

ACEXPRESS PTY LTD, our subsidiaries and affiliates ("ACEXPRESS" or "we" or "us") care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws to better serve you.

This Privacy Statement describes how Acexpress collects, uses, stores, protects, discloses and shares your personal information or data when you use our Services online through our website, in retail and through our mobile app (when applicable), as well as your choices about the way your information is collected and used. Personal information means all information or data relating to an identified or identifiable individual.

When you use our services, contact us, access our websites or applications or join our loyalty programs (collectively, the "**Services**"), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. We collect different types of personal information relating to you, which may include:

- Contact information, for example your name, postal address, e-mail address, telephone number, and date of birth, gender, citizenship, occupation, marital status, and government or national identification numbers;
- Transaction information, including your money transfers and bill payments;
- Business related information that helps us provide our Services to you, such as membership in our loyalty programs, how you use of our Services, bank and credit information, employer information and permissions to contact or marketing choices;
- Technical information, including the host from which you access the Internet, your IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, biometric data (e.g., Touch ID/Fingerprint to verify your identity) storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us. We collect personal information on your online activities as described in the section titled "**INTERNET TECHNOLOGIES.**"
- Compliance information, including fraud prevention, identity verification, and sanction checks.

To conduct a money transfer, or use other payment services, you must provide certain information required by Acexpress to execute the transfer and to enable us to comply with our legal obligations associated with transferring money. Failure to provide some of your personal information may affect our ability to provide our Services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

Acexpress collects your personal information in several ways:

- Through transaction forms and your interactions with Acexpress, its Affiliated Agents and partners;
- Through online forms, registrations for loyalty and rewards programs or competitions, and other online Services we may offer (some of which may be managed by third parties on behalf of Acexpress);
- While providing customer support or consultation, including using email, postal mail, call centres or live chat;
- Through the process of maintaining and upgrading our Services;
- Through automated means such as communications protocols, e-mail communications and cookies or similar **INTERNET TECHNOLOGIES**;
- Through our mobile applications (some of which may be managed by third parties on behalf of Acexpress);
- Through your use of social media or other public data sources; and
- Through your interest in Acexpress advertisements placed on third party sites.

In addition to the personal information we collect from you, we may also collect your personal information from the person to whom you send and/or receive money, as well as our Agents, vendors, business partners, identity verification companies, payments and fraud risk management companies, law enforcement bodies, and commercial and public data sources.

Acexpress endeavours to use organizational, technical and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavour to restrict information access to our employees, Agents and representatives that need to know it. Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as Acexpress.

Please contact us immediately in accordance with the "**CONTACTING US**" section, if you have reason to believe your personal information held by Acexpress may be at risk.

Acexpress will use internet technologies like cookies, tags and web beacons on our websites, in mobile applications or when you visit a third-party website for which Acexpress provides online Services for a variety of purposes, including, but

not limited to those identified in the section titled “**HOW ACEXPRESS USES THE PERSONAL INFORMATION IT COLLECTS**”.

Acexpress has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

For more information on how Acexpress uses cookies please request this information from our Compliance Officer at acexpress@unitedpacificfreight.com

Acexpress utilizes the personal information it collects for the following commercial purposes:

- **Performing the Services:** To assist us in providing Services to you and help you to receive a personalized experience and assist you in carrying out transactions and accessing account information.;
- **Authentication:** To recognize you and allow you to remain signed-in during your visit without having to re-enter your password;
- **Analytics:** To perform analytics on understanding our customers, improving their experience;
- **Web Traffic Analysis:** To determine whether you came to Acexpress from a banner ad or an Affiliate;
- **Advertising:** To deliver information specific to your interests on non-Acexpress websites and applications;
- **Analysis of Promotions:** To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- **Fraud Prevention:** To promote safety, reduce financial risk and combat fraud across our Services.

Acexpress may use your personal information as explained elsewhere in this Statement for each of the following legal bases:

- We use your personal information to provide our services to you: This includes using personal information necessary for conducting money transfers, payment services, prepaid cards, or loyalty programs. We may use this information in the performance of a contract with you or for taking steps to enter into a contract for any of the above or for any other Acexpress products or services.
- We use your personal information for legitimate business purposes: This includes using personal information to analyse and improve our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services.
- We use your personal information for legal and compliance purposes: This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our services or other illegal or wrongful activity. This may also include establishing, exercising, or defending legal rights and claims of Acexpress and others, and monitoring and reporting compliance issues. This may further include using your personal information to validate and authenticate your identity, and utilizing third parties to help us do so.
- We may process your personal information based on your consent as outlined in this Statement: This includes consent for receiving marketing communications, or where otherwise required by applicable law. If we request your consent, we will inform you of the intended purposes for which your information will be processed.
- We will inform you when your information is required to provide the services you request, or is required by law. In certain cases, such as performing money transfer services, we may be unable to provide you with our Services unless you provide certain personal information.

