

Privacy Policy

1. Introduction

1.1. SANDAI INVESTMENT CO., LTD. or any affiliate of SANDAI INVESTMENT CO., LTD. (referred to herein as “SANDAI INVESTMENT CO., LTD.”) may process Client’s personal data to optimize the provision of services and allow access to requested products.

1.2. Data processing means collection, recording, arrangement, storage, alteration, disclosing, consultation, extraction, use, transmission, cross-use, transferring or granting access to third parties, interconnecting, closure, deletion or destruction of data, or several of the aforementioned operations, regardless of the manner in which they are performed, or the means used

1.3. This Privacy Policy applies to all personal data that SANDAI INVESTMENT CO., LTD. processes through its website as well as any other affiliated websites and applications. This Policy applies also to personal data collected during the correspondence held with us by any means (email, telephone or otherwise) or any personal information collected during the provision of services

1.4. This Policy outlines the type of data SANDAI INVESTMENT CO., LTD. processes and means of collection, the use/storage of the data, basis for processing and sharing data with third parties, retention period and data privacy rights of the Client.

1.5. By opening an account with SANDAI INVESTMENT CO., LTD., the Client hereby gives its consent to the collection, processing, storage and use of personal data as explained below.

2. Type of Means of Data Collection

2.1. SANDAI INVESTMENT CO., LTD. may collect in databases any publicly available data or any data voluntarily submitted by data subjects. Only data necessary for the provision of service to the clients and/or for the performance of operations requested by the clients may be requested from the clients.

2.2. The type of personal data SANDAI INVESTMENT CO., LTD. may collect, includes among others the name, address, ID/passport, place and date of birth, gender, phone number, email address of the Client, any other data obtained for validation of application or use of services as well as any information collected during the course of the relationship that does not directly relates to the provision of services.

2.3. The personal data may be collected automatically when the Client visits the website and may include the IP address, device type, identification number, type of browser, geographic location and any other information automatically stored when accessing our database.

2.4. Data may be also collected if provided voluntarily by the Client when arranging completion of application forms, sending them by post, email or providing information over telephone or email and may include personal details, contact information, financial data or any other data processed as part of the course of business.

3. Use/Storage of Data

3.1. SANDAI INVESTMENT CO., LTD. shall collect and process the clients’ data to the extent, which is necessary for the achievement of specified objectives (provision of services), and in a manner, which is designed

for the specific purpose. Unnecessary data shall be deleted or destroyed at once. Use of data in any other manner than previously agreed is permitted only with a respective consent of the data subject or on the conditions specified by law.

3.2. SANDAI INVESTMENT CO., LTD. shall compile a list and documentation of means used in data processing and shall keep records of data processing. The list of means used in data processing shall include the name, type, and number of the equipment and the name of the manufacturer of the equipment; the name and number of the license of the software used and the name of the software manufacturer; the location of the documentation of the software used.

3.3. Persons engaged in the processing of data shall process data only for authorized purposes under the established conditions and according to the instructions and orders received, and they shall maintain the confidentiality of data which has become known to them in the course of the performance of their duties and which are not intended for public use. Such confidentiality requirements continue after termination of the employment or service relationship with SANDAI INVESTMENT CO., LTD..

3.4. Unauthorized processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorized transportation of records and any other unauthorized use of data (not prescribed by official duties) is prohibited.

3.5. Adequate security measures, including encryption of data if necessary, shall be implemented upon transmission of data by means of data communication equipment or in the transport of records.

3.6. Every user of the database shall be issued personal means of authentication, enabling them to use the database. The access password for electronic databases shall be changed at least once a quarter. The use of any means of automatic entry of passwords shall be prohibited. A user of the data processing system shall not have access to data, which are not required for authorized data processing and the performance of duties of that particular user.

3.7. SANDAI INVESTMENT CO., LTD. shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterward enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmissions of data. A possibility for restoring the content of data before modifications shall be available when any modifications are made in data or documents.

3.8. The manager or employee of SANDAI INVESTMENT CO., LTD. shall rely on justified expectations that data submitted are correct. The manager or employee of SANDAI INVESTMENT CO., LTD. shall, from time to time, verify the accuracy of data in the database(s) by requesting the person submitting data to check the data and, if necessary, make corrections or confirm the accuracy of data.

3.9. Any incomplete or incorrect data known to the manager or an employee of SANDAI INVESTMENT CO., LTD. shall be closed and any necessary measures shall be taken promptly to supplement and correct the data in question. Upon a request of a data subject, the manager or an employee of SANDAI INVESTMENT CO., LTD. shall

correct any incorrect data on the data subject in the database if the data subject notifies the manager or employee of the inaccuracy of the data on the data subject and submits correct data; the incorrect data shall be stored with the correct data and with a note indicating in which period the incorrect data were used.

3.10. If the accuracy of data is in dispute, the data in questions shall be closed until confirmation of accuracy of the data or determination of correct data. Third persons who provided or received the data shall be promptly notified of any corrections made in data if it is technically feasible and does not lead to disproportionate expenses.

