

BLOCK TREE PRIVACY POLICY

1. INTRODUCTION

Block Tree Ltd (referred to as “**Block Tree**”, “**we**” “**us**” or “**our**”) is committed to protecting the privacy, confidentiality, and security of personal data in our possession or under our control. We operate in strict compliance with the requirements of applicable personal data protection laws including the Personal Data Protection Act 2010 of Malaysia (“**PDPA 2010**”) and the Personal Data Protection (Amendment) Act 2024 (“**PDPA 2024**”) (collectively, the “**Acts**”), in relation to the collection, use, disclosure and processing of personal data.

This Privacy Policy explains, amongst others:

- the types of your personal data that we collect and the manner on how we collect the same;
- the manner on how the personal data is used;
- the parties to whom we disclose your personal data;
- the manner on how we secure and retain your personal data; and
- your rights in relation to personal data, including the right to request access to and correction of your personal data,

and provides the terms and conditions in respect of the same. If you do not agree to or are not satisfied with any of the terms or conditions of this Privacy Policy, please discontinue from accessing or using Block Tree’s website(s), application(s) and other electronic platforms (collectively, “**Platform**”) as well as our products and services immediately. By accessing or using the Block Tree’s Platform and our products and services, you shall be deemed to have agreed to the terms and conditions of this Privacy Policy and you consent to the collection, use and disclosure of your personal data collected by us via the Block Tree’s Platform, products or services in the manner as set out in this Private Policy.

2. TYPES OF PERSONAL DATA WE COLLECT

You may be asked, may have supplied and may continue from time to time, provide your personal data to Block Tree for the purpose of its business operations. Personal data includes any information that relates to an individual who can be identified from that information and/or other information in our possession.

Personal data we may collect including but not limited to the following:

- personal particulars, such as name, date of birth, nationality, identity card/passport details, residential address, contact details, and/or education details;
- biometric information;
- employment details, such as occupation, directorships and other positions held, employment history, salary, and/or benefits;
- tax information;
- information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- financial information, such as financial institution account numbers, transaction history, source of funds and/or source of wealth;
- digital wallet information;
- information relating to your activities, preferences and interests arising from your use of Block Tree’s products and services; and
- personal information provided by job applicants and obtained in relation to background checks and reference verifications on job applicants.

3. SOURCES OF PERSONAL DATA

Block Tree may from time to time collect personal data either directly from you or from various other sources, including but not limited to the following:

- when you apply for, subscribe to or register for any of Block Tree’s products and services;

- through your communications with us and/or our authorised agents, whether via written correspondence, e-mail, phone or video call;
- from public domains, credit reporting agencies, intermediaries, government department or agencies, public registries, social media and publications;
- from third parties or other sources in respect of which you have provided your consent for the disclosure of your personal data, or where such disclosure is otherwise permitted under the Acts; or
- from information that is supplied and/or collected when you visit Block Tree's Platform. This may include but not limited to your mobile device or computer's IP address, geolocation data, device identifiers and online behavioural data, in compliance with applicable statutory notice requirements.

4. PURPOSE OF THE USE OF PERSONAL DATA

A. Business Purposes

Block Tree may use and process your personal data for our business purposes, including but not limited to:

- processing your applications, subscriptions and registrations for Block Tree's products and services;
- conducting Know-Your-Customer (KYC) checks and managing anti-money laundering, counter-terrorism, sanction screening and fraud risks;
- administering your accounts and providing you with Block Tree's products and services;
- managing our infrastructure, business operations and complying with internal policies and procedures;
- registering you for investor-related events, activities and materials;
- designing, installing and using software applications obtained from relevant application stores;
- responding to and processing your enquiries, and taking further actions or follow-ups as required;
- marketing and promoting existing and future Block Tree's products or services;
- providing you with online services available at Block Tree's Platform, applications and/or through other telecommunication channels;
- using information collected through Block Tree's Platform to improve your experience while using our services;
- compiling general statistics in relation to the number of visitors to, and usage of Block Tree's services;
- conducting research, survey and/or analysis to better understand your needs, preferences, interests, experiences and/or habits;
- using your personal data for analytics purposes;
- designing new and/or enhancing existing services, products and activities relating to Block Tree's products or services;
- assessing job applicants for potential employment, verifying information provided in job applications, and communicating regarding the recruitment process; and
- for other purposes directly relating to any of the above.

B. Direct Marketing Purposes

Block Tree may use your personal data to provide recommendations to you on, products, services or other marketing or promotional materials. These communications may be delivered to you through various modes including but not limited to electronic mail, direct mail, short message service, telephone calls, facsimile and other mobile messaging services.

You may opt-out of receiving marketing communications at any time by following the instructions provided in the marketing communications. To learn more on how you can change the way we use your personal data for marketing purposes, please contact us at the email provided in this Privacy Policy.

