

Vistra Corporate Entity Management Portal Privacy Policy

Please read the following to learn more about how we collect, store, use and disclose information about you when you interact or use the Vistra Corporate Entity Management Portal (“**Portal**”) in any manner.

This Privacy Policy covers our treatment of information that we gather when you are accessing or using the Portal, or when you contact us in any manner. We gather various types of information, including information that identifies you as an individual (“**Personal Data**”) from our users, as explained in more detail below.

It is important that the Personal Data we hold about you is accurate, current and complete. Please keep us informed if your Personal Data changes during your relationship with us.

What information we collect

1. *Information You Provide Us:* We receive and store information you provide directly to us on the Portal. For example, when setting up or logging in to a user account, or when you upload or submit information on the Portal, we collect Personal Data about you and of other persons whose information you may provide, such as: yours or their name, username, email address, job title, mailing address, contact numbers, identity details, profile information, relationship with your company, and employment details.
2. *Information We Automatically Collect:* When you access or use the Portal, we may, including through third-party service providers such as Google Analytics, collect certain information related to your device, such as your device’s IP address, referring website, what pages your device visited, and the time that your device visited our website, as well as the following:
 - Usage information: We keep track of user activity of our customers and their users, the configuration of their computers, and performance metrics related to their use of the Portal.
 - Log information: We log information about our customers and their users when you use the Portal including IP address.
 - Information collected by cookies and other similar technologies: We use various technologies to collect information which may include cookies on users’ computers.
3. *Other Information:* We also collect, use, and share Aggregated Data such as statistical or demographic data for any purpose. “**Aggregated Data**” may be derived from your personal data but is not considered personal data in law as this data does not directly nor indirectly identify an individual. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific Portal feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Policy.
4. We do not collect any details about your ethnicity, religious beliefs, sexual orientation, political opinions, or information about your health, genetic or biometric data.

How we use the information

5. We may use the information we collect:
 - To administer our websites, and for internal operations, including troubleshooting, risk management, data analysis, testing, statistical and survey purposes;
 - To improve our Portal and to ensure that its content and features are presented in the most effective manner for our customers and prospective customers;
 - To analyse our customers’ use of the Portal for trend monitoring, relationship management, marketing, and advertising purposes;
 - For purposes made clear to you at the time you submit your information – for example, to fulfill your request for a demo, or to provide you with information you have requested about our products; and
 - As part of our efforts to keep our websites and/or Portal safe and secure.

6. We may use the information we collect from our customers and their users in connection with the Portal we provide for a range of reasons, including to:
 - To set up a user account,
 - Provide, operate, and maintain the Portal;
 - Process and complete transactions, and send related information, including transaction confirmations and invoices;
 - Manage our customers' use of the Portal, respond to enquiries and comments, and provide customer service and support;
 - Send customers technical alerts, updates, security notifications, and administrative communications;
 - Investigate and prevent fraudulent activities, unauthorized access to the Portal, and other illegal activities; and
 - For any other purposes about which we reasonably deem appropriate.
7. We may also use the information you send to us via the Portal, to communicate with you by email and, possibly, other means, regarding products, services, offers, promotions and events we think may be of interest to you. However, you will always be able to opt-out of such communications at any time.

How we share information with third parties

8. We do not and will not rent or sell your Personal Data to anyone. We may share and disclose information (including Personal Data) about our customers in the following limited circumstances:
 - *Vendors, consultants, and other service providers:* We may share your information with third party vendors, consultants, and other service providers who we employ to perform tasks on our behalf. These companies include (for example) our payment processing providers, website analytics companies (e.g. Google Analytics), product feedback or help desk software providers, email service providers, and others.
 - If we received your Personal Data and subsequently transfer that information to a third party agent or service provider for processing, we will ensure that such third party agent or service provider processes your Personal Data in accordance with applicable law. Unless we have your consent or as otherwise permitted by applicable law, we do not authorize our agents to use the Personal Data we share with them beyond what is necessary to assist us.
 - *Business Asset Transfers:* We may choose to buy or sell assets, and may share and/or transfer customer information in connection with the evaluation of and entry into such transactions. If we (or our assets) are acquired, or if we go through some other change of control, Personal Data could be one of the assets transferred to or acquired by a third party.
 - *Group Companies:* We may also share your personal data with our holding companies, subsidiaries and/or affiliates for purposes consistent with this Privacy Policy.
 - *Protection or Enforcement of Rights:* We reserve the right to access, read, preserve, and disclose any information as necessary to comply with law, court order or rules of any listing authority or stock exchange; enforce or apply our agreements with you and other agreements; or protect the rights, property, or safety of our company, our holding companies, our subsidiaries, our affiliates, our employees, our users, or any other relevant persons.
 - *National Security or Law Enforcement:* Under certain circumstances, we may be required to disclose your Personal Data in response to valid requests by public authorities, including to meet national security or law enforcement requirements.

