



SINGAPORE DATA PROTECTION NOTICE

Your privacy is of utmost importance to us. This data protection notice (the “Notice”) outlines how we collect, use, store and disclose your personal data in accordance with the Personal Data Protection Act (“PDPA”). The PDPA strives to protect personal data of individuals. Please take a moment to read about how we collect, use and/or disclose your personal data so that you know and understand the purposes for which we may collect, use and/or disclose your personal data.

This Notice supplements but does not supersede nor replace any other consent which you may have previously provided to us nor does it affect any rights that we may have at law in connection with the collection, use and/or disclosure of your personal data. We may from time to time update this Notice to ensure that this Notice is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, the prevailing terms of this Notice shall apply. For the avoidance of doubt, this Notice forms part of the terms and conditions governing your relationship with us and should be read in conjunction with such terms and conditions.

What is Personal Data?

Personal data refers to any data or information about you from which you can be identified either (a) from that data or (b) from that data and other information to which we have or are likely to have access.

Depending on your relationship with us (e.g. prospective or current client, employee or business partner), the personal data about you that we may collect, use, store and disclose include:

- 1) your contact details like your name, passport or other identification numbers, contact numbers, address, email;
- 2) your personal details enabling us to evaluate and manage your client, employment or business relationship with us, e.g. your work experience, education, date of birth, bank details;
- 3) your personal details enabling us to analyse your situation, determine suitable strategies and execute respective action, e.g. family status, financial status, transaction history;
- 4) photos and videos of you from our events or office surveillances; and
- 5) Information about your use of our services and website, including cookies and IP address.

We Keep Your Personal Data Confidential and Secure

At each stage of data collection, use and disclosure, we implement physical, electronic, administrative and procedural safeguards to protect your personal data against loss, misuse, damage and unauthorized access, modifications or disclosures.

Purposes for Collection, Use and Disclosure of Your Personal Data

We collect, use and/or disclose your personal data to provide enhanced asset management services and/or family office services, including operations for these purposes. This may include the following (non-exhaustive) as applicable to the relationship we have with you:

- a) Evaluating your standing, resources and capabilities to enter or maintain a relationship with you as a client, employee, business partner or other;
- b) Analysing your financial situation and determining financial strategies and products suitable for you as our client;
- c) Assessing and processing any applications, requests and instructions for financial products and services offered by us and/or other financial institutions or product providers for you as our client;
- d) Managing commercial and financial risks, including preventing, detecting and investigating crime, including fraud and any form of financial crime;
- e) Reporting to you as our client on your financial situation and our performance of our services to you, processing any corporate actions which affect your investments (which may arise in connection to any merger, acquisition or asset sale);
- f) Evaluating your performance as our client, employee, business partner or other;
- g) Updating you in relation to our management of your investments, our services, products, newsletters and related investment and market information, reports or commentaries;
- h) Responding to your queries and requests and handling complaints, if any;
- i) Internal reporting and analysis related to our business operations;
- j) Maintaining records of our interactions with you, through telephone recordings, documentation (hard copy and electronic), and
- k) Any other purposes related to the above purposes. If we wish to collect, use, retain and/or disclose your personal data for any other purposes, we will adequately seek your consent.

How We May Collect Your Personal Data

Generally, we may collect your personal data ourselves or through third parties in ways including the following:

- a) During our preliminary discussions with you to establish a new client relationship, enter into employment or for any other business relationship;
- b) When you interact with our employees;
- c) When you communicate with us by email or telephone, your emails will be retained and we may monitor and/or record your voice calls to us;
- d) When you attend our events or enter our premises, we may take pictures or videos or you may be captured on our closed circuit television cameras surveillance;
- e) When you access our website;
- f) When you respond to our requests for additional personal data; or

- g) Processing your application including the conducting of pre-recruitment checks, such as in relation to your credit standing and qualifications;
- h) Providing or obtaining references and for background screening/vetting from your referees, past employers, present or past colleagues and the staff of past academic institutions
- i) Collecting information to assess your suitability for the position applied for;
- j) Communicating with you as is required to comply with our policies and processes, including for business continuity purposes;
- k) Maintaining our records where you have not been successful in your job application to us, to inform you should a suitable position which might be of interest to you be open in the future; or where you are subsequently employed by us and thereafter leave our employment, to provide you a reference, when so requested by your future prospective employer; and
- l) When you submit your personal data to us for any other reason.

