

Appendix C to the Terms of Business

Investcorp Asia Financial Services Pte. Ltd. (“Investcorp”, “we”, “us”, and “our”) has created this privacy statement to demonstrate our commitment to protecting your personal data in accordance with the Personal Data Protection Act 2012 (No. 26 of 2012) (“PDPA”) and other applicable data protection laws. Your right to privacy and data security is a primary concern. This privacy statement sets out the basis on which any information we collect from you, or that is provided to us, will be processed by us.

Please find below further information regarding the data you provide us and your rights in relation to the provision of such data.

1. INFORMATION GATHERING AND USAGE

Why personal data is used

We intend to give you as much control as reasonably possible over your personal data. Personal data refers to data about you that can be used to identify you, either from that data alone or along with other information to which we have or are likely to have access (such as your name, email address, telephone numbers, postal address, credit card information, etc.) There are times when we may need to collect and process personal data from you in order to provide you with the services that you have requested from us. Set out below is a non-exhaustive list of the types of personal data we might collect from you and the purposes for which we would use it.

- **Client onboarding, and maintenance:** We collect information in relation to know your client (“KYC”) compliance checks prior to effecting your investments to enable us to identify and verify the identity of prospective clients in accordance with anti-money laundering regulations. We also conduct KYC checks from time to time to ensure the information we hold on you is up-to-date. This may include your name, title, date of birth, passport copy, National Registration Identification Card (NRIC) number / Foreign Identification Number (FIN) / passport number, driving license (or other government identification documents), address, email, phone number, nationality, citizenship, marital status, tax details, board information (i.e., directorships), income, salary, source of funds, academic record (including degrees and schooling), licenses, and professional memberships.
- **Providing services to you:** We collect information to enable us to market and deliver existing and new services to you, process your transactions, provide you with investor reports about your portfolio of investments, etc. This may include bank details, transaction history, investing preferences, investment history, risk tolerance, and wire transfer instructions.
- **Special events:** We may collect information from you when we organize special events to which you subscribe, to enable us to better service your needs during your attendance at such events. We may take photographs at our events and it is possible that such photographs will include your image. We take such photographs for use in promotional materials for

future events and we may upload these photographs (along with your other personal data) to our website or microsites that we create for such events and/or as part of press releases or social media posts.

- **Compliance with legal or regulatory obligations:** We collect information in relation to compliance with our legal and regulatory reporting obligations. This may include executed share purchase agreements, transaction histories, certifications related to FATCA/CRS or other tax reporting requirements, etc.
- **Visitors to our offices:** If you visit our offices we will collect information about you (such as your name and contact details, details of your appointment and the relevant Investcorp team members you are meeting, and the time and date of your visit) to enable us to verify your identity, record the fact of your visit for security and health and safety purposes, and to provide you with our secure access cards so that you can move around the building during your visit.
- **Managing disputes or claims:** We may process your personal information only as is necessary for the purpose of establishing, exercising or defending a legal claim or otherwise resolving a dispute. Such information may pertain to the services we provide to you or in connection with your account with us. In connection with any such processing (including disclosures of information) your personal information will be minimized and only disclosed where necessary in connection with the dispute or claim.
- **Internal business management.** We may process your personal information for internal business management and resource allocation purposes.
- **Statistical use.** We may aggregate or anonymize your personal information so that it can no longer identify you, for the purpose of allowing us to analyze client information for strategic and statistical purposes.

(The purposes set out above are collectively referred to herein as “Purposes”.)

We may collect personal information from you when we need this information in order to provide a service to you. In such instances, failure to provide your personal data may mean that we are not able to provide services you requested.

If you provide personal data of any third party to us, you represent and warrant that you have obtained the necessary consent from that third party to share and transfer his/her personal data to us, and for us to collect, store, use and disclose that data in accordance with this privacy statement.

Where we process your personal information for direct marketing purposes, please be aware that you may object to our processing your personal data in this way at any time. If you do so, we will log your objection, stop processing your data for direct marketing

purposes, and we will not contact you again.

We do not perform any regular automated-decision activities, including profiling activities, where your personal data is processed by automated means, except as described above in relation to the use of cookies.

We will only process your personal data if and to the extent applicable law provides a lawful basis for us to do so and in particular: if you have consented to us doing so;

- i. if we need it to perform the contract we have entered into with you; or
- ii. if an exception to consent under the PDPA applies or we are otherwise authorised to do so under written law.

With whom personal data may be shared

- **Within Investcorp.** We may share the personal data that you provide to us to other entities in the Investcorp group for the abovementioned Purposes and to the extent necessary for the purpose of providing services to you.
- **To third parties.** We may share the personal data that you provide to us to our service providers for the abovementioned Purposes and for the purpose of providing services to you. This may include the provision of your personal data to IT service providers, fund and other administrators, marketing advisors, legal and other professional advisors and other service providers we may deal with from time to time. We may also provide your personal data to any successor to our business.
- **Photographs.** As noted above, we use photographs we take at events to promote future events. Such photographs may include your image where you attend an event and we may publish these photos (along with your other personal data) on our website, microsite, or as part of a press release or in a social media post.
- **Security.** Investcorp will also process your personal data for the purpose of ensuring office security and for health and safety purposes, including through the issuance of, and recording of information in connection with the use of, office ID/access cards.

