

PRIVACY POLICY

Havenport Investment Pte Ltd (“**Havenport**” or as appropriate in the context, “**we**”; “**us**”; or “**our**”) is an integrated asset management and wealth solutions provider. In addition to managing Asia Pacific ex Japan equities, for institutions and individuals, we offer our wealth solutions via our internet resource portal at www.havenportwealth.com (subject to other additions) (the “**Portal**”) (together with the Portal, referred to as the “**Services**”).

Havenport respect the protection of the Personal Data of individuals and value the relationship we have with you. This Personal Data Policy (“**Privacy Policy**”) is applicable to any data processing implemented by Havenport and the Portal.

This Privacy Policy describes the types of Personal Data we may collect from you, how we may use that information, and with whom we may share it. Our Privacy Policy also describes the measures we take to protect the security of the Personal Data you provide to us, including without limitation through the Portal. We also tell you how you can reach us to update your Personal Data, ask questions you may have about our personal data protection practices and provide feedback on our personal data protection practices.

BY SUBMITTING YOUR INFORMATION, SIGNING UP ON THE PORTAL AND/OR OTHER CONFIRMATION, YOU ARE CONFIRMING THAT YOU ARE BOUND BY THIS PRIVACY POLICY. BY USING THE SERVICES OR BY OTHERWISE GIVING US YOUR INFORMATION, YOU WILL BE DEEMED TO HAVE READ, UNDERSTOOD AND AGREED TO THE PRACTICES AND POLICIES OUTLINED IN THIS PRIVACY POLICY AND YOU HEREBY CONSENT TO OUR COLLECTION, USE AND DISCLOSURE OF YOUR INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY. WE RESERVE THE RIGHT TO CHANGE, MODIFY, ADD OR DELETE PORTIONS OF THE TERMS OF THIS PRIVACY POLICY, AT OUR SOLE DISCRETION, AT ANY TIME.

IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY AT ANY TIME, DO NOT USE ANY OF THE SERVICES OR GIVE US ANY OF YOUR INFORMATION. IF YOU DO NOT PROVIDE US WITH SOME OR ALL OF THE INFORMATION REQUESTED BY HAVENPORT OR WITHDRAW YOUR CONSENT TO HAVENPORT COLLECTING AND USING YOUR PERSONAL DATA AND INFORMATION, HAVENPORT WILL BE UNABLE TO PROVIDE OR CONTINUE TO PROVIDE YOU WITH OUR SERVICES.

IF YOU USE THE SERVICES ON BEHALF OF SOMEONE ELSE (SUCH AS YOUR CHILD) OR AN ENTITY (SUCH AS YOUR EMPLOYER), YOU REPRESENT THAT YOU ARE AUTHORISED BY SUCH INDIVIDUAL OR ENTITY TO (I) ACCEPT THIS PRIVACY POLICY ON SUCH INDIVIDUAL’S OR ENTITY’S BEHALF, AND (II) CONSENT ON BEHALF OF SUCH INDIVIDUAL OR ENTITY TO OUR COLLECTION, USE AND DISCLOSURE OF SUCH INDIVIDUAL’S OR ENTITY’S INFORMATION AS DESCRIBED IN THIS PRIVACY POLICY.

SECTION 1: WHY THIS PRIVACY POLICY

This Privacy Policy is published in compliance with the Personal Data Protection Act (2012) of Singapore (the “PDPA”).

The objectives of this Policy are to:

- Provide a set of privacy and personal data protection standards that govern our procedures and protect the privacy of your personal data.
- Demonstrate our on-going commitment to protecting your privacy and addressing any privacy concerns that you might have.
- Describe the ways in which we collect, use, disclose and retain your personal data.
- Ensure that we comply with the PDPA.
- Facilitate our compliance with any further developments in the protection of personal data.

SECTION 2: TYPE OF PERSONAL DATA

Generally, some of the Services require us to know who you are so that we can best meet your needs. When you sign-up on the Portal, access the Services, complete a transaction, verify your credit card, place an order, or through any interaction with us via application or registration forms, emails, telephone calls, short messaging services (“SMS”), texts or other correspondence, we may ask you to voluntarily provide us with certain information that personally identifies you or could be used to personally identify you.

