	在支付交易过程中生成	支付处理、结算、对账、财务报告	合同履行；法律义务
支付工具信息	银行账户详情、卡片信息、账单地址	代表人；个人客户；终端用户	由代表人、个人客户或支付合作伙伴提供	支付执行、结算、交易认证	合同履行
受益人信息	收款人姓名、收款人银行	代表人；个人客户；终端用户	由代表人、个人客户提供	支付执行与结算	合同履行
设备及技术信息	IP 地址、设备标识符、浏览器类型、操作系统	代表人；个人客户；终端用户；访客	由设备或系统自动收集	欺诈检测、系统安全、服务运营	合法利益
使用及活动信息	登录记录、系统活动日志、平台使用数据	代表人；个人客户；终端用户；访客	通过使用服务生成	平台性能监控、分析及服务改进	合法利益
通信信息	电子邮件、客户支持工单、通话录音	代表人；访客；个人客户；终端用户	在与我们沟通过程中提供	客户支持、投诉处理、争议解决	合同履行；合法利益
位置信息	基于 IP 的位置、设备位置数据	代表人；个人客户；终端用户；访客	由设备自动收集	欺诈预防、安全监控	合法利益
营销信息	营销偏好、调查回复及活动参与信息	代表人；个人客户；终端用户；访客	由代表人、个人客户、访客提供	营销传播、活动管理及产品改进	同意；合法利益
Cookie 及追踪数据	网站使用追踪	代表人；个人客户；终端用户；访客	通过网站技术自动收集	功能性、分析及广告效果衡量	同意；合法利益

当我们以合法利益作为处理的法律依据时，我们已评估您的利益或基本权利和自由不凌驾于我们的利益之上。这包括为欺诈预防、金融犯罪侦测、服务安全及服务改进目的开展的处理活动。

4.2 在某些有限情况下，当适用法律法规允许时，我们可能处理特殊类别的个人信息或其他敏感个人信息。此类处理仅在提供服务所需、履行法律或监管义务所需，或在适用法律要求时获得您的明确同意的情况下进行。我们将实施适当的保障措施保护此类信息，并确保按照适用数据保护法律处理。

5. 数据共享及跨境传输

5.1 我们仅在必要时与第三方或关联方共享您的个人信息。如您希望进一步了解我们可能向其传输个人信息的第三方、所在司法管辖区，或跨境传输所采取的保障措施和合同安排，您可通过 dpo@sunrate.com 与我们联系。

接收方	共享原因	备注
Sunrate 实体	为便利或支持服务提供，我们可能将您的个人信息披露给 Sunrate 集团其他成员，用于运营支持、客户支持、技术服务、服务改进、欺诈预防、合规及相关内部业务目的。	所有 Sunrate 实体仅按照适用的集团内部数据共享安排及本隐私政策所载明的目的处理个人信息。
银行、金融机构及第三方支付服务提供商	在处理、路由、清算或结算交易、提供账户相关服务或支持您所请求的支付服务所必要时，我们可能共享您的个人信息。	这可能包括付款指令或相关交易记录中所含的个人信息，范围仅限相关支付流程所需。该等接收方可能作为独立控制者或依据其自身监管义务处理相关数据。
第三方平台及集成合作伙伴	在使用 Sunrate 服务代码、便利资金收取、支持平台集成或实现相关合作伙伴功能所必要时，我们可能共享个人信息。	共享范围仅限于相关集成或平台功能合理必要的个人信息。这些合作伙伴须依据适用个人信息保护法律及任何适用合同限制处理个人信息。
第三方服务提供商 (含反洗钱、身份验证、制裁筛查及合规服务提供商)	我们可能与协助我们开展欺诈预防、身份核实、制裁筛查、反洗钱、反恐融资、合规监控、调查及相关风险管理活动的服务提供商共享个人信息。	这些提供商仅在履行我们所要求服务所必要的范围内处理个人信息，并受适当的合同及安全义务约束。
第三方服务提供商 (含技术、安全及云基础设施提供商)	在托管、支持、保障、维护或改进我们的服务及相关系统所必要时，我们可能与技术服务提供商共享个人信息。	这些提供商依据适当的合同安排参与合作，除适用法律允许外，不得将个人信息用于其自身目的。
政府机构、监管机构、执法机关、司法	在适用法律要求或允许时，包括为履行法律或监管义务、回应合法请求、法院命令、传票或监管查询，以及预防、侦测或调查违	任何此类披露均仅在适用法律要求或允许的范围内依据我们的内部程

