

**Daiwa Capital Markets Singapore Limited Privacy Notice**

This Notice describes how Daiwa Capital Markets Singapore Limited (“**DCMSL**”, “us”, we” or “our”) manages Personal Data (described below) which is subject to the Personal Data Protection Act (No. 26 of 2012) of Singapore (“**PDPA**”). In the course of our business, DCMSL processes information about individuals, including Personal Data about our prospective, current and former clients (“**you**”). Please ensure that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or applying for any products or services offered by us, you agree and consent to DCMSL, its affiliates and related corporations, as well as their respective representatives and/or agents (collectively, the "**Daiwa Group**"), collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Daiwa Group’s authorized service providers and relevant third parties in the manner described in this Notice, as amended, updated or supplemented from time to time.

**1 What does this Notice cover?**

This Notice applies to any and all forms of use (“**processing**”) of Personal Data by us in Singapore if you are a former, current or prospective client of DCMSL. In this Notice, “Personal Data” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access, including data in our records as may be updated from time to time.

**2 What types of Personal Data do we collect?**

For prospective clients with whom we have not yet made contact, we may collect (to the extent permitted by applicable law):

- Personal identification details (such as name, address, gender, nationality), contact information (such as telephone, e-mail address), and family details (such as marital status);
- information related to the professional profile (such as directorship / positions and professional networks) and information related to company ownership and financial background.

For former and current clients or prospective clients with whom we are taking steps to enter into a contractual relationship, we collect (to the extent permitted by applicable law):

- personal details such as your name, identification number, date of birth, compliance related documents (including a copy of your national identity card or passport), phone number, address and domicile electronic address, and family details such as the name of your spouse or partner;
- financial information, including payment and transaction records and information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where relevant, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use, including electronic interactions across various channels such as e-mails and mobile applications;
- any records of phone calls between you and DCMSL, specifically phone log information such as your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, partner or account number, including identifiers for accounting purposes;
- when you access DCMSL websites or our applications, data transmitted by your browser or device you are using and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your device, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our Website if

their disclosure is made voluntarily, e.g., in the course of a registration or request). When you visit a DCMSL website, that website may contain additional information about how we use your information while you are visiting that website; and

- in some cases (where permitted by law), special categories of Personal Data, such as your biometric information, political opinions or affiliations, health information, racial or ethnic origin, religious or philosophical beliefs, and, to the extent legally possible, information relating to criminal convictions or offences.

In some cases, we collect this information from public registers (which, depending on the product or service you receive and the country of the Daiwa Group entity with which you have a contractual relationship, may include beneficial ownership and other registers), public administration or other third-party or public sources, such as wealth screening services, credit reference agencies, fraud prevention agencies, intermediaries that facilitate data portability, and other Daiwa Group entities.

We might also collect certain of the above Personal Data types in relation to your business relationship, such as your additional account holders, business partners (including other shareholders, or beneficial owners), dependants or family members, representatives or agents. Where you are an institutional or corporate client or investor, we may also collect information about your directors, representatives, employees, shareholders, or beneficial owner. Before providing DCMSL with this information, you should provide a copy of this Notice to those individuals.

### **3 For which purposes do we process your Personal Data and what legal basis do we rely on?**

#### **3.1 Purposes of processing**

We always process your Personal Data for a specific purpose and only process the Personal Data which is relevant to achieve that purpose. In particular, we process Personal Data, within applicable legal limitations, for the following purposes:

- a) Client Onboarding. For example:
  - to verify your identity and assess your application (including the need for guarantees or other securitisation tools) if you apply for credit.
  - to conduct legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud). For more details, please see Section e) below.
- b) Client Relationship Management. For example, to:
  - manage our relationship with you, including communicating with you in relation to the products and services you obtain from us, other Daiwa Group entities and from our business partners, handling customer service-related queries and complaints, facilitating debt recovery activities, making decisions regarding credit or your identity, tracing your whereabouts, and closing your account (in accordance with applicable law) if it remains dormant and we are unable to contact you after a period of time;
  - help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving, including profiling based on the processing of your Personal Data, for instance by looking at the types of products and services that you use from us, how you like to be contacted.
- c) Product implementation and execution. For example, to:
  - provide products and services to you and ensure their proper execution, for instance by ensuring that we can identify you and make payments to and from your accounts in accordance with your instructions and the product terms;
  - perform underwriting.
- d) Engaging in prospecting and business development and / or protecting and enhancing the DCMSL and/or Daiwa Group brand. For example, to:
  - evaluate whether and how DCMSL may offer products, services and events that may be of interest to you;