Without prejudice to the generality of the above, information collected by us from you may include (but is not limited to) the following:

- (a) contact data (name, NRIC, passport or other identification number, telephone number(s), mailing address, email address, personal interests, and any other information provided us in any forms you may have submitted to us, interaction with Havenport and its agents/employees, or through opening an account with Havenport);
- (b) other information that you voluntarily choose to provide to us (such as information shared by you with us through emails);
- (c) financial information such as bank accounts, credit and debit card details or other payment instrument details;

- (d) information received by body corporate under lawful contract or otherwise;
- (e) your use of our Services, including data of investment history, volume, patterns, predictions, trends;
- (f) email and telephone call data records;
- (g) photographs, video and CCTV footage;
- (h) your use of the Portal and Services, including cookies, IP address, policy and usage history information; and
- (i) your usage of and interaction with our Portal and/or services including computer and connection information, device capability, bandwidth, statistics on page views, and traffic to and from our Portal.

The information collected from you by Havenport may constitute Personal Data under the PDPA.

“Personal Data” is defined under the PDPA to mean any data, whether true or not, about an individual who can be identified from that data or from that data and other information to which an organisation has or is likely to have access. This would include, without limitation, information such as name, address, telephone number, e-mail address, credit card details and any other personal information.

Havenport will be free to use, collect and disclose information that is freely available in the public domain without your consent.

Information that is business contact information such as your name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about you, which are not provided by you for personal purposes, will not be regarded as Personal Data under the PDPA. Your consent to us collecting, using and disclosing any business contact information will not be required.

SECTION 3: COLLECTION OF PERSONAL DATA

Personal Data may be collected by us through processes including, but not limited to the following:

- (a) when a user signs-up or registers on our Portal with us for an account;
- (b) when you access our Portal or perform an online transaction;
- (c) when you interact with any of our employees (including our fund managers, customer service officers);
- (d) when customer submits an application to us to purchase our products or use our Services;

- (e) when a customer asks to be included in an email or other mailing list;
- (f) when an individual requests that we contact him/her;
- (g) when an individual responds to our marketing initiatives; and
- (h) when individual submits his/her Personal Data to Havenport for any other reason.

Information that you submit via any of our Portal or application forms shall be deemed to be collected by us with your permission. Such information may include but is not limited to your name, contact and fax numbers, home, work and email addresses, bank account and investment details, credit card details, including the three-digit code that appears on the back of your credit card, date of birth, gender and lifestyle information and other information necessary to the provision of Services.

Data collected by automated means

Various technologies may be used on our Portal or our emailing system in order to make it more user-friendly, effective and secure. Such technologies may lead to data being collected automatically by us or by third parties on behalf of us. This data does not generally, but may, contain a user's personal data. These technologies include but are not limited to cookies, web beacons, tracing links, click stream data and web analytics. 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 web sites. Please see Section 7: Additional Privacy Statements for Portal and Service Users.

SECTION 4: CONSENT TO COLLECTION OF PERSONAL DATA

Havenport shall not collect, use or disclose your personal data unless:

- (a) you give, or are deemed to give, consent to the collection, use or disclosure of your personal data; or
- (b) the collection, use or disclosure of your personal data without your consent is required or authorised under the PDPA or other written law.

Havenport shall not, as a condition of providing a product or service to you, require you to consent to the collection, use or disclosure of your personal data beyond what is reasonable to provide the product or Service to you.

Havenport shall not obtain or attempt to obtain your consent for collecting, using or disclosing personal data by providing false or misleading information with respect to the collection, use or disclosure of your personal data, or use deceptive or misleading practices.

As part of our continuous effort to keep you informed on our new product and services, we may mail, email,

telephone and contact you by any other means. Information sent to you may also include upcoming special events, seminars or other relevant information that may be of interest to you.

You will always have the option to decline any or all of these communications by following the directions included in our emails or other communications, or by contacting the Data Protection Officer of Havenport directly (see Section 18 below).

Havenport may collect and use personally identifiable information that you volunteer, or other behavioural data and big data generated. In addition to that, permission will be deemed given for communication from us that are necessary to fulfil transactions and services requested by you.

Photographs, videos and CCTV footage may constitute personal data if an identifiable individual is captured. Havenport will either seek your written consent for the collection, use and disclosure of photographs, videos and/or CCTV footage of you, or state in the invitation to you of an event/launch, that photographs/videos/CCTV footage will be taken at the event/launch for publicity on Havenport's print and electronic media. Appropriate and obvious notices shall also be put up at the reception or entrance of our event/launch to inform attendees on the event/launch day.

SECTION 5: PURPOSES FOR WHICH WE COLLECT AND USE PERSONAL DATA

Havenport may collect, use or disclose your personal data only for purposes:

- (a) that a reasonable person would consider appropriate in the circumstances; and
- (b) where you have been informed in accordance with this Section 5 of this Privacy Policy, to the extent applicable.

