

ABN AMRO CLEARING BANK N.V., SINGAPORE BRANCH
DATA PROTECTION POLICY

The purpose of this document ("Data Protection Policy") is to inform you of how ABN AMRO CLEARING BANK N.V., Singapore branch manages personal data which is subject to the Personal Data Protection Act 2012 of Singapore ("Act"). Please take a moment to read this Data Protection Policy so 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, signing up for any products or services offered by us, or by your continued employment with us, you agree and consent to ABN AMRO CLEARING BANK N.V., Singapore Branch (including its head office, branches, related corporations and business units) (collectively, the "Companies"), as well as their respective agents (collectively referred to herein as "ABN AMRO", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consents you may have previously provided to ABN AMRO in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies may have at law to collect, use or disclose your personal data.

ABN AMRO may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time on our website at <https://www.abnamro.com/clearing/en/what-we-do/information/customer-disclosures-asia-pacific> and https://assets.ctfassets.net/1u811bvgvthc/3OHNNriCKHoRDLoGfChTov/d3e55c1deb4e49a201cff311428066a5/Singapore_Annex_Disclosure_document.pdf. Please check back regularly for updated information on the handling of your Personal Data.

For the avoidance of doubt, this Data Protection Policy forms a part of the terms and conditions governing your relationship with us ("**Terms and Conditions**") and should be read in conjunction with those Terms and Conditions.

1. **Personal Data**

- 1.1 In this Data Protection Policy, "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.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, NRIC, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. **Collection of Personal Data**

- 2.1 Generally, we collect Personal Data in the following ways:
- (a) when you submit forms or applications to us;
 - (b) when you submit queries or requests to us;
 - (c) when you submit a complaint or provide feedback;
 - (d) when you respond to our request for additional Personal Data;
 - (e) when you ask to be included in an email or other mailing list;
 - (f) when you respond to our initiatives; and
 - (g) when you submit your Personal Data to us for any other reasons.
- 2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not at our website automatically collect Personal Data, including your email address, unless you provide such information or log in with your account credentials.
- 2.3 If you provide us with any Personal Data relating to a third party (e.g. information of your dependent, spouse, children and/or parents), by submitting such information to us, you represent to us that you have obtained the consent of that third party to you providing us with their Personal Data for the respective purposes.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to fulfil your requests and/or applications.

3. **IP Address**

3.1 An IP address is a number that was automatically assigned to your computer when you signed up with an Internet Service Provider.

3.2 When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which the IP address you are using to access our website has been issued, however we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws or regulations.

4. **Information on Cookies**

4.1 A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information.

4.2 The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser.

4.3 Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

5. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

5.1 **Generally**, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:

- (a) responding to your queries and requests;
- (b) processing your instructions;
- (c) managing the administrative and business operations of ABN AMRO and complying with internal policies and procedures;
- (d) facilitating business asset transactions (which may extend to any mergers, acquisitions or asset sales) involving ABN AMRO;
- (e) verification of identity and validating authorised signatories in signed documentation;
- (f) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (g) resolving complaints and handling requests and enquiries;
- (h) preventing, detecting and investigating crime, including fraud and money-laundering, and analyzing and managing commercial risks;
- (i) maintaining security of ABN AMRO premises (including but not limited to CCTV surveillance);
- (j) managing ad hoc projects and initiatives;
- (k) generating reports and analytics in relation to our products and services;
- (l) meeting or complying with any applicable rules, laws, regulations, codes of practice, guidelines issued by any legal or regulatory bodies, or other legal process and law enforcement requirements which are binding on ABN AMRO (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- (m) legal purposes (including but not limited to drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution); and
- (n) purposes which are reasonably related to the aforesaid.

