

## PRIVACY NOTICE

THIS NOTICE APPLIES TO YOU ONLY IF YOU ARE LOCATED OR RESIDING IN SINGAPORE.

(VISTRA TRUST (SINGAPORE) PTE LTD, VISTRA TRUST CORPORATION (SINGAPORE) LTD, VISTRA CORPORATE TRUST (SINGAPORE) LTD, VISTRA CORPORATE SERVICES (SEA) PTE LTD, VISTRA ALTERNATIVE INVESTMENTS (SINGAPORE) PTE LTD, VISTRA SERVICES (SINGAPORE) PTE LTD) (collectively “Vistra”)

Effective Date: from 25 May 2018

Last Updated Date: 24 June 2019

This Privacy Notice explains how particular companies in the Vistra Group collect, use, disclose or otherwise process your personal data, and your rights in relation to the personal data it holds with regard to the Singapore Personal Data Protection Act 2012 (“PDPA”) only.

This Privacy Notice applies to personal data in our possession or under our control, including personal data in the possession of organisations which we have engaged to collect, use, disclose or process personal data for our purposes.

Vistra (in this Privacy Notice, “us”, “we” and “our”) is the data controller of your personal data and is subject to the PDPA and being part of the Vistra Group, the EU General Data Protection Regulation 2016/679 (the “GDPR”). If you have any questions about how we treat your personal data with regards to the GDPR, kindly visit the following link: <https://www.vistra.com/privacy-notice>

Our Privacy and Data Compliance Officer (data protection officer, “DPO”) is contactable by email at: [SGDataprotection@vistra.com](mailto:SGDataprotection@vistra.com)

This Privacy Notice supersedes any previous Privacy Notice or equivalent which you may have been provided with or seen prior to the Effective Date stated above.

### Personal data

As used in this Privacy Notice:

“personal data” means data, whether true or not, about a customer 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.

### How we collect your personal data

We collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet us;
- From information about you provided to us by your company or an intermediary;
- When you communicate with us by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;

- When you complete (or we complete on your behalf) client on-boarding or application or other forms;
- From other companies in the Vistra Group;
- From your agents, representatives, advisers, intermediaries, and custodians of your assets;
- From publicly available sources or from third parties, most commonly where we need to conduct background checks about you.

## **The categories of personal data we collect**

We collect the following categories of personal data about you:

- Your name and contact information such as your home or business address, email address and telephone number;
- Biographical information which may confirm your identity including your date of birth, tax identification number and your passport number or national identity card details, country of domicile and/or your nationality, country of tax residency;
- Information relating to your financial situations such as income, expenditure, assets and liabilities, sources of wealth, as well as your bank account details;
- Information about your knowledge and experience in the investment field;
- An understanding of your goals and objectives in procuring our services;
- Information about your employment/business, education, family or personal circumstances, and interests, where relevant; and
- Information to assess whether you may represent a politically exposed person or money laundering risk.

## **The basis for processing your personal data (other than with your consent), how we use that personal data and whom we share it with**

### **(i) Performance of a contract with you**

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract.

In this respect, we use your personal data for the following:

- To prepare a proposal for you regarding the services we offer;
- To provide you with the services as set out in our Terms of Engagement with you or as otherwise agreed with you from time to time;
- To deal with any complaints or feedback you may have;
- For any other purpose for which you provide us with your personal data. In this respect, we may share your personal data with or transfer it to the following:
- Your agents, advisers, intermediaries, and custodians of your assets who you tell us about;
- Third parties whom we engage to assist in delivering the services to you, including other companies in the Vistra Group (in or outside of Singapore);
- Our professional advisers where it is necessary for us to obtain their advice or assistance, including lawyers, accountants, IT or public relations advisers;

- Other third parties such as intermediaries who we introduce to you. We will wherever possible tell you who they are before we introduce you;
- Our data storage providers

## **(ii) Legitimate interests**

We also process your personal data because it is necessary for our legitimate interests, or sometimes where it is necessary for the legitimate interests of another person.

In this respect, we use your personal data for the following:

- For marketing to you. In this respect, see the separate section on Marketing below;
- Training our staff or monitoring their performance;
- For the administration and management of our business, including recovering money you owe to us, and archiving or statistical analysis;
- Seeking advice on our rights and obligations, such as where we require our own legal advice;

In this respect we will share your personal data with the following:

- Our advisers or agents where it is necessary for us to obtain their advice or assistance;
- With third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.

## **(iii) Legal obligations**

We also process your personal data for our compliance with a legal obligation which we are under.

In this respect, we will use your personal data for the following:

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws;
- As required by tax authorities or any competent court or legal authority

In this respect, we will share your personal data with the following:

- Our advisers where it is necessary for us to obtain their advice or assistance;
- Our auditors where it is necessary as part of their auditing functions;
- With third parties who assist us in conducting background checks;
- With relevant regulators or law enforcement agencies where we are required to do so.

## **Marketing**

We will send you marketing about similar services we provide, as well as other information in the form of alerts, newsletters and invitations to events or functions which we believe might be of interest to you. We will communicate this to you in a number of ways including by post, telephone, email, SMS or other

digital channels. If you object to receiving marketing from us at any time, please contact the DPO or unsubscribe.

## **Withdrawing your consent**

The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is being withdrawn by you in writing. You may withdraw consent and request us to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above by submitting your request in writing or via email to our DPO.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same, including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within thirty (30) business days of receiving it.

Whilst we respect your decision to withdraw your consent, please note that depending on the nature and scope of your request, we may not be in a position to continue providing our goods or services to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws.

## **Access to and correction of Personal Data**

If you wish to make (a) an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data, or (b) a correction request to correct or update any of your personal data which we hold about you, you may submit your request in writing or via email to our DPO.

## **Protection of Personal Data**

To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have introduced appropriate administrative, physical and technical measures such as up-to-date antivirus protection, encryption, use of privacy filters, and disclosing personal data both internally and to our authorised third party service providers and agents only on a need-to-know basis.

You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

## **Retention of your data**

We will only retain your personal data for as long as we have a lawful reason to do so. In particular:

- where we have collected your personal data as required by anti-money laundering legislation, including for identification, screening and reporting, we will retain that personal data for five years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings; or
- otherwise, we will in most cases retain your personal data for a period of seven years after the termination of our contractual or other relationship with you in case any claims arise out of the provision of our services to you.