Havenport collects and uses the Personal Data that you provide to us depending on your relationship with us (e.g. as a prospect, account holder, or as a business partner to Havenport, or others).

In General

In general, Havenport may collect, use and/or disclose your Personal Data for the following purposes:

- (a) maintaining records of Havenport's interactions with you, through telephone recordings, documentation (hard copy and electronic), and
- (b) internal reporting and analysis related to Havenport's business operations;
- (c) responding to your queries and requests and handling complaints;

- (d) updating you on developments in our services and special happenings;
- (e) managing commercial and financial risks, including preventing, detecting and investigating crime, including fraud and any form of financial crime;
- (f) assessing and processing any applications, requests and instructions for products and services offered by Havenport;
- (g) analysing your financial situation and determining financial strategies and products suitable for you as our client;
- (h) evaluating your standing, resources and capabilities to enter or maintain a relationship with you as a client, business partner or other;
- (i) establishment and maintenance of relationship with Havenport and/or within Havenport's related companies or affiliates;
- (j) marketing and promotion activities of Havenport;
- (k) taking of photographs and/or videos (whether by our staff or third party photographers and/or videographers) during events or seminars organised by Havenport, its related companies and/or its affiliates for publicity purposes;
- (l) if consented to in the application form and/or other methods of consent notification, providing marketing, advertising and promotional information via postal mail, electronic mail, SMS or MMS, fax and/or voice calls;
- (m) any other purposes which Havenport may inform you of in writing from time to time, but for which Havenport will seek your separate consent; and
- (n) any other purposes related to the above purposes.

If you are a Prospect or Account Holder

If you are a Prospect or Account Holder, Havenport may collect, use and/or disclose your Personal Data for the following purposes:

- (a) creating a prospect list for prospect administration, and/or for the maintenance of your account;
- (b) performing or updating transactions on your account;
- (c) carrying out your instructions or responding to any enquiries from you;
- (d) dealing in any matters relating to your accounts (including the mailing or dispatch of correspondence and other document to you, which may disclose certain personal data about you on envelopes and/or packages);

- (e) managing your relationship with Havenport;
- (f) compiling statistics for company or industry exercises and studies, to design and improve Havenport's products and services for you;
- (g) compliance monitoring and audit reviews;
- (h) complying with all applicable regulations and laws, including carrying out due diligence or other screening activities (including background checks) in accordance with legal or regulatory obligations or risk management procedures that may be required by law or that may have been put in place by Havenport;
- (i) providing general information on, marketing and promotion of product enhancements and Havenport's services, which are relevant to your needs;
- (j) investigating fraud, misconduct, any unlawful action or omission, whether relating to your account, your transactions or any other matter relating to your account, and whether or not there is any suspicion of the aforementioned; and
- (k) archiving, backing-up or destroying personal data.

Marketing Purposes

Where you have specifically provided Havenport with additional consents, Havenport may also collect, use and/or disclose your Personal Data for the following purposes:

- (a) providing you benefit, including without limitation sending you details of products and services, either to our customers generally, or which may be of interest to you; and
- (b) matching your Personal Data with other data collected for other purposes and from other sources (including third parties) in connection with the provision or offering of products and services, whether by any Havenport company, or other third parties.

If you have provided your Singapore telephone number(s) and have indicated that your consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, Havenport may contact you using such Singapore telephone number(s) (including via voice calls, SMS, fax or other means) with information about Havenport's products and services.

SECTION 6: DISCLOSURE OF PERSONAL DATA

Havenport will only disclose Personal Data:

- (a) for the primary purpose for which it was collected as outlined in Section 5 above;
- (b) for purposes that a reasonable person will consider appropriate in the circumstances;
- (c) where you have consented; or
- (d) where permitted under the PDPA or other applicable law or if required by law.

Subject to applicable laws, Havenport may disclose your personal data for the purposes set out above to parties such as those described below:

- (a) Havenport's related companies and any of their branches and offices which may also include entities and activities overseas;
- (b) banks, financial institutions, credit card companies, payment gateways and their respective service providers;
- (c) companies providing services relating to insurance and/or reinsurance to us, and associations of insurance companies;
- (d) agents, contractors or third party service providers who provide services to us such as telecommunications, information technology, payment, data processing, storage and archival; and
- (e) our professional advisers such as our auditors and lawyers.

When Havenport discloses your personal data to third parties, Havenport will ensure that they are contractually bound to protect your personal data in accordance with applicable laws and regulations (as set out in herein), 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, Havenport 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.

