

(Last updated: 16 October 2025)

1.0 OUR PROMISE

This Privacy Policy describes how Aztech Global Ltd. and its subsidiaries (“Aztech”, “we” or “us”) collect, use, disclose, process and protect the Personal Data you provide to us.

In this Privacy Policy, “Personal Data” refers to data, whether true or not, about an individual who can be identified from that data alone, or from that data and other information to which we have or are likely to have access. “Services” refers to any services provided by us, including but not limited to services provided through your interaction with our website and any sales, marketing, events and other related services.

BY USING AZTECH'S WEBSITE AND SERVICES, YOU REPRESENT AND WARRANT THAT YOU HAVE READ AND HEREBY ACKNOWLEDGE AND ACCEPT THE PROVISIONS HEREIN, INCLUDING ANY CHANGES WE MAY MAKE FROM TIME TO TIME. IF YOU HAVE QUESTIONS OR CONCERNS REGARDING OUR PRIVACY POLICY OR PRACTICES, PLEASE CONTACT US AT THE DETAILS PROVIDED BELOW. IF YOU DO NOT ACCEPT ANY OF THE PROVISIONS HEREIN, PLEASE DO NOT PROVIDE YOUR PERSONAL DATA TO US. PLEASE NOTE, HOWEVER, THAT IF YOU DO NOT PROVIDE YOUR PERSONAL DATA TO US, WE MAY NOT BE ABLE TO PROVIDE CERTAIN SERVICES TO YOU AND YOU MAY NOT BE ABLE TO USE CERTAIN FEATURES OF OUR WEBSITE.

2.0 PERSONAL DATA

The Personal Data we collect from you is necessary for us to successfully provide our Services to you. Personal Data which we may collect include, but are not limited to:

- (a) Your full name, address, country of residence, telephone number, email address and other Personal Data when you use our website or in the course of us providing Services to you;
 - (b) Information on your location, including but not limited to the region, country code, city code, mobile network code, mobile country code, cell identity, district name, longitude and latitude information, time zone settings and language settings;
 - (c) Information related to your use of certain Services, including but not limited to cookies and other anonymous identifier technologies, IP address, network request information, temporary messaging history, standard system logs and crash information (please see our Cookies Policy for more information);
 - (d) Information related to the mobile device terminal through which you access our Website, including but not limited to: IMEI number, IMSI number, the version of
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your operating system, manufacturing information about your device, model name, and network operator;

- (e) Environmental characteristics value (e.g. value generated from phone device ID, connected Wi-Fi ID and location value); and
- (f) Anonymous information which are aggregated, anonymised or de-identified. For example, the device model and system version number of your mobile phone device may be collected when you use a particular Service. Such information is collected in order to improve the Services we provide to you.

We collect Personal Data from individuals applying for employment with us and from employees during their employment with us.

As a security measure, we may request that visitors attending our facilities provide Personal Data if they wish to access our facilities and/or our wireless internet infrastructure.

Please note that our Privacy Policy does not apply to other third party websites which may be accessed through our website and may collect your Personal Data. We shall not be responsible for the privacy practices of such third parties and advise that you review their privacy statements.

When you become a shareholder of Aztech Global Ltd. and for the period of your shareholding in Aztech Global Ltd., we may collect your Personal Data and provide such Personal Data to our Company Secretary, investor relations team and appointed share registrar. We may, if necessary, also obtain information regarding your shareholding in Aztech Global Ltd. from our appointed share registrar and/or the Central Depository (Pte) Limited.

3.0 USING PERSONAL DATA

You hereby consent that we may process and disclose Personal Data to our related companies and/or third party service providers for the purposes stated in this Privacy Policy.

Your Personal Data may be used for one or more of the following purposes:

- (a) Providing Services to you and performing any functions related to the Services, including managing our relationship with you and responding to your requests, queries and feedback;
 - (b) If push services are available on our Website, Personal Data such as IMEI Numbers will be used for providing such services. You may turn off this feature at any time;
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- (c) Conducting promotional and marketing activities, details of which can be found in the Direct Marketing section below;
- (d) Analyzing and developing statistics on the use of our Services to improve our Services;
- (e) Conducting relevant checks to prevent and detect fraud and crime;
- (f) Complying with disclosure requirements pursuant to applicable laws, guidelines and regulations; and
- (g) Internal record keeping.