接收方	共享原因	备注
机关或其他主管机关	法活动或安全威胁，我们可能披露个人信息。	序进行。在某些情况下，我们可能被禁止通知您相关披露。
授权用户	当代表人或个人客户授权其他用户访问或管理 Sunrate 服务，或当用户通过 Sunrate 服务进行支付或收款时，为运营 Sunrate 账户或完成相关交易所必要，某些个人信息可能对授权用户可见。	可见范围仅限于相关账户管理或交易活动合理必要的个人信息。
专业顾问、审计师及企业交易对手方	我们可能向我们的专业顾问、审计师、保险人、融资对手方，或与审计、融资、重组、合并、收购、处置或其他企业交易相关的潜在买方、卖方、投资者或其他对手方披露个人信息。	任何此类披露均受适当的保密保护约束，并依据适用个人信息保护法律执行。法律要求时，将通知受影响的个人。

5.2 Sunrate 的部分服务可能由位于其他司法管辖区的关联方、人员或第三方（如中间行或受益人银行）提供。因此，为向您提供服务，我们可能需要将您的个人信息传输至您所在国家或地区以外的国家或地区：

- 由于我们在全球范围内运营，您的个人信息也可能在 Sunrate 实体或我们的服务提供商所在的其他司法管辖区内处理。
- 向其他国家或地区传输个人信息时，我们将实施适当的保障措施，确保遵守此类传输所适用的法律法规。特别是，当目的地国家或地区的法律法规提供的保护水平低于您所在国家或地区时，我们将采取适当措施，确保您的个人信息得到充分保护并依据本隐私政策处理。
- 在适用法律法规要求使用特定机制进行个人信息传输时，我们将实施适当措施，包括：将个人信息传输至依据适用法律法规被认定为提供充分保护水平的国家或接收方；与相关接收方签订标准合同条款（SCC）、国际数据传输协议（IDTA）或相关机构发布的同等标准合同；或使用适用法律法规允许的其他合法传输机制。

您可通过 dpo@sunrate.com 联系我们，请求了解适用于您个人信息跨境传输的保障措施，包括在适当情况下，在适用法律和保密限制的前提下，获取相关传输机制的副本或摘要。

在个人信息传输至其他司法管辖区无法依据充分性决定、标准合同条款或其他适用法律法规认可的传输机制的有限情况下，在法律允许时，我们可能依据您的明确同意进行此类传输。在此情况下，我们将告知您因目的地司法管辖区缺乏充分数据保护水平而与传输相关的潜在风险。

5.3 在适用法律法规允许的范围内，您确认并同意，我们与之共享您个人信息的第三方，以及该等第三方进一步共享信息的后续接收方，可能依据本隐私政策处理个人信息。

6. 数据存储

6.1 存储地点、目的及期限

我们主要将您的个人信息存储在香港和新加坡。我们仅在实现收集目的所必要的期限内存储您的个人信息。

某些信息，包括但不限于监管相关信息（如反洗钱和反恐融资目的所需的信息），将依据适用监管要求存储不少于十（10）年，除非适用法律法规要求更长的存储期限。

对于其他类别的个人信息，存储期限将根据个人信息的性质及收集目的确定，并考虑适用的法律法规要求。

6.2 删除与处置

当适用法律法规或我们运营所在的司法管辖区不再要求存储相关个人信息，或当您撤回同意且我们没有其他法律依据继续处理此类数据时，我们将删除或以其他方式处置该等信息。这些流程可能自动执行，您无需联系我们请求删除。

6.3 删除与处置方法

删除或处置将以确保个人信息永久不可恢复的方式进行，可能包括物理销毁存储介质、永久清除或安全覆写电子记录、匿名化或假名化处理使重新识别不再合理可行，或其他适用法律法规认可的方法。若由第三方服务提供商执行删除，我们将确保签订适当的合同义务，以核实数据已按照我们的指示安全删除。

