



# Privacy Policy

DOCUMENT



## Privacy Policy

PFYN 2019/02

*This policy describes how we treat personal information.  
It applies to personal information we collect on the sites  
and apps where it is found.*

*This Privacy Policy was issued by the  
Advisory Board of PFYN Advisory Pte. Ltd. in February 2019*

# Privacy Policy

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## **We collect information from and about you.**

**We collect contact information.** As part of the registration process on Xodiac.io, we collect your name and email address. We may also collect your address and phone number.

**We collect identity verification information.** We may collect photo copies of your government-issued ID. We may also collect copies of your utility bills.

**We collect information from third parties.** We may have connections from our website to social media platforms. We may collect name and gender from those platforms. We may also collect information from third parties. This may include information to verify your identity.

**We collect usage and device information.** We may collect information about the browser or device you are using. We may also collect technical information about how you connected to us. This might include your operating system or phone model. We might also collect ISP or mobile carrier information. We also collect IP addresses.

## **We collect information in different ways.**

**We collect information directly from you.** We collect information when you register on our site or fill out a profile. We also collect information when you place an order. We also collect information if you subscribe to a newsletter or respond to a survey.

**We collect information from third parties.** We may collect information from your company. We may also collect information from those who validate identity.

**We collect information from you passively.** We use third party tools to collect information from you. We do this on our websites and in emails that we send to you. To learn more about the tools we use and your choices, read below.

## **We combine information.**

We may combine information that we get from a third party with information we already have. We may also combine information from your profile with information you submit in surveys.

## **We use information as disclosed and described here.**

**We use information to respond to your questions and requests.** We use information to respond to your questions and requests. We use your information to respond to questions about our solutions or resources or your relationship with us.

**We use information for surveys.** We use information to tell you about new products. We use information we have about you to tailor these invitations to you. We also may use your information to send you product surveys.

**We use information to improve products and services.** We use your information to improve our sites and services. We use your information to customize your experience with us. Information you provide helps us respond to your customer service requests and support your needs more efficiently.

**We use information for security purposes.** We use your information to verify your identity. This includes using copies of your ID to verify your identity. We also use your information for anti-money-laundering purposes and to protect our company and our customers. We also use the information to protect our websites.

**We use information for marketing purposes.** We provide you with information about new products and special offers. We do this when legally permitted.

**We use information to communicate with you about our relationship.** We may contact you about this Privacy Policy or our Terms of Use. We may also contact you about your account and account settings. We may also contact you regarding updates to the features on our sites.

**We use information to process orders and payments, or assist in value transfers.** We use information you provide about yourself when placing an order to provide service to that order.

**We use information as otherwise permitted by law or as we may notify you.**

## **We may share information with third parties.**

### **We will share information with third parties who perform services on our behalf.**

We may share your personal information with trusted third parties for data processing and verification purposes. These include companies who serve as our vendors and help us ultimately deliver products or services to you.

### **We will share information if we think we have to in order to comply with the law or to protect you or ourselves.**

We will share information to respond to a court order or subpoena. We may share information if a government agency or investigatory body requests it. This includes U.S. law enforcement or regulatory authorities.

### **We may share information if we are investigating potential fraud.**

**We may share information with a successor to all or part of our business, as permitted by law.** If part of our business is sold, we may include customer information as part of that transaction. Where legally required, we will give you prior notice and if you have the legal right to do so, allow you to object.

**We will share information with our business partners and clients.** We may share billing information. We may also share usage statistics.

**We may share information for other reasons we may describe to you.**

## **You have certain choices about how we use your information.**

**You can opt out of receiving certain emails from us.** To opt out of marketing emails please email us at [info@pfyn.co](mailto:info@pfyn.co). You can also follow the instructions in any such message you get from us. If you opt out of marketing emails you will continue to receive messages from us about your relationship with us where permitted by law. You can deactivate your account from your user profile on our site.

**You can update your information.** To update or correct information you can log into your account. You can also email us at [info@pfyn.co](mailto:info@pfyn.co).

## **Our Cookie and Do Not Track Policies.**

**Our sites and apps may use cookies or other tracking tools.** Your browser may give you the ability to control cookies. How you do so depends on the type of cookie. Certain browsers can be set to reject browser cookies. If you block essential cookies, certain features on our Site may not work.

**Our Do Not Track Policy.** Some browsers have “do not track” features that allow you to tell a website not to track you. These features are not all uniform. We do not currently respond to those signals.

***Options you select are browser and device specific.***



## **This Site is not intended for children.**

**Our Site is meant for adults.** We do not knowingly collect personally identifiable information from minors (children under 18). If you are a parent or legal guardian and think your child has given us information, you can contact us via email or at the address listed at the end of this Privacy Policy. Please mark your inquiries “Child PII Request.” Parents, you can learn more about how to protect your children’s privacy online here.

## **We use standard security measures.**

**We use appropriate and reasonable security measures as required by relevant laws.**

The Internet is not 100% secure. We cannot promise that your use of our Site or App will be completely safe. We encourage you to use caution when using the Internet.

**We keep personal information for as long as necessary or relevant for the practices described here.** We keep information as otherwise required by law. If you cancel your account, we may keep archived copies of your information as permitted by law.

## **We may store information both inside and outside of the United States.**

**Information we collect may be stored in the United States.** If you live outside of the United States, you understand and agree that we may transfer your information in the United States. The United States may not afford the same level of protection as the laws in your country.

## **We may link to third party sites or services we do not control.**

**We may link to third-party sites and apps.** Our site may also include third party content that collects information. We do not control these third parties. This Policy does not apply to the privacy practices of that website or app. Please read the privacy policy of other websites or apps carefully. We are not responsible for the practices of these third-party sites or apps.

## Feel free to contact us if you have more questions.

If you have any questions about this policy or our privacy practices please email us at [info@pfyn.co](mailto:info@pfyn.co). You can call us at: **(+65) 6809-3757**. You can write to us at:

PFYN Advisory Pte. Ltd.  
Level 6, 137 Market Street  
Singapore, 048943

## We may update this Privacy Policy.

From time to time we may change our privacy policies. When we do, we will notify you of any material changes as required by law. We will also post an updated copy here.

**Effective Date: December 5, 2018 (Last Updated: January 20, 2019)**

+65 6809 3757 [www.pfyn.co](http://www.pfyn.co)

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