

PRIVACY NOTICE

This website privacy notice (the “Privacy Notice”) describes how Trilake Partners Pte. Ltd. (“TLP”) and its related corporations and business units in Singapore treat information you may provide to us or that we may collect, including how we may use such information, how we protect the security of such information, and how you may change or request that we amend such information from our systems.

This includes any information relating to or associated directly with you (such as your name, title, email address or phone number) that is supplied to us in conjunction with your use or potential use of our website or in the context of our business activities, as well as information we generate regarding your use of the website (“Personal Information” or “Personal Data”).

We process Personal Data only in compliance with applicable data protection laws. The General Data Protection Regulation (“GDPR”) is a European regulation governing your rights in relation to your personal data, and how organizations should protect it.

This Privacy Notice supplements but does not supersede or replace any other consents you may have provided to us, or any other agreements that you may have with us, in respect of your Personal Data.

1) WHAT PERSONAL DATA DOES TLP COLLECT ABOUT ME?

Depending on the nature of our relationship with you, TLP may collect, process and use the following Personal Information about you:

- basic identification data, including your name and occupation;
- detailed identification data, including date of birth, place, district and country of birth, nationality, gender, bank account details, tax details, national Insurance number, passport details, and proof of identification for anti-money laundering and counter terrorism financing checks;
- contact details, including your business email address, business address, business landline and mobile telephone number;
- employment details, including your employment history, education background and income levels;
- investor profile data, including investment capital, investment experience, risk appetite, investment objectives and risks;
- information that you provide to us when you communicate to us through telephone and when you attend events or meetings with our involvement; and
- additional information that you provide to us in your email/contact form submission.

Furthermore, when you visit this website, we may use cookies and other technologies to automatically collect the following information:

- technical information, including your IP address, internet service provider’s domain name, your login information, browser type and version, device identifier, location and time zone

setting, browser plug-in types and versions, operating system and platform, page response times, and download errors;

- information about your visit, including the websites you visit before and after our website and pages you viewed or searched for, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouseovers) and methods used to browse away from the page.

We may also collect Personal Information from other sources. This may include information from publicly available sources, including third party agencies such as public database, registers and records.

2) WHY DOES TLP NEED TO COLLECT, PROCESS AND USE MY PERSONAL DATA?

Depending on the nature of our relationship with you, we collect and use your personal for a variety of reasons connected or relevant to our business, or to manage your relationship with us, such as:

- To communicate with you and respond to your enquiries (e.g., via email or online contact form);
- We use cookies and similar technologies on our website. We may also use these technologies to track your usage of the website so that we can improve our website. For more information, please see our Cookie Policy;
- To manage our commercial relationship with you or your organization;
- To communicate changes and development to our policies, terms and conditions and other administrative information;
- To carry out statistical analysis and market research;
- To comply with any applicable legal, tax or regulatory obligations imposed on us including company law, financial regulations, tax regulations, anti-money laundering and counter-terrorist financing legislation;
- To handle complaints and conduct and facilitate investigations and proceedings;
- To inform you of our latest developments, upcoming events and other marketing activities for the purpose of investor relations and communications; and

(a) Legal Basis to Process your Personal Information

We can only collect and use your Personal Information if we have a valid legal basis for doing so, and we are required to explain the various legal bases that we rely on to you. Our legal basis for collecting and using the Personal Information described above will depend on the Personal Information concerned and the specific context in which we collect it.

However, we will normally collect Personal Information from you:

- where we have your consent to do so;

- where we need the Personal information to perform a contract with you or to take steps at your request prior to such a contract being concluded;
- where we have a legal obligation to collect Personal Information from you or may otherwise need the Personal Information to protect your vital interests or those of another person;
- where the processing is in our legitimate interests in delivering client services or to improve our products and services, except where our interests are overridden by your rights.

Where we are not required to ask for your consent by law, we will only collect and use your Personal Information where this is necessary for our own legitimate business interests, which will be: to provide our services to you, respond to your queries, improve our website, undertake marketing, or for the purposes of detecting or preventing illegal activities.

We have taken into account your rights and interests in determining the scope and manner of the processing of information about you. When relying on the legitimate interests basis for processing your Personal Data, we will balance the legitimate interest pursued by us with your interest and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve the right balance.

You can choose not to provide Personal Information to us. However, unless otherwise indicated, the Personal Information that we request is necessary for the purposes of entering into and performing a contract with you or your organisation and/or providing services to you or your organisation and failure to provide it will impede the contracting process and/or the provision of the relevant services.

(b) Processing of aggregated data

TLP may also collect anonymised details about visitors to its website for the purposes of aggregate statistics or reporting purposes. However, no single individual will be identifiable from the anonymised details collected for these purposes.