6.4 删除的例外

即使在您停止使用我们的服务或请求删除您的个人信息后，我们仍可能存储您的个人信息。此类情况包括：

- 处理在相关 Sunrate 账户关闭或停用前发起的交易。
- 遵守适用的反洗钱要求及其他适用法律法规。
- 侦测、预防或调查欺诈及其他损失预防事项。
- 遵守法律程序、法院命令或执法机关的要求。
- 追偿您欠我们的任何费用或其他款项。
- 履行我们的税务、会计、财务及监管报告义务。
- 在必要时履行我们对第三方合作伙伴的合同义务。
- 解决争议或确立、行使或执行我们在相关服务协议或其他适用协议或政策下的权利。
- 采取任何其他行动或行使适用法律允许或要求的任何其他权利。

当我们基于上述一项或多项例外情形在删除请求后存储您的个人信息时，我们将把对该等数据的处理限制在适用目的所必要的范围内，不将其用于任何其他目的。

7. 您的权利与选择

根据适用个人信息保护法律，您可能就您的个人信息享有某些权利。这些权利的适用范围可能因您所在司法管辖区的适用法律而有所不同。请参阅附录一（国家/地区特定条款）了解适用于您所在国家或地区的具体隐私权利。

如果您不直接使用 Sunrate 服务，您可通过直接联系我们 dpo@sunrate.com 行使您的数据主体权利，我们将依据适用法律法规予以回应。

7.1 访问与更正

您可能有权请求访问我们持有的关于您的个人信息，并请求更正或更新不准确或不完整的个人信息。我们可能需要在回应此类请求前核实您的身份。在某些情况下，适用法律可能允许或要求我们拒绝或限制对个人信息的访问，例如提供访问权将对其他人的权利产生不利影响，或信息受法律特权或其他法律限制约束。

7.2 删除

在某些情况下，您可能有权请求我们删除或移除我们持有的关于您的个人信息。但是，此权利可能受到某些法律限制。例如，在遵守法律或监管义务、解决争议、执行协议或其他适用法律允许的合法业务目的所需时，我们可能存储个人信息。

7.3 限制处理

在某些情况下，您可能有权请求我们限制对您个人信息的处理。我们还将根据您的请求通知我们已向其披露相关个人信息的任何第三方停止处理。在处理受限时，我们可能存储您的个人信息，但除非适用法律允许或获得您的同意，否则不会对其进行其他处理。如果我们打算在限制解除后恢复处理您的个人信息，我们将提前通知您，并在适用法律要求时在执行前获得您的同意。

7.4 数据可携带

在适用法律规定的情况下，您可能有权以结构化、常用、机器可读的格式接收您向我们提供的某些个人信息，并在技术可行时（有某些例外情况）请求将该等信息传输至另一服务提供商。这包括我们基于您的同意或为履行与您的合同所必要而处理的任何个人信息，例如与交易相关的数据。如您有请求，我们将向您提供更多详细信息。

7.5 反对

在适用法律允许的情况下，当数据处理基于合法利益或公共利益任务时，您可能有权反对我们处理您的个人信息。

7.6 撤回同意

当我们依赖您的同意处理您的个人信息时，您可随时撤回您的同意。撤回同意不影响撤回前基于同意进行的处理的合法性。撤回同意后，我们将尽快停止为相关目的处理您的个人信息。在我们不再有法律依据存储该等数据时，我们将依据本隐私政策第 6 条（数据存储）所述的删除方法删除或处置相关数据。

7.7 行使您的权利

如您希望行使上述任何权利，请通过 dpo@sunrate.com 与我们联系。在处理您的请求前，我们可能要求您提供额外信息以核实您的身份。在适用数据保护法律允许的情况下，如果您认为我们处理您个人信息的方式违反适用法律，您也有权向主管数据保护机构或监管机构提出投诉。