In addition, Havenport would disclose Personal Data in the following circumstances:

- (a) in response to a request from law enforcement authorities or other government officials;
- (b) to comply with a court order or direction from a government agency or regulatory authority ordering the disclosure of the Personal Data; and
- (c) where the disclosure is necessary for investigations or legal proceedings.

SECTION 7: ADDITIONAL PRIVACY STATEMENTS FOR PORTAL AND SERVICE USERS

7.1 Persons who have visited and requested to be contacted by a Havenport representative on the Portal (“Prospect”) Note:

This section applies to all Prospects.

- i. As part of the signing-up process that is available to Prospects on the Portal, certain information, including Personal Data or sensitive personal information is collected from the Prospects.
- ii. All the statements in this Privacy Policy apply to all Prospects, and all Prospects are therefore required to read and understand the privacy statements set out herein prior to submitting any Personal Data or sensitive personal information to Havenport, failing which they are required to leave the Portal immediately.
- iii. If you have inadvertently submitted any such information to Havenport prior to reading the privacy statements set out herein, and you do not agree with the manner in which such information is collected, processed, stored, used or disclosed, then you may access, modify and delete such information by using options provided on the Portal. In addition, you can, by sending an email to dataprotectionofficer@havenport.com, inquire whether Havenport is in possession of your Personal Data, and you may also require Havenport to delete and destroy all such information.
- iv. Prospects’ personally identifiable information, which they choose to provide on the Portal when they sign up, is used to enable Prospects to describe/identify themselves and to establish a relationship with Havenport; request for more information from Havenport; register an Account if Prospect so decides; and if Prospect consents, for Havenport to inform Prospect about portal content updates, any of Havenport’s new products and other updates. Other information that does not personally identify the Prospects as an individual, is collected by Havenport from Prospects (such as, your computer’s internet protocol (IP) address which provides us with information that helps us learn about your browser and operating system) and is exclusively owned by Havenport. Havenport may also use such information in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, and may sell or otherwise transfer such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. In particular, Havenport reserves with it the right to use anonymized Prospect demographics information for the following purposes:
 - (a) Analyzing software usage patterns for improving product design and utility.
 - (b) Analyzing such information for research and development of new technologies.

- (c) Using analysis of such information in other commercial product offerings of Havenport.
- (d) Sharing analysis of such information with third parties for commercial use.
- v. The Portal uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by Havenport and its service providers for the technical administration of the Portal, research and development, and for Prospect administration. In the course of serving advertisements or optimizing services to Prospects, Havenport may allow authorized third parties to place or recognize a unique cookie on the Prospect's browser. The cookies however, do not store any Personal Data of the Prospect. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use the Portal, but may be limited in the use of some of the features.
- vi. Havenport will communicate with the Prospects through email, telephone and notices posted on the Portal or through other means available through the service, including SMSs, text and other forms of messaging. The Prospects can change their e-mail and contact preferences at any time by sending an email to dataprotectionofficer@havenport.com.
- vii. Havenport may keep records of electronic communications and telephone calls received and made for making appointments or other purposes for the purpose of administration of Services, Prospect support, research and development.
- viii. All Havenport employees and data processors, who have access to, and are associated with the processing of sensitive personal data or information, are obliged to respect the confidentiality of every Prospects' Personal Data or sensitive personal information.
- ix. To the extent necessary to provide Prospects with the Services, Havenport may provide their Personal Data to third party contractors who work on behalf of or with Havenport to provide Prospects with such Services, to help Havenport communicate with Prospects or to maintain the Portal. Generally, these contractors do not have any independent right to share this information, however certain contractors who provide services on the Portal, including the providers of online communications services, may use and disclose the personal information collected in connection with the provision of these Services in accordance with their own privacy policies. In such circumstances, you consent to us disclosing your personal information to contractors, solely for the intended purposes only.
- x. Prospects may choose to unsubscribe from marketing communications that they receive from Havenport by clicking the 'unsubscribe' link provided at the end of every such promotional communication.

7.2 Persons who register and have accounts to use the Portal ("Account Holders") Note:

This section applies to all Account Holders.