4.0 DIRECT MARKETING

We may use the Personal Data you provide to us to market products and services offered by us or our business partners to you. We will only use your Personal Data after we have obtained your consent in accordance with the applicable data protection laws. You have the right to opt in to, or out of, the use of your Personal Data for direct marketing. You may opt out from receiving some or all types of communication from us by clicking on the unsubscribe link located at the bottom of each email. We will not transfer your Personal Data to our business partners for their use in the course of our direct marketing.

5.0 DISCLOSURE OF PERSONAL DATA

We may disclose your Personal Data to law enforcement agencies and/or government authorities as required by law.

We may disclose your Personal Data to other related companies of Aztech and/or other third parties as necessary to provide you with the full functionality of our Services. We do not sell any Personal Data to third parties.

Third party service providers may process your Personal Data on Aztech's behalf or for one or more of the purposes listed above. If we share your Personal Data with a third party service provider, we will take all reasonable steps to ensure that the Personal Data is accorded a comparable level of protection. However, Aztech does not provide any warranty in respect of, or bear any responsibility for, any misuse of your Personal Data by third parties.

6.0 INSTANCES WHERE CONSENT IS NOT REQUIRED

We may share anonymised information in aggregate form with third parties (such as advertisers on our website) for commercial purposes. We may share trends in the usage of our Services, for example, the number or particular group of customers who engage in certain transactions.

For the avoidance of doubt, we may collect, use, or disclose your Personal Data without your consent if it is, and only to the extent it is, expressly permitted by local data protection laws. We may also disclose your Personal Data without your consent if we believe in good faith that it must be disclosed in order to protect our rights, your safety, or the safety of others, to investigate fraud, or to respond to government requests.

7.0 SECURITY COMMITMENT

We are committed to keeping your Personal Data secure. In order to prevent unauthorised access to and disclosure of your Personal Data, we have put in place reasonable physical, electronic and internal procedures to protect the Personal Data we collect from you.

We store your Personal Data on secure servers which are protected in controlled facilities, controlled either directly by us or by a third party contracted by us, and have implemented special access control measures for cloud-based data storage.

We classify your Personal Data based on importance and sensitivity and will take all reasonable steps to protect your Personal Data. You should, however, be aware that the use of the internet is not entirely secure, and for this reason, we cannot guarantee the security or integrity of any Personal Data transferred via the internet.

In the event of a Personal Data breach, we will act upon the breach in a timely manner and notify you and the relevant authorities and/or the relevant data subjects in accordance with applicable data protection laws.

8.0 RETENTION POLICY

We shall retain your Personal Data for as long as the Personal Data is still required for the purpose(s) for which it was obtained or for as long as required by applicable laws. We shall cease to retain the Personal Data and remove the means by which the Personal Data can be associated with particular individuals as soon as it is reasonable to assume that the purpose for which the Personal Data was collected is no longer being served by the retention of the Personal Data. If further processing of the Personal Data is required for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes according to the applicable laws, your Personal Data may continue to be retained by us even if the further processing is

incompatible with original purposes. In such cases, we will notify you of the new purpose(s) for which your Personal Data will be used.

9.0 ACCURACY OF PERSONAL DATA

Please ensure that the Personal Data provided to us is accurate and complete. We shall be entitled to assume that all Personal Data provided to us is accurate and complete. If you disclose Personal Data of a third party to us, you represent and warrant that you have obtained the consent of that third party for such disclosure and for our collection and use of the Personal Data for the purposes stated in this Privacy Policy.

10.0 ACCESS, CORRECTIONS AND RESTRICTIONS ON PROCESSING

You have the right to request access to, and to correct, any Personal Data we collect about you. You will be asked to verify your identity before your request to access and/or update your Personal Data is processed. Once we have completed the identity verification step, we will be able to process your request to access and/or make corrections to your Personal Data. We will respond to your request within the time frame specified by applicable data protection laws.