Acexpress will also, subject to your preferences, notify you of offers, promotions and updates regarding our products and Services. These may include offers by email, telephone, postal mail, SMS, social media and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt-out by following the instructions in the relevant electronic communication or by contacting us as described in the “**CONTACTING US**” section.

Please note that if you opt-out of receiving marketing-related communications from us, we may still send you important service, administrative or transaction-related communications.

Acexpress does not direct our Services or products at children under the age of 18. Acexpress does not knowingly collect or maintain information from our retail, website or mobile apps from persons under the age of 18.

Acexpress’ website may be linked to or from third party websites. Acexpress has not reviewed, does not control, and is not responsible for the content or privacy practices employed by websites that are linked to or from our website. Acexpress does not assume responsibility for any of these sites, their content, or their privacy policies. Acexpress does not endorse

third party websites or make any warranties about any information, software or other products or materials you may find there, or any results that may be obtained from using them.

For any of the purposes listed in this Statement, Acexpress may disclose applicable personal information including, but not limited to, your name, contact information, national identification number, customer ID number, address, transaction patterns and bank account information to the following types of organizations or parties:

- Acexpress' group companies and/or affiliates, including those listed in the section titled "**ACEXPRESS LEGAL ENTITIES**";
- Required local remittance licensing entities relevant to a transaction, including those listed in the section titled: "**NON-AFFILIATE LOCAL LICENSING ENTITIES**";
- Our Agents or business partners who facilitate the money transfer transaction or specific service you have requested;
- Vendors, payments processors, banking partners and data processors contracted to provide business and customer services;
- Customer services, based on your consent where applicable, including marketing, advertising and customer satisfaction and market research on our behalf;
- Vendors and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud and identity.
- Third parties whom you have authorized to access your account and/or your account information in order to perform Services for you, such as account information service providers and payment initiation service providers.

We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, credit reporting agencies, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Acexpress or others.

We transfer your information to parties in countries outside the country it was collected, including but not limited to Samoa, as permitted or required by applicable law, regulatory authorities, law enforcement and government agencies. Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law. We transfer certain personal information about you to our data centers located in Samoa or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply to our Services. We also store certain personal information we collect based on your marketing choices in our nominated IT company's data center. By using Acexpress' Services, you acknowledge that such transfers of information outside of your country of residence may occur.

Where Acexpress services are provided, and where Personal information transferred outside the EEA to countries that the European Commission has not found to provide adequate protection will be protected by appropriate contractual clauses or other EU-approved mechanisms, as required by law. You may obtain a copy of these measures by following this link: to https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/rules-international-transfers-personal-data_en

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information only if necessary for the specific purposes it was collected, or to resolve any query you may raise. We will typically keep your information for no longer than the purpose(s) for which it was obtained, unless we have a legal obligation to keep it for a longer period or retention is advisable for Acexpress' legal position (for example, regarding applicable statutes of limitations, litigation or regulatory investigations).

You have the right to know if we are processing your personal information and to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us from sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to delete certain information about you, to restrict certain uses of information relating to you, and to object to certain uses of it. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law. Registered users may also visit www.unitedpacificfreight.com/Acexpress and edit Profile settings. You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law. To exercise these rights, please contact Acexpress through the section titled "**CONTACTING US**". We will endeavour to respond to your request within 30 days but response time may vary depending on the laws and regulations applicable to your request, and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

If you have a question or complaint about how we handle your personal information, we ask that you put your inquiry in writing. We will investigate your inquiry and generally respond to you in writing within 30 days of receipt. You can also contact us, including our Acexpress Compliance Officer, at acexpress@unitedpacificfreight.com

You can also call our local office phone number, (+612) 9820 2486

Acexpress reserves the right to modify this Privacy Statement. Updated privacy statements will be posted on this Website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

Acexpress' authorized Affiliated Agents as at 13 April 2021 include the following:

Entity	Contact Information / Address
United Pacific Freight Pty Ltd	Unit 2, 12 Pembury Road, Minto NSW 2566, Australia

NON-AFFILIATED LOCAL AND OVERSEAS LICENSING ENTITIES

Entity	Contact Information / Address
Ah Liki Investment Corporation	Palisi, Apia, Samoa