3.11. The managers and employees of SANDAI INVESTMENT CO., LTD. shall register and preserve the data and documents associated with the provision of services, including:

a) Documents, which specify the rights and obligations of SANDAI INVESTMENT CO., LTD. and the clients, or the conditions of provision of service by SANDAI INVESTMENT CO., LTD. to the clients;

b) Details of provided services and transactions and any communications between the clients and SANDAI INVESTMENT CO., LTD. to the extent, which ensures an overview of the actions of SANDAI INVESTMENT CO., LTD. in the provision of services.

4. The Basis for Processing Personal Information and Sharing with Third Parties

4.1. SANDAI INVESTMENT CO., LTD. may process personal data in cases where it has the Client's consent to do so, for reason of concluding a contract, to comply with a legal obligation or where such action is in SANDAI INVESTMENT CO., LTD. legitimate interest.

4.2. SANDAI INVESTMENT CO., LTD. may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to the Client.

4.3. SANDAI INVESTMENT CO., LTD. does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

4.4. SANDAI INVESTMENT CO., LTD. reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authorities.

4.5. SANDAI INVESTMENT CO., LTD. may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

4.6. In addition, SANDAI INVESTMENT CO., LTD. may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose.

4.7. SANDAI INVESTMENT CO., LTD. is not responsible for the privacy policies or the content of sites links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

5. Data Retention

5.1. SANDAI INVESTMENT CO., LTD. will retain personal data for as long as it is necessary to carry out the purposes set out in this Policy unless otherwise required by the Law.

5.2. Client agreements and/or conditions of the provision of service by SANDAI INVESTMENT CO., LTD. to the clients shall be preserved for at least as long as the contractual or other legal relationship connected to the provision of services to the client continues unless a longer term is specified by law.

5.3. The retention of data will be subject to periodic review.

6. Rights of the Data Subject

6.1. The Client shall have the right to withdraw at any time the consent for the processing of personal data, in which case SANDAI INVESTMENT CO., LTD. shall cease processing the data to the corresponding extent.

6.2. Every person has the right to access data concerning themselves, to obtain a copy of such data, to rectify any inaccurate information, collected unless this right is restricted by law. Decisions on granting or withholding authorizations for access to data and issuing copies of data shall be made by the executive manager of SANDAI INVESTMENT CO., LTD..

6.3. Every person has the right to request from SANDAI INVESTMENT CO., LTD. to stop processing their data. In such cases, the provision of services and benefit from certain features may not be possible.

6.4. Upon request of the Client, SANDAI INVESTMENT CO., LTD. shall notify the data subject of the data, which is available, and the sources of such data, the purpose of data processing and any third parties or categories of third parties that have received authorization for data transmission, as well as any other facts of which the owner (processor) of the database is required to notify the data subject, unless the right of the data subject to receive information is restricted by law. The data shall be issued by using the method requested by the data subject, if possible, within five business days from the receipt of the respective request.

6.5. In the cases specified by law, data shall be released to third parties with a statutory right to request and receive such data. In all other cases, data shall be released to third parties only if the data subject has granted a respective consent.

6.6. Authorized persons may review, on-site in SANDAI INVESTMENT CO., LTD., the documents on the establishment of databases and any other documents pertaining to the databases.

6.1. The Client shall have the right to withdraw at any time the consent for the processing of personal data, in which case SANDAI INVESTMENT CO., LTD. shall cease processing the data to the corresponding extent.

7. Data Deletion

7.1. The Client shall have the right to delete personal data at any time by following instruction:

Client side: Profile -> Security -> Delete Account

Server side: clear all records

Privacy and Data Protection Policy

1. How do we store personal information and for how long?

We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Personal data provided by you as a prospective client during account opening registration in case the registration was never completed or your account opening application was rejected, will be maintained for six months unless there is a regulatory reason requiring us to keep it for a longer period of time.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

When we transfer your data to other third parties outside the EEA, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements

If you would like a copy of such arrangements, please contact us using the contact details below

2. Your rights

Please note that these rights do not apply in all circumstances. You are entitled to:

- (a) request access to your personal data (commonly known as a “data subject access request”);
- (b) request correction of the personal data that we hold about you;
- (c) request erasure of your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- (d) object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- (e) request restriction of processing of your personal data. This enables you to ask us to

suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy
- where our use of the data is unlawful, but you do not want us to erase it
- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims or you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it

(f) request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information (i.e. not to hard copies) which you initially provided consent for us to use or where we used the information to perform a contract with you; and

(g) withdraw consent at any time where we are relying on consent to process your personal data.

Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: info@sandaiinvestment.com.kh

Erasure requests can also be submitted through your online portal.

We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request.

Alternatively, we may refuse to comply with your request in these circumstances.

3. Notification of Breaches

In the event of unauthorized breaches or intrusions into our systems, that may affect your personal data security, we will notify you as soon as it is practically feasible and we will take all necessary measures and actions to avoid future occurrences and similar phenomena.

4. Contact us

If you have questions about this Privacy and Data Protection Policy or the way personal information is processed or used in connection with the use of our Software Applications or websites, please [contact us](#). Your request must include your name and other information needed for the identification, as well as for the full and complete processing of your request.