- contact you for direct marketing purposes about products and services we think will be of interest to you, including those offered by us, other Daiwa Group entities, and our other business partners, and facilitating competitions and promotions.
- e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation. For example, to:
- carry out legal and regulatory compliance checks as part of the onboarding process, including to comply with anti-money laundering regulations and fraud prevention;
  - meet our on-going regulatory and compliance obligations (e.g., laws of the financial sector, anti- money laundering and tax laws), including in relation to recording and monitoring communications, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime;
  - receive and handle complaints, requests or reports from you or third parties made to designated units within DCMSL or the Daiwa Group;
  - reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority;
  - prevent and detect crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
  - undertake transactional and statistical analysis, and related research.
- f) Supporting, Enhancing and Maintaining our technology. For example, to:
- take steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing products and services or learn about other products and services we can provide.
- g) Other purposes. For example:
- for the Daiwa Group's prudent operational management (including credit and risk management, technological support services, reporting, insurance, audit, systems and products training and administrative purposes);
  - to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of DCMSL's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
  - to collect data to ensure the security of buildings as well as property and information located or stored on the premises, to prevent, and if necessary, investigate unauthorized physical access to secure premises (e.g., maintaining building access logs and CCTV system images);
  - testing and calibrating analytical models. In such case, pseudonymized data are used as far as possible;
  - to exercise our duties and/or rights vis-à-vis you or third parties.

### 3.2 Basis for processing of Personal Data

Depending on the purpose of the processing activity (see Section 3.1), the legal basis for the processing of your Personal Data will be one of the following:

- necessary to perform our contractual obligations towards you or to enter into or conclude a contract with you or for carrying out our obligations under such a contract;
- necessary to comply with our legal or regulatory obligations that are required by law, such as tax reporting requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as responding to an emergency that threatens the health or safety of the individual or another natural person;
- necessary for business improvement purposes to the extent permitted under the PDPA, such as to improve new processes for business operations in relation to DCMSL's services;
- where we have obtained your prior consent;
- necessary for one or more of the specific purposes deemed by law to be in the legitimate interests of organisations (PDPA, First Schedule, Part 3, Para 2-10 - "**Prescribed**

**Legitimate Interests**”). Some of these Prescribed Legitimate Interests which are necessary for DCMSL include the following:

- i. for investigation or proceedings (including the establishment, exercise or defence of a legal claim);
  - ii. for DCMSL to obtain legal services.
- necessary for the general legitimate interests of DCMSL, without unduly affecting your interests or fundamental rights and freedoms (PDPA, First Schedule, Part 3, Para 1 - **“General Legitimate Interests”**). Examples include processing necessary to:
    - i. manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving (with the exception of direct marketing, i.e., sending of unsolicited marketing material for which we would obtain your consent);
    - ii. evaluate whether and how DCMSL may offer products, services and events that may be of interest to you;
    - iii. prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of DCMSL premises;
    - iv. receive and handle complaints, requests or reports from you or third parties made to designated units within DCMSL or the Daiwa Group;
    - v. take steps to improve our products and services and our use of technology and to conduct market research;
    - vi. cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
    - vii. make disclosures for the purposes referred to in Section 5 below, such as providing products and services and assuring a consistently high service standard across the Daiwa Group, and keeping our clients, employees and other stakeholders satisfied.

#### **4 How do we protect Personal Data?**

All DCMSL employees accessing Personal Data must comply with our internal rules and processes in relation to the processing of your Personal Data to protect them and ensure their confidentiality. DCMSL and the Daiwa Group have also implemented adequate technical and organisational measures to protect your Personal Data against unauthorised, accidental or unlawful destruction, loss, alteration, misuse, disclosure or access and against all other unlawful forms of processing.

#### **5 Who has access to Personal Data and with whom are they shared?**

##### **5.1 With DCMSL and the Daiwa Group**

We may share Personal Data with other Daiwa Group companies in order to ensure a consistently high service standard across our group, and to provide services and products to you.