8. 隐私政策的适用与更新

8.1 本隐私政策（包括其正文及附录）、Sunrate 网站上的内容、交易查询、交易收据，以及相关服务协议中包含的信息处理条款，共同构成 Sunrate 与您之间关于信息处理的完整协议。

8.2 为反映适用法律法规的变化、您使用 Sunrate 服务方式的变化，或我们处理个人信息方式的变化，我们可能不时修订本隐私政策，并在适当情况下通知您。

9. 安全

9.1 我们实施并维护适当的技术、物理和程序性保障措施，旨在保护您的个人信息免遭丢失、滥用及未经授权访问、披露或更改。这些保障措施包括积极维护的防火墙、最新的防病毒软件、加密协议，以及对服务器的物理访问限制控制等措施。

9.2 发生个人信息泄漏事件时，我们将采取迅速措施遏制并补救此类泄露。在适用法律法规要求的情况下，我们将在适用法律规定的时限内通知相关监管机构，并在泄漏可能对您的权利和利益造成高风险时通知受影响的个人。我们还将依据法律义务维护所有个人信息泄露事件的内部记录。就本隐私政策而言，个人信息泄露是指导致我们传输、存储或以其他方式处理的个人信息被意外或非法销毁、丢失、更改、未经授权披露或访问的安全事件。

10. 营销

在适用法律法规允许的情况下，我们可能向您发送关于我们产品、服务或优惠的营销或促销通信。在适用法律要求时，我们将在此前获得您的同意。您可随时按照通信中的退订说明或通过本隐私政策提供的联系方式联系我们，撤回您的同意或选择退出。在未获得您同意的情况下，我们不会将您的个人信息共享给第三方用于其自身的营销目的。

11. 未成年人隐私

11.1 当我们收集、使用或披露与未成年人相关的个人信息时，我们将依据适用法律执行，并在必要时获得该未成年人的父母、监护人或具有法定监护权人员的同意。

11.2 如果我们发现已在未获得所需同意或其他有效法律依据的情况下收集了与未成年人相关的个人信息，我们将依据适用法律采取适当措施，包括获取所需同意或在适当情况下删除该等个人信息。

12. 自动化决策与人工智能

我们可能在有限情况下使用自动化决策和画像，包括在入驻或交易处理过程中进行欺诈筛查、制裁筛查和风险评分，使用您的身份信息、交易模式和第三方数据等输入数据。当我们为此目的使用您的个人信息（包括画像）且对您产生法律效力或类似重大影响时，我们将在适用法律要求时获取您的明确同意。此类处理可能导致的后果包括延迟、要求额外核实或账户访问限制。除非适用法律允许且具备适当保障措施，否则我们不会单纯依赖自动化决策产生法律效力或类似重大影响。在法律要求时，您有权请求人工审核并通过联系 dpo@sunrate.com 对任何此类决策提出异议。

我们还可能在我们的服务中使用人工智能工具和其他自动化技术，包括用于搜索和检索功能、客户支持、运营支持、合规及服务改进。这些工具可能协助用户或我们的人员访问信息、生成摘要或支持工作流程，但不一定涉及对个人的自动化决策。我们对人工智能工具的使用实施适当的内部治理和人工监督，以帮助确保

此类使用符合适用法律和本隐私政策。在适用法律要求时，您可能有权了解人工智能工具如何影响您个人信息的处理，并通过联系 dpo@sunrate.com 寻求对任何对您产生重大影响的输出结果的人工审核。

13. 数据保护官

我们已任命数据保护官（“DPO”）负责监督与本隐私政策相关的事务。如您对本隐私政策有任何疑问，包括行使您的法定权利的任何请求，请使用以下联系方式联系 DPO：

Sunrate 数据保护官

电子邮件：dpo@sunrate.com

修订日期：2026 年 7 月 3 日

生效日期：2026 年 7 月 3 日

附录一 国家/地区特定条款

新加坡

访问与更正

在新加坡《2012 年个人信息保护法》（“PDPA”）适用的情况下，您可请求访问我们持有或控制的您的个人信息，以及在过去十二（12）个月内我们使用或披露您个人信息的方式信息，但须符合适用法律规定的例外情形。您也可请求更正您的个人信息。依据 PDPA，若您的个人信息被更正，除非您同意无需向相关组织发送已更正的个人信息，或存在例外情形，否则我们将向过去一年内我们向其披露过该个人信息的其他组织发送已更正的个人信息。

