

PRIVACY NOTICE

Customer-facing · Last Updated: 4 September 2026

A1. INTRODUCTION

- A1.1 Welcome to Asia Digital Bank Ltd. ("ASIADB", "us", "we" or "our"). ASIADB is a company incorporated under the Labuan Companies Act 1990 and is licensed and regulated by the Labuan Financial Services Authority ("Labuan FSA") as a Labuan Investment Bank and Digital Financial Services Provider. ASIADB operates www.asiadb.com and the A-Bank Super Wallet App (collectively, the "Service").
- A1.2 This Privacy Notice is issued to all ASIADB customers and users pursuant to the Personal Data Protection Act 2010 ("PDPA"), as amended by the Personal Data Protection (Amendment) Act 2024, and applicable Labuan FSA guidelines. It explains the types of personal data we collect and our methods of collection; how we use, process, disclose, transfer and retain your personal data; our security measures; your rights as a data subject; and how changes to this Notice will be made.
- A1.3 By using our Service, you agree to the collection and use of information in accordance with this Privacy Notice. Our Terms and Conditions, together with this Privacy Notice, constitute your agreement with us.

A2. DEFINITIONS

- A2.1 For the purposes of this Notice: "Personal Data" means data about a living individual who can be identified from that data, or from that data together with other information in our possession or likely to come into our possession; "Sensitive Personal Data" includes information as to physical or mental health, political opinions, religious or similar beliefs, the commission or alleged commission of any offence, and biometric data; "Data Controller" means the person who processes or controls the processing of Personal Data (ASIADB is the Data Controller of your Personal Data); "Data Processor" means a person who processes Personal Data on behalf of the Data Controller; "Data Subject" means the living individual who is the subject of Personal Data; "Processing" means collecting, recording, holding or storing Personal Data, or carrying out any operation on it; "Cookies" means small files stored on your device; and "Usage Data" means data collected automatically through use of the Service.

A3. TYPES OF PERSONAL DATA COLLECTED

- A3.1 While using our Service, we may ask you to provide personally identifiable information, including:
- (a) full name, date of birth, nationality and identification documents;
 - (b) email address and phone number;
 - (c) residential and mailing address, country, state and postal code;
 - (d) financial information, including bank account details, transaction history and source of funds;
 - (e) biometric data collected for identity verification or KYC purposes, which is Sensitive Personal Data; and
 - (f) other information required for regulatory compliance, including anti-money laundering (AML) and know-your-customer (KYC) obligations.
- A3.2 Usage Data. We may also collect information that your browser or device sends whenever you visit or use our Service, including IP address, browser type and version, pages visited, time and date of visits, time spent on pages, unique device identifiers and other diagnostic data.

- A3.3 Cookies. We use Cookies to assist in fraud prevention, improve user experience and analyse Service usage. By accepting Cookies, you acknowledge that your information may be collected and used as outlined in this Privacy Notice.

A4. USE OF PERSONAL DATA

- A4.1 ASIADB uses the collected data to:
- (a) provide, maintain and improve our Service;
 - (b) monitor usage, detect and prevent fraud, and address technical issues;
 - (c) conduct KYC and credit checks and assess your financial status and creditworthiness;
 - (d) comply with applicable laws, regulations and guidelines, including those of Labuan FSA and AML/CFT obligations under the Anti-Money Laundering, Anti-Terrorism Financing and Proceeds of Unlawful Activities Act 2001 ("AMLATFPUAA");
 - (e) support internal audit, risk management and business operations;
 - (f) design and improve digital banking products and services;
 - (g) update and maintain the accuracy of our records;
 - (h) communicate with you regarding your account, transactions and Service updates; and
 - (i) send you news, offers and promotional information where you have given consent.

A5. DATA BREACH NOTIFICATION

- A5.1 In compliance with section 12B of the PDPA, ASIADB will, in the event of a personal data breach that causes or is likely to cause significant harm, notify the Personal Data Protection Commissioner as soon as practicable and in any event within seventy-two (72) hours of becoming aware of the breach, and notify affected data subjects without unnecessary delay and in any event within seven (7) days of the initial notification to the Commissioner.
- A5.2 Significant harm includes risk of physical harm or personal safety risks; financial loss or damage to credit records; misuse of personal data for illegal purposes; or identity fraud or misuse of Sensitive Personal Data.

A6. RETENTION OF PERSONAL DATA

- A6.1 ASIADB will retain your Personal Data only for as long as necessary for the purposes set out in this Privacy Notice, and thereafter for the minimum periods required by law — including not less than seven (7) years after the end of the business relationship or completion of the transaction, as required under the AMLATFPUAA, the Labuan Financial Services and Securities Act 2010 and applicable Labuan FSA requirements.
- A6.2 Usage Data is generally retained for a shorter period, except where it is used to strengthen security or improve the functionality of our Service, or where we are legally obliged to retain it for longer.

