

## PRIVACY POLICY

This privacy notice ("Policy") applies to your use of all the mobile applications, products, software, services, websites, publications, email subscriptions, the content thereof, and other services provided by **GUGU**, which is the trading name of **Asia Win Inc Limited**. **Asia Win Inc Limited** is referred to as "GUGU," "we," "us," or "our" in this document.

When we refer to the Service, we mean any portion, aspect, or feature of our services. The words "you," "your," and "yours" refer to you as the user of the Service.

We are subject to the data protection requirements outlined in the **Privacy Act 1988** and the **Australian Privacy Principles** ("Applicable Laws"). We take your privacy very seriously, and this Policy is intended to inform you of the information we collect, how we use, process, and disclose it, and your rights in relation to it.

If you do not agree to the terms outlined in this Policy, please discontinue use of our Service, as we will not be able to provide access under these circumstances.

By accepting this Privacy Policy, you consent to the collection, use, and sharing of your information as outlined herein, as well as the transfer and processing of your data under the **Privacy Act 1988** and **Australian Privacy Principles**.

In the event of any inconsistency between translated versions, the English version of this Policy will prevail.

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## 1. WHAT INFORMATION DO WE COLLECT?

### PERSONAL INFORMATION YOU DISCLOSE TO US

We collect personal information you voluntarily provide when registering for the Service, expressing interest in our products or services, or during the course of our business relationship.

#### **Customer Due Diligence (CDD):**

We may collect the following for due diligence and record-keeping purposes:

- Full name
- Email address
- Nationality
- Phone number
- Date of birth
- Employment status

- Source of wealth
- Name and address of employer
- Occupation
- Identification (e.g., passport, national ID)
- Address
- Tax identification number
- Photograph of identification document
- Selfie
- Trusted contact details

#### **INFORMATION AUTOMATICALLY COLLECTED**

When you use the Service, we may automatically collect information such as:

- Device and browser characteristics
- Mobile device information (e.g., model, manufacturer, version)
- IP address and geolocation data
- Operating system and language preferences
- Usage data (e.g., interactions with the Service)

We may use cookies and similar technologies for analytics and functionality.

#### **INFORMATION FROM OTHER SOURCES**

We may collect information from public databases, electronic know-your-customer (eKYC) providers, or marketing partners.

## **2. HOW DO WE USE YOUR INFORMATION?**

We process personal information for the following purposes:

- Facilitating account creation and login
- Administering and managing your account
- Conducting risk assessments and security checks
- Sending marketing communications based on your preferences
- Complying with legal and regulatory obligations
- Conducting surveys and research
- Personalizing the Service to enhance user experience
- Responding to legal requests and preventing harm
- Protecting the integrity and security of the Service

## **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We may share information based on the following legal grounds:

- **Consent:** When you have given explicit consent.

- **Legal Obligations:** To comply with applicable laws or legal processes.
- **Legitimate Interests:** To fulfill legitimate business objectives.
- **Performance of a Contract:** To fulfill obligations under a contract.
- **Vital Interests:** To prevent potential harm or fraud.

#### **4. WHO WILL YOUR INFORMATION BE SHARED WITH?**

We may share information with:

- Our internal teams and affiliates
- Service providers (e.g., hosting, analytics, marketing)
- Business partners offering promotions or services
- Regulatory authorities or legal entities when required by law
- Fraud prevention agencies and credit reference agencies

#### **5. HOW LONG DO WE KEEP YOUR INFORMATION?**

We retain your information only as long as necessary for business or legal purposes, typically no longer than 7 years after account termination.

#### **6. HOW DO WE KEEP YOUR INFORMATION SAFE?**

We employ technical and organizational measures to protect your data. While we strive to ensure security, no system can be guaranteed as completely secure. Access the Service within a secure environment to minimize risks.

#### **7. WHAT ARE YOUR PRIVACY RIGHTS?**

You may:

- Review, update, or delete your account information via the Service.
- Opt-out of marketing emails by clicking the unsubscribe link.
- Opt-out of targeted advertising via device or browser settings.

For complaints regarding potential violations of this Policy, contact **support@gugu.fund**.

If unresolved, you may contact the **Office of the Australian Information Commissioner (OAIC)**:

- Email: **enquiries@oaic.gov.au**
- Phone: **1300 363 992**
- Mail: **GPO Box 5218, Sydney NSW 2001**

#### **8. DO WE MAKE UPDATES TO THIS POLICY?**

We reserve the right to modify this Policy at any time. Updates will be posted on the Service, and continued use constitutes acceptance of the revised terms.

#### **9. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

Email us at **support@gugu.fund**.

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