撤回同意

当我们依赖您的同意时，您可在合理通知期内撤回该同意。收到您的撤回请求后，我们将告知您撤回同意的可能后果，并停止为相关目的收集、使用或披露您的个人信息，除非法律另有允许或要求。

联系与投诉

如有与 PDPA 相关的问题或请求，请通过 dpo@sunrate.com 联系我们的数据保护官。如您对我们处理您个人信息的方式有顾虑，请先联系我们的数据保护官。若对我们的回应不满意，您有权向新加坡个人信息保护委员会提出投诉。

数据泄露通知

除我们的一般泄露通知惯例外，在 PDPA 要求的情况下，我们将在作出泄露属于须通报的泄露的评估后三

(3) 个日历日内通知个人信息保护委员会，并尽快通知受影响的个人。

香港

数据访问请求

我们将在《个人资料（私隐）条例》（第 486 章）（“私隐条例”）要求的时限内（一般为四十（40）日内）回应数据访问请求。在私隐条例允许的情况下，我们可能就处理数据访问请求收取适用费用。

数据更正

您可请求更正您认为不准确的个人信息。若我们确认个人信息不准确，我们将在适用法律要求的时限内（一般为四十（40）日内）作出必要更正。若我们无法遵从请求，我们将在同一期限内告知您原因，并在切实可行后尽快遵从。

联系与投诉

如您对我们在香港处理您个人信息的方式有任何疑问或顾虑，可通过 dpo@sunrate.com 联系我们。您也有权向香港个人资料私隐专员公署（PCPD）提出投诉。

英国

自动化决策

我们可能在欺诈预防、反洗钱、制裁筛查和身份核实方面使用自动化系统和画像工具。在英国数据保护法下，若对您作出的决定完全由自动化方式作出，无需人工参与，且产生法律效力或类似重大影响，您可能有权获得人工干预、表达您的观点并对该决定提出异议。

跨境数据传输

当我们将您的个人信息传输至英国以外时，我们将依据适用的英国数据保护法律执行。此类传输将受适当保障措施约束，包括依据英国 GDPR 作出的充分性法规、使用国际数据传输协议或欧盟标准合同条款的英国附录，或其他适用英国数据保护法律认可的传输机制。

联系与投诉

如您对我们在英国处理您个人信息的方式有任何疑问或顾虑，请通过 dpo@sunrate.com 联系我们。您也有权通过 www.ico.org.uk 向信息专员办公室提出投诉。

马来西亚

访问与更正权利

依据《2010年马来西亚个人信息保护法》（“马来西亚 PDPA”），在法律允许的情况下，我们可就回应数据访问请求收取适用费用。为保护您的隐私和安全，在处理访问或更正请求前，我们可能要求合理必要的信息以核实您的身份并（在适用时）定位所请求的个人信息。

敏感个人信息

我们仅在获得您明确同意，或在适用法律（包括法律认可的有限情形）另行允许的情况下处理敏感个人信息。在适用时，我们为此类数据的处理实施额外保障措施。

马来西亚 PDPA 项下的权利

除本隐私政策所载明的权利外，当处理正在或可能对您或他人造成实质性且无正当理由的损害或困扰时，您可能还有权要求我们停止或不开始处理您的个人信息。

联系与投诉

如有与马来西亚 PDPA 相关的问题或请求，请通过 dpo@sunrate.com 联系我们的数据保护官。如对我们的回应不满意，您可向个人信息保护局（Jabatan Perlindungan Data Peribadi, www.pdp.gov.my）提出投诉。

中国大陆

处理个人信息的法律依据

我们遵守《中华人民共和国个人信息保护法》的规定，除取得您的明确同意以外，仅依照以下情形处理您的个人信息：1) 订立、履行您作为一方当事人的合同所必需；2) 为履行法定职责或法定义务所必需；3) 为应对突发公共卫生事件，或者在紧急情况下为保护自然人的生命健康和财产安全所必需；4) 为公共利益实