##### **5.2 Outside DCMSL and the Daiwa Group**

When providing products and services to you, we may share Personal Data with persons acting on your behalf. For the purposes listed in section 3.1 above, and to the extent permitted under applicable law, we may also transfer Personal Data to third parties outside DCMSL and the Daiwa Group, such as:

- A potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of DCMSL’s business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- Third party service providers, who are contractually bound to confidentiality, such as IT system or hosting providers, cloud service providers, database providers, consultants (e.g., lawyers, tax accountants), and other goods and services providers;
- Authorities, e.g., regulators, enforcement or exchange body or courts or party to proceedings where we are required to disclose information by applicable law or regulation or at their request, or to safeguard our legitimate interests;
- Other credit, financial services, comparable institutions or other recipients to whom we transfer Personal Data in order to conduct business. In particular: (i) when providing products and services to you, to persons acting on your behalf or otherwise involved in the transaction (depending on the type of product or service you receive from us), including, where relevant the following types of companies: a party acquiring interest in, or assuming risk in or in

connection with, the transaction (such as an insurer); or (ii) issuers of securities (including third parties appointed by them) in which you have an interest, where such securities are held by third party banks for you; (iii) payment recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks (including custodian banks); (iv) clearing houses, and clearing or settlement systems and specialised payment companies or institutions such as SWIFT; (v) other banks, market/transaction counterparties (including broker to whom we have executed a give-up agreement with), upstream withholding agents, swap or trade repositories, stock exchanges; (vi) any third-party fund fiduciary administrator or asset manager who provides services to you; (vii) other financial institutions, credit reference agencies or credit bureaus (for the purpose of obtaining or providing credit references); and (viii) any introducing broker to whom we provide introductions or referrals;

- Any legitimate recipient required by applicable laws or regulations.

Where DCMSL or the Daiwa Group transfers your data to third party service providers processing data on DCMSL or the Daiwa Group's behalf, we take steps to ensure they meet our data security standards, so that your Personal Data remains secure. Third party service providers are asked to comply with a list of technical and organisational security measures, irrespective of their location, including measures relating to: (i) information security management; (ii) information security risk assessment and (iii) information security measures (e.g., physical controls; logical access controls; malware and hacking protection; data encryption measures; backup and recovery management measures).

### **5.3 Data transfers to other countries**

The Personal Data transferred within or outside DCMSL and the Daiwa Group as set out in Sections 5.1 and 5.2, is in some cases also processed in other countries. We only transfer your Personal Data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission to the extent recognized by the competent Data Protection Authority or another statutory exemption) provided by local applicable law. As detailed in sections 4 and 5.2 above, DCMSL and the Daiwa Group ensure that their third-party service providers take steps to implement, technical and organisational measures to safeguard your Personal Data against unauthorized processing.

A list of the countries in which DCMSL and the Daiwa Group operate can be found at <https://www.daiwa-grp.jp/english/about/group/>.

## **6 How long do we store your data?**

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on its purpose.

As far as necessary, we will keep your data for the duration of our banking relationship subject to applicable legal and regulatory requirements. In addition, we might process your data after the termination of our banking relationship for operational purposes in accordance with the applicable laws as well as pursuant to various retention and documentation obligations.

However, if you wish to have your Personal Data removed from our databases, you can make a request as described in Section 7 below, which we will review as set out therein.

## **7 What are your rights and how can you exercise them?**

### **7.1 Your rights**

You have a right to access and to obtain information regarding your Personal Data that we process. If you believe that any information we hold about you is incorrect or incomplete, you may also request the correction of your Personal Data. You also have the right to withdraw your consent where DCMSL obtained your consent to process Personal Data (without this withdrawal affecting the lawfulness of any processing that took place prior to the withdrawal).

DCMSL will honour such requests, withdrawal or objection as required under applicable data protection rules but these rights are not absolute: they do not always apply and exemptions may be

engaged. We will usually, in response to a request, ask you to verify your identity and/or provide information that helps us to understand your request better. If we do not comply with your request, we will explain why.

## **7.2 Exercising your rights**

To exercise the above rights, please send an e-mail to [DPO@sg.daiwacm.com](mailto:DPO@sg.daiwacm.com). If you are not satisfied with how DCMSL processes your Personal Data, we would like to discuss it with you to understand how we can rectify the issue. If you would like to speak to us about our use of your Personal Data, you can contact DCMSL's Data Protection Officer by emailing [DPO@sg.daiwacm.com](mailto:DPO@sg.daiwacm.com).

If you are not satisfied with DCMSL's response, you have the right to make a complaint to the Data Protection Authority. The contact details of the Data Protection Authority can be found at the following website: <https://www.pdpc.gov.sg>.

## **8 Changes to your Personal Data**

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please inform us of the change as soon as possible.

## **9 Updates to this Notice**

We reserve the right to amend, vary or supplement this Notice it from time to time. Any amendment or update to this Notice we will make available to you on the DCMSL website. Please visit the DCMSL website frequently to understand the current Notice, as the terms of this Notice are closely related to you. All communications, transactions and dealings with us shall be subject to the latest version of this policy in force at the time.