- i. Accordingly, a condition of each Account Holder's use of and access to the Portal and the Services is their acceptance of the terms of this Privacy Policy. Any Account Holder that does not agree with any provisions of the same has the option to discontinue the Services provided by Havenport immediately.
- ii. All the information provided to Havenport by an Account Holder, including Personal Data or any sensitive personal information, is voluntary. You understand that Havenport may use certain information of yours, which has been designated as Personal Data under the PDPA, (a) for the purpose of providing you the Services, (b) for commercial purposes and in an aggregated or non-personally identifiable form for research, statistical analysis and business intelligence purposes, (c) for sale or transfer of such research, statistical or intelligence data in an aggregated or non-personally identifiable form to third parties and affiliates. Havenport also reserves the right to use information provided by or about the Account Holder for the following purposes:
 - (a) Publishing such information on the Portal.
 - (b) Contacting Account Holders for offering new products or services
 - (c) Contacting Account Holders for taking product and Service feedback.
 - (d) Analyzing software usage patterns, trends, history, big data for our business operations, improving product design and utility.
 - (e) Analyzing anonymized practice information for our commercial use.

If you have voluntarily provided your Personal Data to Havenport for any of the purposes stated above, you hereby consent to such collection and use of such information by Havenport.

- iv. Collection, use and disclosure of information which has been designated as Personal Data under the PDPA requires your express consent. By affirming your assent to this Privacy Policy, you provide your consent to such use, collection and disclosure as required under applicable law. Our Services may be unavailable to you in the event such consent through an email is not given.
- v. Havenport does not control or endorse the content, messages or information found in any Services and, therefore, Havenport specifically disclaims any liability with regard to the Services and any actions resulting from your participation in any Services, and you agree that you waive any claims against Havenport relating to same, and to the extent such waiver may be ineffective, you agree to release any claims against Havenport relating to the same.
- vi. You are responsible for maintaining the accuracy of the information you submit to us, such as your contact information provided as part of account registration. If your personal information changes, you may correct, delete inaccuracies, or amend information by making the change on our member information page or by contacting us at dataprotectionofficer@havenport.com. We will make good faith efforts to make requested changes in our then active databases as soon as reasonably

practicable. If you provide any information that is untrue, inaccurate, out of date or incomplete (or becomes untrue, inaccurate, out of date or incomplete), or Havenport has reasonable grounds to suspect that the information provided by you is untrue, inaccurate, out of date or incomplete, Havenport may, at its sole discretion, discontinue the provision of the Services to you. There may be circumstances where Havenport will not correct, delete or update your Personal Data, including (a) where the Personal Data is opinion data that is kept solely for evaluative purpose; and (b) the Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

- vii. You may choose to unsubscribe from marketing communications that you receive from Havenport by clicking the 'unsubscribe' link provided at the end of every such promotional communication.
- viii. If you wish to cancel your account or request that we no longer use your information to provide you Services, contact us at dataprotectionofficer@havenport.com. We will retain your information for as long as your account with the Services is active and as needed to provide you the Services. We shall not retain such information for longer than is required for the purposes for which the information may lawfully be used or is otherwise required under any other law for the time being in force. After a period of time, your data may be anonymized and aggregated, and then may be held by us as long as necessary for us to provide our Services effectively, but our use of the anonymized data will be solely for analytic purposes. Please note that your withdrawal of consent, or cancellation of account may result in Havenport being unable to provide you with its Services or to terminate any existing relationship Havenport may have with you.
- ix. If you wish to opt-out of receiving non-essential communications such as promotional and marketing-related information regarding the Services, please send us an email at dataprotectionofficer@havenport.com.
- x. Havenport may require the Account Holder to pay with a credit card, wire transfer, debit card or cheque for Services for which subscription amount(s) is/are payable. Havenport will collect such Account Holder's credit card number and/or other financial institution information such as bank account numbers and will use that information for the billing and payment processes, including but not limited to the use and disclosure of such credit card number and information to third parties as necessary to complete such billing operation. Verification of credit information, however, is accomplished solely by the Account Holder through the authentication process. Account Holder's credit-card/debit card details are transacted upon secure sites of approved payment gateways which are digitally under encryption, thereby providing the highest possible degree of care as per current technology. However, Havenport provides you an option not to save your payment details. Account Holder is advised, however, that internet technology is not full proof safe and Account Holder should exercise discretion on using the same.
- xi. Due to the communications standards on the Internet, when a Prospect or an Account Holder or anyone who visits the Portal, Havenport automatically receives the URL of the site from which anyone visits. Havenport also receives the Internet Protocol (IP) address of each Account Holder's computer

(or the proxy server an Account Holder used to access the World Wide Web), Account Holder's computer operating system and type of web browser the Account Holder is using, email patterns, as well as the name of Account Holder's ISP. This information is used to analyse overall trends to help Havenport improve its Service. The linkage between Account Holder's IP address and Account Holder's personally identifiable information is not disclosed to third parties. Notwithstanding the above, Havenport may disclose some of the aggregate findings (not the specific data) in anonymized form (i.e., non-personally identifiable) with advertisers, sponsors, investors, strategic partners, and others in order to help grow its business.