A7. TRANSFER OF PERSONAL DATA OUTSIDE MALAYSIA

- A7.1 Pursuant to the revised cross-border transfer framework under the PDPA and the Guidelines on Cross-Border Personal Data Transfer, ASIADB may transfer your Personal Data outside Malaysia only where:
- (a) the destination has in force a law substantially similar to the PDPA, or ensures an adequate level of protection at least equivalent to that under the PDPA;
 - (b) you have given your consent to the transfer;
 - (c) the transfer is necessary for the performance of a contract between you and ASIADB, or is entered into at your request;

- (d) the transfer is necessary for legal proceedings, obtaining legal advice, or establishing, exercising or defending legal rights; or
 - (e) the transfer is necessary to protect your vital interests, or is required in the public interest as determined by the Minister.
- A7.2 ASIADB will take all reasonably necessary steps to ensure that your Personal Data is treated securely and in accordance with this Privacy Notice, and no transfer will take place unless adequate controls, including data security measures, are in place at the destination.

A8. DISCLOSURE OF PERSONAL DATA

- A8.1 Law enforcement and regulatory compliance. We may disclose your Personal Data where required by law, court order, or valid requests by public authorities, including Labuan FSA and other applicable regulatory bodies.
- A8.2 Third parties. We may also disclose your Personal Data to:
- (a) our subsidiaries, affiliates and related entities;
 - (b) contractors, service providers, agents, auditors, investment service providers and business partners who assist us in processing, administering or fulfilling transactions or services on our behalf;
 - (c) external professional advisers and consultants for operational, legal and regulatory purposes;
 - (d) counterparties to transactions entered into on your behalf;
 - (e) any legal, regulatory, governmental, tax or law enforcement authority as required; and
 - (f) any party where necessary to protect the rights, property or safety of ASIADB, our customers or others.

A9. YOUR RIGHTS AS A DATA SUBJECT

- A9.1 Under the PDPA, you have the following rights:
- (a) Right to access — to request access to the Personal Data we hold about you;
 - (b) Right to correction — to request correction of any inaccurate, incomplete or outdated Personal Data we hold about you;
 - (c) Right to data portability — with effect from 1 June 2025 under section 43A of the PDPA, to request that your Personal Data be transmitted directly from ASIADB to another data controller, subject to technical feasibility and data format compatibility; and
 - (d) Right to withdraw consent — where processing is based on your consent, to withdraw that consent at any time. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal, or processing carried out on other legal grounds.
- A9.2 To exercise any of these rights, please contact the Compliance Department at info@asiadb.com, marked for the attention of the Compliance Department. We will verify your identity before acting on any request.

A10. HYPERLINKS TO THIRD-PARTY WEBSITES

- A10.1 Our Service may contain links to third-party websites or mobile applications not operated by ASIADB. These platforms operate under their own privacy policies, over which ASIADB has no control and for which ASIADB accepts no responsibility. You are advised to review the privacy policy of any third-party platform before submitting your Personal Data to it.

A11. CHILDREN'S PRIVACY

- A11.1 Our Service is not intended for individuals under the age of 18, and ASIADB does not knowingly collect Personal Data from minors under 18 years of age. If you become aware that a minor has provided us with Personal Data without appropriate parental or guardian consent, please contact us immediately at info@asiadb.com. If we become aware that we have collected Personal Data from a minor, we will take prompt steps to remove such information from our systems.

A12. LANGUAGE

- A12.1 This Privacy Notice is made available in English, and may also be made available in Chinese. In the event of any inconsistency between versions, the English version shall prevail to the extent permitted by law.

A13. CHANGES TO THIS PRIVACY NOTICE

- A13.1 ASIADB reserves the right to update or amend this Privacy Notice from time to time to reflect changes in our practices, the Service, or applicable laws and regulations. We will notify you of any material changes by posting the updated Privacy Notice on our webpage and, where practicable, via email or a prominent notice on our Service before the change takes effect.
- A13.2 The "Last Updated" date at the top of this Privacy Notice indicates when the latest revisions were made. You are encouraged to review this Privacy Notice periodically. Continued use of our Service following any changes constitutes your acceptance of the updated Privacy Notice.

A14. CONTACT US

- A14.1 If you have any questions, concerns or requests regarding this Privacy Notice or the processing of your Personal Data, please contact:

Asia Digital Bank Ltd. (Labuan Investment Bank)

Attention: Compliance Department

Email: info@asiadb.com Website: www.asiadb.com

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