5.2 **In addition**, ABN AMRO collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship with you:

- (a) If you are a Private Banking customer, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:
 - (i) assessing your application for any of our products and services and verifying your financial standing through credit checks;
 - (ii) opening or continuation of accounts and establishing or providing banking services and facilitating the continuation or termination of the banking relationship (including but not limited to customer onboarding, account maintenance, account closure and archiving documents);
 - (iii) facilitating the daily operation of services and credit facilities;
 - (iv) providing client servicing (including but not limited to remittance services, mailing services,

- reconciliation services, submission of proxy forms and providing customer satisfaction services);
 - (v) facilitating the transfer of funds within ABN AMRO bank accounts or from ABN AMRO bank accounts to external bank accounts and vice versa;
 - (vi) reviewing client portfolios and ensuring the ongoing credit worthiness of customers;
 - (vii) managing investment products and settlement of trades (including but not limited to seeking approval for credit, construction of investment proposal, preparation of term sheets, provision of treasury and foreign exchange products and services, confirmation of trades and conducting risk assessments);
 - (viii) providing referrals to service providers (including but not limited to insurance brokers);
 - (ix) providing you with the products and services which you have requested for example, processing transactions, cash deposits and withdrawals and providing loans and overdraft facilities (including but not limited to the evaluation of credit risks and enforcement of repayment obligations); and
 - (x) purposes which are reasonably related to the aforesaid.
- (b) If you are the owner, chairman, director, employee, mandatee, or guarantor of an organisation that is a customer or prospective customer, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:
- (i) assessing your application for any of our products and services and verifying your financial standing through credit checks;
 - (ii) establishing or providing you with our banking and/or clearing and settlement services;
 - (iii) opening or continuation of accounts and facilitating the continuation or termination of the banking and/or clearing and settlement relationship (including but not limited to customer onboarding, account maintenance, account closure and archiving documents);
 - (iv) facilitating the daily operation of services and credit facilities;
 - (v) providing client servicing (including but not limited to remittance services, mailing services, reconciliation services and providing customer satisfaction services);
 - (vi) facilitating the transfer of funds or financial products within ABN AMRO bank accounts or from ABN AMRO bank accounts to external bank accounts and vice versa;
 - (vii) reviewing client portfolios ensuring the ongoing credit worthiness of customers;
 - (viii) managing investment products and settlement of trades (including but not limited to seeking approval for credit, construction of investment proposal, preparation of term sheets, provision of treasury and foreign exchange products and services, confirmation of trades and conducting risk assessments);
 - (ix) arranging and structuring debt products and providing advisory on liquidity matters;
 - (x) providing hedging products and services;
 - (xi) facilitating the provision of syndicated loans;
 - (xii) networking to maintain customer relationship (including but not limited to communicating with banks and sovereign wealth funds);
 - (xiii) providing referrals to service providers (including but not limited to insurance brokers);
 - (xiv) providing you with the products and services which you have requested for example, processing transactions and the providing of loans and overdraft facilities (including but not limited to the evaluation of credit risks and enforcement of repayment obligations); and
 - (xv) purposes which are reasonably related to the aforesaid.
- (c) If you are a counterparty to a transaction (for example, a beneficiary of a fund transfer or payment) or a contractual agreement, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:
- (i) providing cash and transactional services;
 - (ii) drafting and reviewing of contracts and agreements; and
 - (iii) purposes which are reasonably related to the aforesaid.
- (d) If you are an employee or owner of an external service provider of ABN AMRO, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:

- (i) managing and evaluating project tenders;
 - (ii) processing and payment of vendor invoices; and
 - (iii) purposes which are reasonably related to the aforesaid.
 - (e) If you submit an application to us as a candidate for an employment or representative position, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:
 - (i) conducting interviews;
 - (ii) processing your application (including pre-recruitment checks involving your qualifications);
 - (iii) providing or obtaining employee references and for background screening;
 - (iv) processing employment pass applications, visa applications and offer of employment;
 - (v) evaluating and assessing your suitability for the position applied for; and
 - (vi) any other purposes reasonably related to any of the above.
 - (f) If you are a dependent of an existing employee of ABN AMRO, ABN AMRO collects, uses and discloses your Personal Data for the following purposes:
 - (i) applying for dependent passes;
 - (ii) applying for long term social visit passes;
 - (iii) applying for and with respect to any insurance policy for employees and their dependents that is provided by ABN AMRO;
 - (iv) managing payroll, child care and/or family leave entitlement purposes; and
 - (iii) purposes which are reasonably related to the aforesaid.
- 5.3 In addition, where permitted under the Act, ABN AMRO may also collect, use and disclose your Personal Data as follows:
- (a) conducting analytics of our products and services;
 - (b) organising promotional and corporate events;
 - (c) sending newsletters;
 - (d) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you (including but not limited to cross selling and telemarketing);
 - (e) providing services, products and benefits to you, including promotions, loyalty and reward programmes;
 - (f) leads generation and management;
 - (g) providing cross-referrals to other members of the ABN AMRO; and
 - (h) conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.
- 5.4 If you have provided your Singapore telephone number(s) and have indicated that you consent to receiving marketing or promotional information via your Singapore telephone number(s), then from time to time, ABN AMRO may contact you using such Singapore telephone number(s) (including via voice calls, text, fax or other means) with information about our products and services (including discounts and special offers).
- 5.5 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.
6. **Disclosure of Personal Data**
- 6.1 Your Personal Data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your Personal Data may be disclosed :
- (a) to entities within ABN AMRO and our related corporations;
 - (b) to companies and brokers providing insurance products and services;
 - (c) to agents, contractors or third party service providers who provide operational services to ABN AMRO, such as courier services, telecommunications, information technology, payment, payroll, processing, training

- market research, storage, archival or other services to ABN AMRO;
- (d) to recipients of bank reference letters;
 - (e) to any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving ABN AMRO;
 - (f) to external banks, credit card companies and their respective service providers;
 - (g) to our professional advisers such as financial advisors, tax advisors, auditors and lawyers;
 - (h) to relevant government regulators, statutory boards, authorities, law enforcement agencies, securities exchanges, central banks, or other similar agencies and authorities to comply with any laws, rules, court orders, guidelines and regulations or schemes imposed by any governmental authority (such as the Monetary Authority of Singapore, Singapore Exchange Limited, the Accounting and Corporate Regulatory Authority, and the Insolvency and Public Trustee Office) in each case to which ABN AMRO and/or our related corporations are subject, whether in Singapore or worldwide;
 - (i) to counterparties, billing organisations and their respective banks in relation to fund transfers and payments;
 - (j) to financial institutions and intermediaries such as correspondent banks, brokers, central counterparties, clearing houses, exchanges and markets involved in transactions you make;
 - (k) to surveyors or valuers in relation to loan facilities like mortgages;
 - (l) to brokerage houses, fund houses, registrars, custodians, external banks and investment vehicles in relation to asset management and investment product settlement processing;
 - (m) to collection and repossession agencies in relation to the enforcement of repayment obligations for loans;
 - (n) to credit reporting agencies;
 - (o) to external business, referral and charity partners in relation to banking privileges, gift redemptions, loans and corporate promotional events;
 - (p) to marketing agencies, event planners, event venue providers, contractors, vendors, and related persons in relation to events which ABN AMRO may organise;
 - (q) as permitted under the Terms and Conditions applicable to you or to the organisation that is a banking customer of ABN AMRO that you are the owner, chairman, director, employee, mandatee, or guarantor of, and
 - (r) to any other party to whom you authorise us to disclose your Personal Data to.

7. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

7.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records, please contact ABN AMRO as follows:

Email : DL-AACB-SG-DPO@abnamroclearing.com

Write in: 182 Cecil Street, #23-01 Frasers Tower, Singapore 069547

7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, ABN AMRO may not be in a position to continue to provide its products or services to you, administer any contractual relationship in place, may be considered a termination by you of any contractual relationship which you may have with ABN AMRO, and your being in breach of your contractual obligations or undertakings, and ABN AMRO's legal rights and remedies in such event are expressly reserved.

7.3 Please note that if your Personal Data has been provided to us by a third party (e.g. The Central Depository Pte Ltd), you should contact that party to make such queries, complaints, and access and correction requests to ABN AMRO on your behalf.

----- *End of Data Protection Policy* -----