- xii. The Portal uses temporary cookies to store certain data (that is not sensitive personal data or information) that is used by Havenport and its service providers for the technical administration of the Portal, research and development, and for Account Holder administration. In the course of serving advertisements or optimizing services to its Account Holders, Havenport may allow authorized third parties to place or recognize a unique cookie on the Account Holder's browser. The cookies however, do not store any Personal Data of the Account Holder. You may adjust your internet browser to disable cookies. If cookies are disabled you may still use the Portal, but may be limited in the use of some of the features.
- xiii. This Privacy Policy applies to Services that are owned and operated by Havenport. Havenport does not exercise control over the sites displayed as search results or links from within its Services. These other sites may place their own cookies or other files on the Account Holder's computer, collect data or solicit personal information from the Account Holder, for which Havenport is not responsible or liable. Accordingly, Havenport does not make any representations concerning the privacy practices or policies of such third parties or terms of use of such websites, nor does Havenport guarantee the accuracy, integrity, or quality of the information, data, text, software, sound, photographs, graphics, videos, messages or other materials available on such websites. The inclusion or exclusion does not imply any endorsement by Havenport of the website, the website's provider, or the information on the website. If you decide to visit a third party website linked to the Portal, you do this entirely at your own risk. Havenport encourages the Account Holder to read the privacy policies of that website.
- xiv. Havenport does not collect information about the visitors of the Portal from other sources, such as public records or bodies, or private organisations, save and except for the purposes of registration of the Account Holders (the collection, use, storage and disclosure of which each User must agree to in order for Havenport to effectively render the Services).
- xv. Havenport maintains a strict "No-Spam" policy, which means that Havenport does not intend to sell, rent or otherwise give your e-mail address to a third party without your consent.
- xvi. Havenport has implemented best international market practices and security policies, rules and technical measures to protect the Personal Data that it has under its control from unauthorised access, improper use or disclosure, unauthorised modification and unlawful destruction or accidental loss. However, for any data loss or theft due to unauthorized access to the Account Holder's

electronic devices through which the Account Holder avails the Services, Havenport shall not be held liable for any loss whatsoever incurred by the Account Holder.

- xvii. Havenport implements reasonable security practices and procedures and has a comprehensive documented information security programme and information security policies that contain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of Havenport's business. The reasonable security practices and procedures implemented by Havenport include, but not limited to: ensuring that any Personal Data is protected by password.
- xviii. Havenport takes your right to privacy very seriously and other than as specifically stated in this Privacy Policy, will only disclose your Personal Data in the event it is required to do so by law, rule, regulation, law enforcement agency, governmental official, legal authority or similar requirements or when Havenport, in its sole discretion, deems it necessary in order to protect its rights or the rights of others, to prevent harm to persons or property, to fight fraud and credit risk, or to enforce or apply the terms under this Privacy Policy.
- xix. Havenport takes all reasonable steps to ensure that all unsolicited information is destroyed immediately.

SECTION 8: SHARING AND TRANSFER OF PERSONAL DATA

In general, the third-party providers used by us, such as data intermediaries and aggregators, will only collect, use and disclose your information to the extent necessary to allow them to perform the services they provide to us.

In the course of or in connection Havenport's business operations, which includes, providing products and services to customers, Havenport may transfer Personal Data to the following parties for the following purposes:

- (a) To Havenport's related companies and/or affiliates;
- (b) To government and non-government authorities, agencies and/or regulators as required under law or under directions or orders from the government and non-government authorities, agencies and/or regulators for security, regulatory approvals or permits;
- (c) Financial institutions or payment gateways for purposes of payment processing and transactions related to Havenport's provision of products and services;
- (d) Other service providers who provide IT and outsourcing services such as electronic mail services, deployment of management operations for information technology and HR outsourcing services; and

(e) Professional, financial and legal advisors, tax advisors, auditors, insurers and insurance brokers.

However, certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information we are required to provide to them for your purchase-related transactions.

For these providers, we recommend that you read their privacy policies so you can understand the manner in which your personal information will be handled by these providers.

In particular, remember that certain providers may be located in or have facilities that are located a different jurisdiction than either you or us. So if you elect to proceed with a transaction that involves the services of a third-party service provider, then your information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located.