We will not otherwise use, share, disseminate, publish or disclose your personal data (except as may be required in response to litigation, investigations or other legally required disclosures in accordance with the PDPA and other applicable laws).

2. WHERE WE STORE YOUR PERSONAL DATA

We may transfer your personal data to, or store it in, a destination outside of Singapore. This is because Investcorp group is a global business, with operations located in various jurisdictions, which uses service providers based in a number of locations worldwide. In some cases, your personal data will be stored in or transferred to jurisdictions outside of Singapore.

Where we have to transfer your personal data to third countries, we will use appropriate approved safeguards and ensure that the

recipient organisation is able to provide the transferred personal data with a standard of protection comparable to that under the PDPA.

For further information please do not hesitate to contact us using the details below.

Period for which we store your personal data

We will store your personal data for only so long as is necessary to fulfil the Purposes described above and in accordance with data retention periods prescribed by applicable laws and regulations.

Electronic newsletters

We may from time to time offer various free electronic newsletters. We do not spam, sell or rent email addresses. You may remove your address from our mailing lists by sending us an email.

3. YOUR RIGHTS

We rely on you to provide accurate, complete and current personal data to us.

Access. You may contact us at any time in order to request access to the personal information we hold about you. We will confirm whether we are processing your personal data, provide you with information about the ways in which your personal data may have been used, disclosed, stored or processed by us for the past year, provide details of the categories of personal data concerned and the reasons for our processing. We can also provide you with a copy of your personal information on request. We will facilitate the processing of your access request unless otherwise exempted under the PDPA.

Rectification. If the information we hold appears to be inaccurate we will not use it, and not allow others to use it, until it is verified. You can ask us to correct any error or omission or complete your personal data by contacting us at any time. To the extent possible, we will inform anyone who has received your personal data of any corrections we make to it. We will facilitate the processing of your correction request unless otherwise exempted under the PDPA.

Withdrawal of consent. You may, at any time, upon giving reasonable notice, communicate the withdrawal of your consent to the continued use, disclosure, storing and/or processing of your personal data for any of the Purposes as stated above by contacting us.

If you withdraw your consent to our use, disclosure, storing or processing of your personal data for the Purposes as stated above, we may not be able to continue to provide the services to you or perform on any contract we have with you, and we will not be liable in the event that we do not continue to provide the services to, or perform our contract with you.

Erasure. You may ask to have the information on your account deleted or removed. We will try to do so promptly, and, to the extent possible, we will inform anyone who has received your personal information of your request. However, we must keep track of certain transaction information, such as past purchases and similar information, for legal compliance purposes, so we may not be able to fully delete your information in certain circumstances.

Receiving/transferring your personal data. You may also ask us to send you the personal data we hold on you in an electronic, structured and user-friendly format, or you may ask us to send this data to another entity.

Automated decision-making. You have the right to be informed of any automated decision-making, including profiling, used in connection with your personal data, and we will provide information about the logic we apply, as well as the significance and consequences of such processing.

Complaints. You may contact us at any time where you believe that we are in breach of data protection law or where you wish to make a complaint about our data processing. Furthermore, if you are located in the EEA, you have the right to lodge a complaint with the relevant data protection supervisory authority in the country where you are based or any place in the EEA where you believe the infringement has occurred (or where you believe that we have not resolved an issue you have raised with us).

For any of the requests listed above, please contact us. We will make reasonable efforts to respond promptly and at the latest within one month. Our response to such requests may be limited to information under our direct control.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, if your request for access is excessive or unjustified, we may charge a reasonable fee.

4. SECURITY

Security measures

We limit access to personal data that we collect about you to

our employees and third-party agents, who we reasonably believe need to have access to your information to provide you with the information or services you request from us. We have security measures in place to help protect against the loss, misuse and alteration of the information under our control. While we cannot guarantee that loss, misuse or alteration to data will not occur, we ensure that our systems adhere to market security standard so as to help safeguard against such occurrences.

Where information is provided to us via our website, in certain areas the information passed between your browser and our system is encrypted with secure sockets layer (“SSL”) technology to create a protected connection between you and our Site to ensure confidentiality. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. We will use commercially acceptable means to protect your personal data, but we cannot guarantee its absolute security. If you have any questions about our security, you can email us.

Children’s privacy protection

Investcorp does not target and its websites are not intended for minors under the age of 18. Investcorp will not knowingly collect personal data from children, and will delete such data upon discovery. Where Investcorp requires personal data pertaining to children for the purpose of providing a service, the consent of an adult with parental responsibility for that child will be required.

5. OPTING OUT

If you do not wish to receive certain communications from us you may opt out by: (1) declining the service offered or (2) informing us that you no longer wish to receive such communications.

We will comply with such requests unless such communications from us are required by law or do not require your consent under applicable laws. Your opting out may restrict our ability to provide you with the full extent of our services.

6. CONTACT DETAILS

If you would like to get in touch with us with regards to your personal data, please contact our Data Protection Officer at:

Investcorp Holdings B.S.C.
Mr. Roberto Vianto
Email: rviano@Investcorp.com

7. CHANGES IN THIS PRIVACY STATEMENT

This Policy is accurate as at March 2020. Any changes we make to this privacy statement in the future will be posted on this page. We reserve the right to modify this privacy statement at any time, so please check back periodically to see any updates or changes to our privacy statement.

If we make material changes to this policy, we will notify you by email, or by means of a notice on Investcorp Holdings website home page.