How we protect your information

9. We have an information security program that contains administrative, technical, and physical controls that are designed to safeguard your Personal Data. Nevertheless, unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time. We encourage you to take appropriate measures to protect your personal information, such as using strong passwords, keeping your login credentials confidential, and logging out of your account when you are finished using our services.
10. We also limit access to your Personal Data to those holding companies, subsidiaries, affiliates, employees, agents, contractors, and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.
11. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
12. We will only retain Personal Data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

Cookies

13. Our websites and some of our products use cookies and other similar tracking technologies (like web beacons, tags, and scripts) to uniquely identify your browser and to gather information about how you interact with the websites and products. We use this information for the following purposes:
 - Assisting you in navigation;
 - Assisting in registration, login, and your ability to provide feedback;
 - Analyzing your use of our products or applications; and
 - Assisting with our promotional and marketing efforts (including behavioral advertising).

Your data privacy rights

14. You have the right to request access to, correction or erasure of Personal Data that we hold about you or limit the way we process your Personal Data. All requests will be reviewed and processed in accordance with applicable law.
15. If you would like to access, correct, or erase your Personal Data or if you have any questions, comments or complaints (e.g. if you believe that Vistra has not handled your Personal Data properly or that it has breached its privacy obligations) or opt out from direct marketing at any time, please contact us.
16. You can accept or reject cookies by adjusting your web browser controls. All browsers are different, so visit the “help” section of your browser to learn about cookie preferences and other privacy settings that may be available.
17. Where indicated, it is obligatory to provide your Personal Data to us to enable you to register with us or to take advantage of some of our features. Should you decline to provide such Personal Data, we may not be able to provide you or continue to provide you with the Portal.

Marketing Communications

18. You can opt-out of receiving promotional or marketing communications from us at any time, by using the unsubscribe link in the emails communications we send, or by contacting us.
19. If you have any account with us, we will still send you non-promotional communications, such as service-related emails.

International Data Transfers

20. We may transmit or transfer Personal Data from one jurisdiction to another. We will only do so in compliance with all applicable data protection laws and regulations.

Linked Websites

21. For your convenience, hyperlinks may be posted on our websites that link to other websites (“**Linked Sites**”). We are not responsible for, and this Privacy Policy does not apply to, the privacy practices of any Linked Sites or of any companies that we do not own or control. Linked Sites may collect information in addition to that which we collect on the Websites. We do not endorse any of these Linked Sites, the services or products described or offered on such Linked Sites, or any of the content contained on the Linked Sites. We encourage you to seek out and read the privacy policy of each Linked Site that you visit to understand how the information that is collected about you is used and protected.

Children

22. We do not knowingly collect or solicit Personal Data from anyone under the age of 13. If you are under 13, please do not attempt to register for the Services or send any Personal Data about yourself to us. If we learn that we have collected Personal Data from a child under 13, we will delete that information as soon as possible.

Updates to this Privacy Policy

23. We are constantly trying to improve our websites and products, so we may need to change this Privacy Policy from time to time without any prior notice. We will place a notice on our websites and/or send you an email (if you have registered your email address with us) when we are required to do so by applicable Laws. You are responsible for periodically reviewing this Privacy Policy.

How to contact us

24. You may contact us at privacy@vistra.com or in the following ways:

Hong Kong	Tricor Services Limited Unit 1501-1502, 15/F, Manulife Place, 348 Kwun Tong Road, Kowloon Hong Kong
Singapore	Tricor Singapore Pte. Ltd. 9 Raffles Place #26-01 Republic Plaza, Singapore 048619
Malaysia	Tricor Services (Malaysia) Sdn Bhd Unit 30-01, Level 30, Tower A, Vertical Business Suite, Avenue 3, Bangsar South, No. 8 Jalan Kerinchi 59200 Kuala Lumpur, Malaysia Attention: Vistra Malaysia Personal Data Privacy Officer Contact No: (60)3 2783 9191