

Capital Asia Investments Data Protection Policy

Personal Data Protection is important to us

Protection of your Personal Data is important to us. This Capital Asia Investments Data Protection Policy ("Policy") outlines how we manage the Personal Data we hold. The Policy applies to all departments and business units across Capital Asia Investments. Capital Asia Investments Pte Ltd (Reg. No. 201715674H), and/or its related corporations and affiliates (referred to hereunder as "CAI", "CAI Group", "Capital Asia Investments", "Capital Asia Investments Group", "we", "us" or "our") collectively or singularly as the context requires, recognise the importance of protecting Personal Data.

We at CAI take our responsibilities under Singapore's Personal Data Protection Act 2012 (the "PDPA") seriously. We also recognize the importance of the personal data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your personal data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the personal data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your personal data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your personal data, please do not hesitate to contact our Data Protection Officer (the "DPO") at:

Data Protection Officer
160 Robinson Road
#24-08 SBF Center
Singapore 068914

or by e-mail at: dpo@caipartners.com

For more information about PDPA can be found on the Personal Data Protection Commission's website at <http://www.pdpc.gov.sg>

What Personal Data We Collect

"Personal data" is data that can be used to identify a natural person. Some examples of personal data that we may collect are:

- (a) personal particulars (e.g. name, contact details, residential address, date of birth, identity card/passport details, and/or education details);
- (b) financial details (e.g. income, expenses, and/or credit history);
- (c) employment and business details (e.g. occupation, directorships and other positions held, employment history, salary, and/or benefits);
- (d) tax and insurance information;
- (e) information about your risk profile, investments, investment objectives, knowledge and experience and/or business interests and assets;
- (f) banking information (e.g. account numbers and banking transactions);
- (g) personal opinions made known to us (e.g. feedback or responses to surveys); and/or
- (h) images and voice recordings of our conversations with you;

Usage of Your Personal Data

We may use your personal data for our core business purposes, such as:

- (a) developing and providing wealth management and investment products or services (whether made available by us or through us), including but not limited to:
 - i. executing investments, banking, commercial or other transactions and clearing or reporting on these transactions;
 - ii. carrying out research, planning and statistical analysis; or
 - iii. analytics for the purposes of developing or improving our products and services.
- (b) assessing and processing applications, instructions or requests from you or our clients;
- (c) communicating with you, including providing you with updates on changes to products and services (whether made available by us or through us) including any additions, expansions, suspensions and replacements of or to such products and services, and their terms and conditions;
- (d) managing our infrastructure and business operations and complying with internal policies and procedures;
- (e) responding to queries or feedback;
- (f) addressing or investigating any complaints, claims or disputes;
- (g) verifying your identity for the purposes of providing products or services;
- (h) screenings or due diligence checks as may be required under applicable law, regulation or directive;
- (i) complying with all applicable laws, regulations, rules, directives, orders, instructions and requests from any local or foreign authorities, including regulatory, governmental, tax and law enforcement authorities or other authorities;
- (j) monitoring products and services provided by or made available through us;
- (l) creating and maintaining credit and risk related models;
- (m) financial reporting, regulatory reporting, management reporting, risk management (including monitoring credit exposures), audit and record keeping purposes;
- (n) enabling any actual or proposed assignee or transferee, participant or sub-participant of CAI's rights or obligations to evaluate any proposed transaction;
- (o) enforcing obligations owed to us; and/or
- (p) seeking professional advice, including legal advice.

We may also use personal data for purposes set out in the terms and conditions that govern our relationship with you or our client.

Use of Personal Data for Marketing Purposes

We may use your personal data to offer you products or services, including promotions and events, that may be of interest to you or for which you may be eligible. Such marketing messages may be sent to you in various modes including but not limited to electronic mail, direct mailers, short message service, telephone calls, facsimile and other mobile messaging services. In doing so, we will comply with the PDPA.