As an example, if you are located in Canada and your transaction is processed by a payment gateway located in the United States, then your personal information used in completing that transaction may be subject to disclosure under United States legislation, including the Patriot Act.

Once you leave our Portal(s) or are redirected to a third-party website or application, you are no longer governed by this Privacy Policy or our Portal's Terms of Service.

Havenport requires that the parties to whom we transfer Personal Data and our service providers implement adequate levels of protection in order to protect Personal Data. We also require that these parties only process Personal Data strictly for purposes for which we engage them for and consistent with the purposes that we have described in Section 5 "Purposes for which we collect and use Personal Data" or with other purposes for which consent has been sought and obtained.

SECTION 9: CONFIDENTIALITY AND SECURITY

Your Personal Data is maintained by Havenport in electronic form on its equipment, and on the equipment of its employees. Such information may also be converted to physical form from time to time. Havenport takes all necessary precautions to protect your personal information both online and off-line, and implements reasonable security practices, precautions and follow industry best practices to make sure it is not inappropriately lost, misused, accessed, disclosed, altered or destroyed, including certain managerial, technical, operational and physical security control measures that are commensurate with respect to the information being collected and the nature of Havenport's business.

No administrator at Havenport will have knowledge of your password. It is important for you to protect against unauthorized access to your password, your computer and your mobile phone. Be sure to log off from

the Portal when finished. Havenport does not undertake any liability for any unauthorised use of your account and password. If you suspect any unauthorized use of your account, you must immediately notify Havenport by sending an email to dataprotectionofficer@havenport.com. You shall be liable to indemnify Havenport due to any loss suffered by it due to such unauthorized use of your account and password.

Havenport makes all Personal Data accessible to its employees, agents or partners and third parties only on a need-to-know basis, and binds only its employees to strict confidentiality obligations.

Notwithstanding the above, Havenport is not responsible for the confidentiality, security or distribution of your personal information by our partners and third parties outside the scope of our agreement with such partners and third parties. Further, Havenport shall not be responsible for any breach of security or for any actions of any third parties or events that are beyond the reasonable control of Havenport including but not limited to, acts of government, computer hacking, unauthorised access to computer data and storage device, computer crashes, breach of security and encryption, poor quality of Internet service or telephone service of the Prospect and/or Account Holder etc.

SECTION 10: AGE OF CONSENT

By using the Portal, you represent that you are at least the age of 18 years old, or you have given us your consent to allow any of your minor dependents to use this site as the case may be.

Havenport strongly encourages parents and guardians to supervise the online activities of their minor children and consider using parental control tools available from online services and software manufacturers to help provide a child-friendly online environment. These tools also can prevent minors from disclosing their name, address, and other personally identifiable information online without parental permission. Although the Portal and Services are not intended for use by minors, Havenport respects the privacy of minors who may inadvertently use the internet or the mobile application.

SECTION 11: ACCURACY

Havenport will take reasonable efforts to ensure that any Personal Data collected is accurate and up to date by updating its records whenever changes to information come to its attention. Havenport will disregard information which seems, on a reasonable basis, to be inaccurate or out of date by reason of the time which has elapsed since it was collected or by reason of any other information in its possession.

SECTION 12: RETENTION OF PERSONAL DATA

Havenport only retains Personal Data for as long as the retention is required for the purposes for which we collected the Personal Data, the purposes described in this Policy and for our business and legal purposes. Generally, we do not retain Personal Data for a period of longer than six (6) years after the original purposes for which the Personal Data was collected have ceased to be applicable, unless otherwise required by law or other mandatory directions by court or government authorities or for purposes of legal proceedings or other similar proceedings or investigations.

SECTION 13: ACCESS AND WITHDRAWAL OF PERSONAL DATA

You may withdraw your consent to our continued use and disclosure of your Personal Data or seek access to your Personal Data (to a reasonable extent and as permitted by the Act) at any time by writing to our Data Protection Officer. You may also withdraw your consent for specific forms of communication and on specific communications via the unsubscribe options as stated on our email or other marketing messages.

In withdrawing your consent, you acknowledge that we may not be able to provide or continue providing certain goods and/or services to you and that we may cease such provision accordingly without any liability. Please note that it may take up to 30 working days for any request for consent withdrawal to be reflected in our systems.

We will, at your request, endeavour to provide you with an account of your Personal Data in our possession or control within a reasonable time. Such account shall be in respect of how your Personal Data has been or may have been generally used or disclosed within the year before the date of your request. We reserve the right to charge a reasonable administrative fee for carrying out your request.