You are responsible for ensuring that the personal data you provide to us is accurate, complete, and not misleading and that such personal data is kept up to date. You acknowledge that failure on your part to do so may result in our inability to provide you with the products and services you have requested. To update your personal data, please reach out to our PDP Officer.

Where you provide us personal data concerning individuals other than yourself, you are responsible for obtaining all legally required consents from the concerned individuals and you shall retain proof of such consent(s), such proof to be provided to us upon our request.

Use of cookies

Your activity may however be monitored by Cookies or other navigational data. "Cookies" are small data files sent to your browser to store and track information about you when you enter our websites. The cookie is used to track information such as the number of users and their frequency of use, profiles of users and their preferred sites. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website.

Data Security

We will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that, for example, no harmful code

will enter our website (e.g., viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites.

While we strive to protect your Personal Data, we cannot ensure the security of the information you transmit to us via the Internet, and we urge you to take every precaution to protect your Personal Data when you are on the Internet.

Our website may contain links to other websites operated by third parties. We are not responsible for the privacy practices of websites operated by third parties that are linked to our website. We encourage you to learn about the privacy policies of such third party websites. Some of these third party websites may be co-branded with our logo or trademark, even though they are not operated or maintained by us. Once you have left our website, you should check the applicable privacy policy of the third party website to determine how they will handle any information they collect from you.

Who We May Disclose Your Personal Data to

Generally, we shall protect and keep confidential your personal data. We will disclose your personal data only with your consent and for purposes that you have been informed about. However, subject to applicable laws, we may disclose your personal data for the purposes set out above to parties such as those described below:

- a) Related corporations;
- b) Banks, financial institutions, credit card companies and their respective service providers;
- b) Companies providing services relating to insurance and/or reinsurance to us, and associations of insurance companies;
- c) Agents, contractors or third party service providers who provide services to us such as telecommunications, information technology, payment, data processing, storage and archival;
- d) Our professional advisers such as our auditors and lawyers; and
- e) Regulators and authorities.

When we disclose your personal data to third parties, we will ensure that they are contractually bound to protect your personal data in accordance with applicable laws and regulations, save in cases where your personal data is shared with governmental agencies and regulators, or where your personal data is publicly available, or where use/disclosure of your personal data is otherwise legally mandated and exempted.

If your personal data has to be transferred overseas, we will, where legally required, inform you of the extent to which your personal data will be protected, in the foreign jurisdiction(s) to which it will be transferred.

How Long We Keep Your Personal Data For

We shall store your personal data for as long as necessary to fulfil the purposes for which such data was collected, our business purposes, our internal and legal needs or as is otherwise legally required.

Contacting Us - Queries, Access/Correction Requests and Withdrawal of Consent

If you:

- a) Have queries about our data protection processes and practices;
- b) Wish to request access to and/or make corrections to your personal data in our possession or under our control; or
- c) Wish to withdraw your consent to our collection, use or disclosure of your personal data;

Please submit a written request (with supporting documents, if any) to our PDP Officer at:

Email : dpo@pilgrimpartnersasia.com
Tel : +65 6557 2073
Write in : Personal Data Protection (PDP) Officer
Pilgrim Partners Asia (Pte.) Ltd.
137 Telok Ayer Street
#04-07
Singapore 068602

Our PDP Officer shall strive to respond to you within 30 days of your submission. Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may also result in the termination of any agreement you may have with us. Our legal rights and remedies are expressly reserved in such event.