In respect of sending telemarketing messages to your Singapore telephone number via short message service, telephone calls, facsimile and other mobile messaging services, please be assured that we shall only do so if we have your clear and unambiguous consent in writing or other recorded form to do so or if you have not otherwise made the appropriate registration of that number with

the Do Not Call Registry. If we have an ongoing relationship with you and you have not indicated to us that you do not wish to receive telemarketing messages sent to your Singapore telephone number, we may send you telemarketing messages to that number related to the subject of our ongoing relationship via short message service, facsimile and other mobile messaging services (other than a voice or video call).

You may at any time request that we stop contacting you for marketing purposes via selected or all modes.

To find out more on how you can change the way we use your personal data for marketing purposes, please contact us (please see the “How to contact us” section below).

Nothing in this section shall vary or supersede the terms and conditions that govern our relationship with you.

Disclosure and Sharing of Personal Data

We may from time to time and in compliance with all applicable laws on data privacy, disclose your personal data to any personnel of Capital Asia Investments or to third parties, whether located in Singapore or elsewhere, in order to carry out the purposes set out above. Please be assured that when we disclose your personal data to such parties, we require them to ensure that any personal data disclosed to them are kept confidential and secure.

For more information about the third parties with whom we share your personal data, you may, where appropriate, wish to refer to the agreement(s) and/or terms and conditions that govern our relationship with you or our customer. You may also contact us for more information (please see the “How to contact us” section below).

We wish to emphasise that CAI does not sell personal data to any third parties and we shall remain fully compliant of any duty or obligation of confidentiality imposed on us under the applicable agreement(s) and/or terms and conditions that govern our relationship with you or our customer or any applicable law.

We may transfer, store, process and/or deal with your personal data outside Singapore. In doing so, we will comply with the PDPA.

Cookies and Related Technologies

Our web sites use cookies. A cookie is a small text file placed on your computer or mobile device when you visit a web site or use an app. Cookies collect information about users and their visit to the web site or use of the app, such as their Internet protocol (IP) address, how they arrived at the web site (for example, through a search engine or a link from another web site) and how they navigate within the web site or app. We use cookies and other technologies to facilitate your internet sessions, offer you products and/or services according to your preferred settings, track use of our website and to compile statistics about activities carried out on our website. More information on cookies can be found on www.aboutcookies.org

You may set up your web browser to block cookies. You may also remove cookies stored from your computer or mobile device. However, if you do block cookies, you may not be able to use certain features and functions of our website.

Personal data (if any) that we collect from you through cookies may be passed to our third party service providers, whether located in Singapore or elsewhere, for managing and/or administering our website, or for the purpose of data hosting/storage/backup.

Your use of our website constitutes consent by you to our use of cookies and to the matters set out herein.

Links to Other Websites

This website contains links to other sites that are operated by third party companies with different privacy practices. You should remain alert when you leave our site and read the privacy statements of other websites. We have no control over Personal Data that you submit to or receive from these third parties.

Retention of Personal Data

Your personal data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

Access and Correction

You may request access or make corrections to your personal data held by CAI. CAI may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you. We will also need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to work on your request.

These will be subject to ongoing obligations imposed on CAI pursuant to any applicable law or regulation, and/or CAI's legitimate reason or entitlement to continue processing your information, and/or to refuse that request.

Please contact us (please see the "How to contact us" section below) for details on how you may request access or correction to, or exercise your rights with respect to the processing of your personal data.

How to Contact Us

To contact us on any aspect of this policy or your personal data or to provide any feedback that you may have, please get in touch with our DPO at:

Data Protection Officer
160 Robinson Road
#24-08 SBF Center

Singapore 068914

or by e-mail at: dpo@caipartners.com

Amendments and Updates of Capital Asia Investments Data Protection Policy

We may amend this policy from time to time to ensure that this policy is consistent with any developments to the way CAI uses your personal data or any changes to the laws and regulations applicable to CAI. We will make available the updated policy on our website (www.caipartners.com). All communications, transactions and dealings with us shall be subject to the latest version of this policy in force at the time.