

# PERSONAL DATA PROTECTION PRIVACY POLICY

Aris PrimePartners Asset Management Pte. Ltd. (“APAM or the “Company”) recognizes the importance and sensitivity of Personal Data.

## PERSONAL DATA

As required under the Singapore Personal Data Protection Act (“PDPA”) of Singapore, this statement is to inform you how APAM manages Personal Data (as defined below) about you or individuals who are connected or associated with you including but not limited to your directors or legal representatives, shareholders, partners and /or beneficial owners (“Associated Persons”) in accordance with this Privacy Policy. The types of personal data collected may include:

- a. Personal contact data including company or contact name, date of birth, signature, telephone and other contact numbers, email address, country of residence and/or of birth, residential and/or correspondence address;
- b. Curriculum vitae, occupation or other employment details, education and income levels;
- c. Identification or passport number and information or documents that may be used for the verification of identity;
- d. Information on assets, bank account and securities custody or trading account(s) and other information relating to your financial circumstances;
- e. Any other personal data reasonably required in order for us to provide the services requested by you; and
- f. Any other personal data permitted by or required to comply with any applicable laws and regulations and internal control and compliance policies of the Company,

(collectively referred to as “Personal Data”).

## 1. SOURCES OF INFORMATION

The Personal Data has and/or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

- a. information provided or submitted by you through among others, your dealings and agreements with the Company;
- b. as applicable, publicly available or publicly accessible information; and
- c. any written or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

As the accuracy of your Personal Data depends largely on the information you provide to us, kindly inform us as soon as practicable if there are any errors in the Personal Data or if there have been any changes to the Personal Data. The Company intends to keep the Personal Data accurate and up-to-date, and retains the Personal Data no longer than necessary for the purposes defined below or as required or permitted by applicable law.

If you provide APAM with any Personal Data relating to a third party (e.g. information on your spouse, children, parents, and/or employees), you represent to APAM that you have obtained the necessary

consent of such third party to you providing APAM with their Personal Data for the respective purposes. You should ensure that all Personal Data is complete, accurate, true and correct.

## **2. USE OF PERSONAL DATA**

We will collect, use, process, disclose and/or transfer the Personal Data that you have provided to us for the following purposes, including but not limited to the following (“Purpose”):

- a. verifying your identity or the identities of Associated Persons;
- b. assessing and processing any applications or requests made by you for services and/or products offered by APAM;
- c. advising or acting for you on matters stated in our mandate, subscription or other agreement(s) with you;
- d. compliance with applicable laws, regulations, legal or regulatory requirements, directives, codes of conduct, notices and guidelines from time to time as well as internal control policies of the Company;
- e. responding to your queries and requests and handling complaints;
- f. managing and facilitating the administrative and business operations of APAM and complying with internal policies and procedures (including financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes);
- g. complying with applicable Know-Your-Client, anti-money laundering, tax evasion and anti-terrorist financing laws, regulations and rules;
- h. any other reasonable purposes in connection with the provision of our services;
- i. fulfilling any purpose directly related to the above purposes; and/or
- j. any other purposes that are appropriate or authorised by applicable law.

In addition to the above, APAM may have also specifically notified you of any other purposes which APAM collects, uses or discloses your Personal Data in relation to specific services or in your dealings with APAM. You agree and consent to APAM collecting, using and disclosing your Personal Data for these additional purposes as well.

## **3. DISCLOSURE OF PERSONAL DATA**

All Personal Data held by the Company will be kept confidential and protected but the Company may provide such information to the following parties, where such disclosure is necessary to satisfy the Purpose, or a directly related purpose, for which the data was collected:

- a. any officer or employee of the Company and its related companies;
- b. any agent, representative or third party service provider (and their sub-contractors) of the Company;

- c. government or regulatory authorities, statutory bodies or authorities or enforcement agencies, including any government departments or other appropriate governmental or regulatory authorities in Singapore or elsewhere such as the Monetary Authority of Singapore;
- d. any professional adviser or consultant to or engaged by you or the Company or any third party which may assist us in carrying out the purposes laid out above in this Privacy Policy;
- e. our vendors and business partners as well as any agent, contractor or service provider who provides administrative, information technology or other services necessary to the operation of our business;
- f. your authorised representatives and any other party to whom you authorise APAM to disclose Personal Data to;
- g. any person to whom we are, in our belief in good faith, under an obligation to make disclosure as required by any applicable law.

The Company maintains the necessary physical, technical and organizational security measures to protect the Personal Data and will exercise reasonable due diligence in the selection of its third party service providers, and require that they maintain adequate technical and organizational security measures to safeguard the Personal Data, and to process the Personal Data only as instructed by the Company and for no other purposes.

#### **4. RIGHTS OF ACCESS, RECTIFICATION AND OBJECTION**

You or your Associated Persons (as the case may be) have the right to request access to Personal Data which you or your Associated Persons have previously provided which we hold, to request the rectification of any inaccurate data, as well as to object, at any time, to the processing of the Personal Data for legitimate reasons. To exercise such rights, please see below.

If you provide the Company with personal data in respect of an Associated Person, it is your responsibility to inform your Associated Person and obtain their consent to the processing and transfer of their personal data by the Company as described in this Privacy Policy, as well as about their rights of access, rectification and objection and you warrant and undertake to obtain such consent.

#### **5. CONTACTING US**

If you have any questions or requests relating to this Privacy Policy or your Personal Data, please contact our Data Protection Officer at: [compliance@arisprime.com](mailto:compliance@arisprime.com).

#### **6. GOVERNING LAW**

This Privacy Policy is governed by and construed in accordance with the laws of Singapore.