A copy of your Personal Data collected and processed by us will be provided to you upon your request free of charge. We may charge a reasonable fee based on actual administrative costs in accordance with applicable laws in respect of any additional requests for the same Personal Data. If you would like to request access to your Personal Data held by us or if you believe any information we hold about you is incorrect or incomplete, please write to us or email us at dpo@aztech.com as soon as possible.

If you are using or accessing our Services from the European Union (EU), under the General Data Protection Regulation (GDPR), you have the right to request the erasure of your Personal Data. Where you have made a request to us for erasure, we shall consider the grounds regarding your request and take reasonable steps, including technical measures, in accordance with the GDPR.

As an EU user, you also have the right to restrict the processing of your Personal Data in certain circumstances. We shall consider the grounds of your restriction request. If the grounds under the GDPR apply, we shall only process your Personal Data under applicable circumstances in the GDPR and inform you accordingly.

As an EU user, you also have the right not to be subject to a decision based solely on automated processing, including profiling, and the right to receive your Personal Data in a structured, commonly used format or to transmit it to another data controller.

11.0 TRANSFER OF PERSONAL DATA

Aztech is a Singapore-headquartered company operating globally. As such, we may transfer your Personal Data to any subsidiary of the Aztech group worldwide when processing such Personal Data for the purposes described in this Privacy Policy and will comply with the applicable laws in undertaking such transfers.

To the extent that we need to transfer Personal Data outside your jurisdiction, including transfers to our affiliates (which may include communications, social media, technology, or cloud services) or to third party service providers, we shall do so in accordance with the applicable laws. In particular, to ensure that all such transfers comply with applicable local data protection laws, we will implement appropriate security safeguards. You have the right to be informed of the appropriate safeguards implemented by us for this transfer of your Personal Data. By using our Services, you agree to such transfer(s) of your Personal Data.

We may use overseas facilities operated and controlled by us to process or back up your Personal Data. These facilities may be located in a country outside the European Economic Area (EEA). We may transfer and store your Personal Data in any of our overseas facilities. In undertaking such transfers and storage of your Personal Data, we will ensure your Personal Data is protected in accordance with this Privacy Policy and applicable laws.

We may also transfer your Personal Data to our third party service providers, who may be located in a country or area outside the EEA.

Whenever we share Personal Data originating in the EEA with a data center, or third party which may or may not be a Aztech entity, outside the EEA, we will do so in line with EU standard contractual clauses and any other safeguards provided for in the GDPR.

12.0 WITHDRAWAL OF CONSENT

You may contact us at dpo@aztech.com to withdraw your consent for our collection, use and/or disclosure of any of your Personal Data we hold. We will process your withdrawal of consent within a reasonable period. You acknowledge that your withdrawal of consent may result in legal consequences. Depending on the extent of your withdrawal of consent for us to process your Personal Data, you may not be able to use or access our Services.

13.0 MINORS

Aztech does not knowingly collect Personal Data from minors for any purpose. If parents or guardians have reason to believe that a minor has provided Personal Data to Aztech without their prior consent, they should notify us at dpo@aztech.com. Upon receiving such notification, we will ensure that the relevant Personal Data is deleted and that subscriptions for any of our Services which the minor may have signed up for are cancelled.

14.0 INCONSISTENCIES WITH THIS PRIVACY POLICY

If you enter into a separate user agreement with Aztech and the user agreement is inconsistent with this Privacy Policy, the user agreement shall prevail.

15.0 UPDATES TO THIS PRIVACY POLICY

We periodically review our Privacy Policy and may update it to reflect changes in our practices and applicable legislation. If we make a substantial change to this Privacy Policy, we will release a notice on our website and/or notify you by email. Changes to this Privacy Policy will be effective starting on the date specified on this page. We recommend that you visit this page regularly to be informed of any changes to our privacy practices. Your continued use of our Services will be deemed as your acceptance of the updated Privacy Policy. If we collect additional Personal Data from you, or if we wish to use or reveal your Personal Data for a new purpose, we will seek your consent again in these instances.

16.0 CONTACT US

If you have any questions or feedback regarding this Privacy Policy, or if you have any questions regarding our collection, use or disclosure of your Personal Data, please contact our Data Protection Officer at the address or email stated below.

Address:

Aztech Global Ltd.
31 Ubi Road 1, #01-05,
Singapore 408694

Email: dpo@aztech.com