There may be circumstances where Havenport will not correct, delete or update your Personal Data, including: (a) where the Personal Data is opinion data that is kept solely for evaluative purpose; and (b) the Personal Data is in documents related to a prosecution if all proceedings relating to the prosecution have not been completed.

SECTION 14: TRANSFER OF PERSONAL DATA OUTSIDE OF SINGAPORE

Certain Havenport's agents, vendors, or service providers may be operating outside Singapore. By providing information to us through our application forms, use of our Portal or otherwise, you are consenting to the transfer of that information to be processed and used in accordance with the terms of this Privacy Policy. In

such a situation, Havenport will ensure that the Personal Data so transferred will be accorded a standard of protection comparable to the protection provided under the PDPA.

SECTION 15: ACCURACY AND CORRECTION

You may request for information from Havenport on what Personal Data of yours we have and how we have used and shared your Personal Data during the last one (1) year before the date of your request.

We will endeavour to ensure that your Personal Data we use is sufficiently accurate and complete in making any decision that impacts you.

To help us maintain the accuracy of your Personal Data, we encourage you to inform us when there are any changes to your Personal Data which you have provided us by writing to our Data Protection Officer. We will correct or complete your Personal Data as soon as reasonably practicable. If you have any concerns, feedback or complaints about the use and/or sharing of your Personal Data, you may contact us at dataprotectionofficer@havenport.com.

SECTION 16: DO NOT CALL PROVISIONS

Havenport shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number without first checking with the Do Not Call Registry established by the Personal Data Protection Commission ("PDPC") and receiving confirmation from the PDPC that such Singapore telephone number is not listed on the Do Not Call Register.

Havenport shall not, and shall ensure that its agents shall not, send a specified message to a Singapore telephone number, unless the specified message includes clear and accurate information identifying the person sending the specified message and/or the specific Havenport company, and such person's and/or such Havenport company's contact information.

The prescribed duration within which Havenport must check with the Do Not Call Registry before sending a specified message to a Singapore telephone number will be 30 days. You may continue to receive marketing messages and other product information from Havenport within the prescribed validity period.

Havenport shall not make, cause or authorise a voice call addressed to a Singapore telephone number that conceals or withholds, or that has the effect of concealing or withholding, the calling line identity from the recipient.

Havenport will not require an Account Holder or users of a Singapore telephone number to consent to the

sending of a specified message beyond what is reasonable for Havenport to provide its products, courses and services. Havenport will not obtain or attempt to obtain such consent by:

- (a) providing false or misleading information; or
- (b) using deceptive or misleading practices.

If an Account Holder or user of a Singapore telephone number gives notice withdrawing consent for the sending of a specified message to that number, then Havenport shall cease (and cause its agents to cease) sending specified messages to that number. Such withdrawal of consent shall be without prejudice to and does not limit or derogate from Havenport's rights to collect, use and/or disclose the Account Holder's or user's personal data, in this case, pursuant to the applicable terms and conditions governing his/her relationship with Havenport and under the law.

SECTION 17: CHANGES TO THIS PRIVACY POLICY

Havenport may update this Privacy Policy at any time, with or without advance notice. In the event there are significant changes in the way Havenport treats your personally identifiable information, or in the Privacy Policy itself, Havenport will display a notice on the Portal or send you an email, as provided for above, so that you may review the changed terms prior to continuing to use the Services. As always, if you object to any of the changes to our terms, and you no longer wish to use the Services, you may contact us at dataprotectionofficer@havenport.com. Unless stated otherwise, Havenport's current Privacy Policy applies to all information that Havenport has about you and/or your account.

If a Prospect or Account Holder uses the Services; or accesses the Portal after a notice of changes has been sent to such Prospect or Account Holder, or published on the Portal, such Prospect or Account Holder hereby provides his/her/its consent to the changed terms.

SECTION 18: HOW TO CONTACT US

Should you have questions about this Privacy Policy or Havenport's information collection, use and disclosure practices, or if you would like to access, correct, amend or delete any personal information we have about you, register a complaint, or simply want more information contact us at dataprotectionofficer@havenport.com. We will use reasonable efforts to respond promptly to any requests, questions or concerns, which you may have regarding our use of your personal information. If you have any grievance with respect to our use of your information, you may communicate such grievance to:

Attention to: Data Protection Officer

Havenport Investments Pte Ltd

1 George Street, #10-01, Singapore 049145

Phone: +65 6590 9468 (Ask to be connected to Data Protection Officer)

Email: dataprotectionofficer@havenport.com

Effective date: October 1, 2016

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