施新闻报道、舆论监督等行为，在合理的范围内处理个人信息；5) 根据法律规定在合理的范围内处理您自行公开或者其他已经合法公开的个人信息；或 6) 法律法规规定的其他情形。

敏感个人信息

敏感个人信息是指一旦泄露或者非法使用，容易导致自然人尊严受到侵害或者人身、财产安全受到危害的个人信息，包括生物识别、宗教信仰、特定身份、医疗健康、金融账户、行踪轨迹等信息，以及不满十四周岁的未成年人个人信息。为向您提供服务、保护您的账户及交易安全、落实法定义务或监管要求等，我们需要收集您的相关敏感个人信息。我们将在具体业务场景中通过页面提示、弹窗、勾选、签署确认或其他适当方式，另行取得处理您的单独同意。若您拒绝提供，可能无法使用相关服务，但不影响您使用 Sunrate 提供的其他服务。

《个人信息保护法》下的个人权利

除本隐私政策所载明的权利外，您对您的个人信息的处理享有知情权、决定权，有权限制或拒绝我们对您的个人信息进行处理，除非法律另有规定。在法律允许的范围内，您可以向我们提出查阅、复制您的个人信息，我们会根据您的要求提供相应的副本或拷贝。若您要求更改或补充您的个人信息，我们将予以核实并进行更正和补充。若您发现我们违反法律、行政法规或违反约定处理您的个人信息，您有权要求我们删除您的个人信息。

个人信息的存储与跨境传输

您的个人信息原则上将存储在中国大陆境内。为了在全球范围内向您提供服务，在中国相关法律法规允许的范围内，并在取得您单独同意的前提下，您的个人信息可能被传输至中国境外的 Sunrate 实体。我们将采取合理且必要的措施（包括但不限于加密传输、限制访问权限以及与境外接收方签订数据保护协议以明确双方的数据保护责任等），确保您的个人信息在境外接收和处理过程中获得不低于中华人民共和国境内法律法规要求的保护水平。

联系与投诉

如您对我们在中国大陆地区处理您个人信息的方式有任何疑问或顾虑，或您想让我们进一步解释说明对您的个人信息进行处理的相关规则，可通过 dpo@sunrate.com 联系我们。您也有权向国家网信部门提出投诉。

附录二 Cookie 政策

1. 简介

本 Cookie 政策说明 Sunrate (“Sunrate”、“我们”或“我们的”) 如何在我们的网站、移动应用程序及其他链接至本 Cookie 政策的数字渠道 (统称“网站”) 上使用 Cookie。请将本 Cookie 政策与我们的隐私政策一同阅读, 隐私政策说明了如何收集、使用、披露及以其他方式处理个人信息, 您就个人信息享有的权利, 以及您联系我们的方式。在适用法律法规要求的情况下, 我们将在您设备上放置非必要 Cookie 或类似技术前获取您的同意。您可通过相关网站上提供的 Cookie 横幅或 Cookie 设置管理您的偏好。当 Cookie 涉及个人信息的处理时, 您可能在适用数据保护法律下享有相应权利。如需了解更多关于您的权利及如何行使的信息, 请参阅我们的隐私政策或联系我们的数据保护官。

2. 什么是 Cookie?

Cookie 是当您访问网站时放置在您的浏览器、计算机、移动设备或其他设备上的小型文本文件。Cookie 使网站能够识别您的设备并存储关于您的偏好或过往行为的某些信息。我们还可能在适用时使用类似技术, 如网络信标、像素、标签、SDK、脚本、本地存储及会话回放或分析工具。为便于参考, 除上下文另有要求外, 我们在本 Cookie 政策中将所有此类技术统称为“Cookie”。

Cookie 可能分为:

- 第一方 Cookie: 由 Sunrate 直接设置; 或
- 第三方 Cookie: 由向我们提供服务或在网站上启用某些功能的第三方设置。

Cookie 在您设备上的存储时间也有所不同:

- 会话 Cookie: 在您关闭浏览器时过期;
- 持久性 Cookie: 在过期或被删除前持续存储在您的设备上。在适用法律要求的情况下, 持久性 Cookie 的存储时间不会超过其所述目的所必要的期限。