5. DISCLOSURE OF PERSONAL DATA

Block Tree may retain, process and/or disclose your personal data for the purposes specified in this Privacy Policy to third parties, including to:

- any person to comply with a court order, subpoena or other legal process (whether in or outside Malaysia);
- any person to comply with applicable laws and regulations, including those applicable to our agents, brokers and other third-party service providers;
- any member of Block Tree group (being Block Tree and its affiliates);
- any person to comply with a request by a government authority, law enforcement agency or similar body (whether in or outside Malaysia);
- prospective purchasers to whom Block Tree's businesses or any part of Block Tree's businesses will be sold, assigned or transferred to, if applicable;
- any agents, contractors or other third-party service providers who provide administrative, human resource and employment, onboarding, legal, financial, management, operational, market surveillance, telecommunications, computer, payment, debt collection, data processing, data storage, data analytics or other services;
- any person to enforce any agreement with you, or to protect our rights, property or safety, or the rights, property or safety of our employees; or
- other third parties as notified at, and in accordance with additional privacy notice as provided at the time of collection.

6. COOKIES USAGE

Please refer to Cookies Policy in <https://blocktree.co/legal> for more information

7. SECURITY OF PERSONAL DATA

All personal data provided to Block Tree will be securely stored, with access strictly limited to authorised personnel. We implement appropriate security procedures and technologies to prevent unauthorised access, misuse or unlawful disclosure of personal data and to ensure its secure transfer.

In instances where Block Tree engages external data processors to act on its behalf, we will take contractual or other reasonable measures to ensure that any personal data transferred to such external data processors is adequately protected against unauthorised access, misuse or unlawful disclosure.

8. RETENTION OF PERSONAL DATA

Your personal data will be retained only for as long as necessary to fulfil the purposes for which it was collected, and will not be retained for longer than necessary, unless a longer retention period is required or permitted by applicable laws, rules and regulations. We will take all reasonable steps to ensure that all personal data is destroyed or permanently deleted when it is no longer required for the purposes for which it was to be processed.

Personal data of unsuccessful job applicants may be retained by Block Tree for a reasonable period in accordance with applicable laws for consideration for future job opportunities, unless the applicant requests that Block Tree does not retain their information.

9. DATA INTEGRITY

Block Tree will take reasonable steps to ensure that your personal data is accurate and up to date. If we become aware that any personal data is inaccurate, incomplete or misleading, we will take all reasonable steps to avoid using such data and will notify any third parties to whom the personal data has been disclosed.

10. INTERNATIONAL TRANSFER OF PERSONAL DATA

For the purposes specified in this Privacy Policy, Block Tree and its third-party service providers may transfer, store and process your personal data to or in a place outside Malaysia, subject always to compliance with applicable personal data protection laws, including the Acts.

11. ACCESS AND CORRECTION OF PERSONAL DATA

You may, to the extent as permitted by the Acts:

- (a) request access to and obtain a copy of the personal data relating to you that is being processed by Block Tree;
- (b) request transmission of personal data in a machine readable format, provided it is technically feasible and the formats are compatible; or
- (c) request that any personal data provided by you be corrected if it is inaccurate, incomplete, misleading, or not up to date.

Any request for access to or correction of personal data held by us should be made in writing and sent to our Data Protection Officer by email at dpo@blocktree.co. Subject to the payment of the prescribed fee and to the extent permitted by applicable laws, we will make reasonable efforts to process your request within twenty-one (21) days from the date of receipt.

12. CONSENT

By providing your personal data to Block Tree, you consent to our collection, use, and processing of your personal data in accordance with this Privacy Policy.

If you are a corporation providing personal data of third parties, including but not limited to directors, shareholders, employees, authorised signatories, agents or representatives, you represent and warrant that you have obtained all necessary consent from such third parties and that they have been informed of the purposes for which their personal data is disclosed.

13. WITHDRAWING CONSENT

You have the right to withdraw your consent to the processing of your personal data at any time by sending a written notice to our Data Protection Officer at the email provided in this Privacy Policy. Your written notice should include your name, contact information, and a detailed explanation of your request.

Upon receiving your written notice, we will cease processing your personal data unless the continued processing is necessary to protect your vital interests or those of another person. We will confirm receipt of your notice and inform you of any ensuing implications. Please note that your withdrawal of consent may result in certain products and services no longer being available to you.

14. CONSEQUENCES OF LIMITING DATA OR WITHDRAWING CONSENT

The provision of your personal data is mandatory for us to process your request or provide you with our products or services. Such personal data may include personal data relating to persons appointed or authorised by you to act on your behalf.

In the event the personal data you provide is incomplete or unsatisfactory, or if you limit the way the personal data is to be processed, or if you withdraw your consent, we may not be able to provide the requested information, products or services, or to process your requests, applications, subscriptions or registrations. In the case of job applications, failure to provide the required information may prevent Block Tree from processing your application.

15. INQUIRIES OR COMPLAINTS

Should you have any questions or requests, or complaints in respect of your personal data, please contact Block Tree's Data Protection Officer at dpo@blocktree.co.

16. AMENDMENTS TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in how we use your personal data or to comply with applicable laws and regulations. The latest version will be made available on our Platform, and all communications, transactions and dealings with us shall be governed by the version in effect at the time.

Effective Date: 6 April 2026