3. 我们使用的 Cookie 类别

3.1. 必要 Cookie

这些 Cookie 对网站运营及向您提供所请求的服务是严格必要的。它们可能包括用于维护网络和信息安全、用户身份验证及防止欺诈或未授权访问、启用核心网站功能、支持会话管理和负载均衡、记忆隐私设置或 Cookie 偏好的 Cookie。必要 Cookie 始终处于激活状态，因为没有它们，网站或所请求的服务可能无法正常运行。在适用法律允许的情况下，这些 Cookie 无需您的同意。

3.2. 功能性 Cookie

这些 Cookie 并非严格必要。在法律要求时，我们将在将这些 Cookie 放置到您的设备前征求您的同意。若您不同意或随后撤回同意，某些个性化功能可能无法正常运行。这些 Cookie 使网站能够记住您所做的选择，并提供增强的个性化功能，例如语言偏好、国家或地区选择、登录状态、用户界面偏好。若您关闭这些 Cookie，某些功能或个性化可能无法正常运行。

3.3. 分析 Cookie

这些 Cookie 帮助我们了解网站的使用情况，包括哪些页面被访问、用户如何导航、会话持续多长时间以及是否出现技术问题。我们使用这些信息来改进网站、服务及用户体验。根据网站上部署的工具，分析 Cookie 可能由第三方分析提供商或我们提供。在适用法律法规要求时，除非适用法律规定例外情形，否则我们将仅在获得您同意的情况下使用分析 Cookie。

3.4. 广告与营销 Cookie

这些 Cookie 可能用于记录您对网站的访问、您查看的页面及您点击的链接；投放与您兴趣更相关的广告；衡量广告活动的效果；帮助我们了解营销通信或广告的效果；通过第三方广告平台支持再营销。这些 Cookie 可能由我们或第三方广告、社交媒体或分析合作伙伴设置。在适用法律法规要求时，我们将仅在获得您同意的情况下使用这些 Cookie。

4. 第三方 Cookie

网站上使用的 Cookie 和类似技术目前仅为第一方。我们目前不允许第三方通过网站设置 Cookie 或通过网站上的 Cookie 或类似技术收集个人信息。我们使用的 Cookie 均为会话 Cookie，将在您的浏览会话结束时自动删除。

5. 您如何管理 Cookie

您有权接受或拒绝非必要 Cookie。我们对接受和拒绝 Cookie 提供同等显著的选项。

5.1. Cookie 横幅

当您访问我们的网站时，您将看到 Cookie 同意横幅。您可以：1) 接受所有 Cookie；2) 拒绝所有非必要 Cookie；或 3) 按类别自定义您的偏好。我们将在适当期限内存储您的 Cookie 偏好，并在适用法律要求或我们对 Cookie 的使用发生实质性变化时要求您更新偏好。

5.2. 我们网站上的 Cookie 设置

您可随时通过访问 Cookie 设置来更新或撤回您的同意。您也可随时接受、拒绝或自定义您对非必要 Cookie 的偏好。撤回同意不影响撤回前处理的合法性。

5.3. 浏览器控制

大多数浏览器允许您通过其设置阻止或删除 Cookie。请注意，阻止所有 Cookie 可能影响网站的功能。如需指导，请参阅您的浏览器提供商的帮助页面。

6. 跨境数据传输

由于 Sunrate 在全球范围内运营，通过 Cookie 收集的信息可能由我们的服务提供商或我们在您所在国家或地区以外的司法管辖区处理。在适用法律法规要求时，我们将为此类传输实施适当的保障措施。如需了解更多此类保障措施的信息，请参阅隐私政策第 5 条（数据共享及跨境传输）。

7. 本 Cookie 政策的变更

我们可能以与更新隐私政策相同的方式不时更新本 Cookie 政策，以反映法律、技术、我们网站或业务实践的变化。

8. 联系我们

如您对本 Cookie 政策或我们使用 Cookie 及类似技术有任何疑问，请联系：

Sunrate 数据保护官

电子邮件：dpo@sunrate.com