(c) Sensitive or special categories of data

Different rules apply to data concerning race, ethnic origin, political opinions or beliefs, religious or other similar beliefs, trade union membership, physical or mental health, sexual life and any offences committed and sentences or court proceedings relating to actual or potential offences. This is what is known as sensitive or special categories of Personal Information. During our relationship with you, we should not require any such sensitive or special categories of Personal Information, therefore please do not send us such data as we will generally not need it to manage our relationship with you.

(d) Marketing Purposes

If you have given your consent, we may use your Personal Data for communication purposes, such as informing you of our latest developments, upcoming events and other marketing activities.

3) WHO MIGHT TLP SHARE MY PERSONAL INFORMATION WITH?

Your Personal Information is intended for TLP but may be shared with third parties in certain circumstances:

- Our service providers: We use other companies, agents or contractors to perform services on our behalf or to assist us in our operations. In particular, our website hosting services provider may be a recipient of Personal Information in order to host, manage and administer our website. In the course of providing such services, these service providers may have access to your Personal Information. However, we will only provide our service providers with Personal Information which is necessary for them to perform their services, and we require them not to use your information for any other purpose. We will use our best efforts to ensure that all our service providers keep your Personal Information secure.
- Regulators, authorities, and other third parties. In certain circumstances, we may be required to disclose or share your Personal Information in order to comply with a legal or regulatory obligation for example, we may be required to disclose Personal Information to the police, regulators, government agencies or to judicial or other authorities (e.g., tax). We may also disclose your Personal Information to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.
- Acquiring entities. We may transfer your Personal Information to third parties in connection with a reorganisation, restructuring, merger, acquisition or transfer of assets, provided that the receiving party agrees to treat your Personal Information in a manner consistent with this Privacy Notice.
- Data processors. As necessary for the Processing Purposes described above, personal data may be shared with one or more third parties, whether affiliated or unaffiliated, to process Personal Information under appropriate instructions ("Data Processors"). The Data Processors may carry out instructions related to administration to providing our products and services to our customers such as IT system support and maintenance, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organisational security measures to safeguard the Personal Information, and to process the Personal Information only as instructed.

Transfers of Personal Information to other countries

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using the website or our products and services, you consent to the transfer of information to countries outside of the location(s) of your business which may have different data protection rules than those of your country.

We will take all steps that are reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Notice as well as applicable data protection laws. Some countries where recipients may be located already provide an adequate level of protection for this data.

If recipients are located in other countries without adequate protections for personal data, TLP will take all necessary measures to ensure that transfers are adequately protected as required by applicable data protection law. This will include using appropriate safeguards such as the EU Standard Data Protection Clauses.

4) HOW LONG WILL TLP KEEP MY PERSONAL INFORMATION FOR?

We will only retain your Personal Information for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable law.

When we no longer need to use Personal Information, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it. Our typical retention period is five years beginning from the date on which our commercial relationship with you ends, however longer periods may be applied based on applicable law.

5) WHAT RIGHTS DO I HAVE IN RESPECT OF MY PERSONAL INFORMATION?

Depending on the jurisdiction you are in or where we operate, you may enjoy certain rights at law in relation to our collection, use or disclosure and processing of your Personal Data.

If you are a resident in the European Economic Area, you have the following rights under the GDPR:

(a) Access

You have the right to confirm with us whether your Personal Data is processed, and if it is, to request access to that personal data including the categories of Personal Data processed, the purpose of the processing and the recipients or categories of recipients. We do have to take into account the interests of others though, so this is not an absolute right, and if you want to request more than one copy we may charge a fee.

(b) Rectification

You may have the right to rectify inaccurate or incomplete personal data concerning you. We encourage you to review this information regularly to ensure that it is accurate and up to date.

(c) Erasure (right to be forgotten)

You have the right to request that we delete Personal Information that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

(d) Restriction of processing

You have the right to restrict our processing of your Personal Information where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

(e) Data portability

Where we are processing your Personal Information on the basis of your consent or to perform a contract with you, you have the right to obtain Personal Information you have provided to us and that we hold about you, in a structured, electronic format, and to transmit such data to another data controller.

(f) Right to object and rights relating to automated decision-making

Under certain circumstances you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data, including profiling, by us and we can be required to no longer process your Personal Data. This may include requesting human intervention in relation to an automated decision so that you can express your view and to contest the decision.

(g) Right to withdraw consent to processing (including consent to receiving marketing materials)

If you have consented to us processing your Personal Data for a particular purpose, you have the right to withdraw your consent at any time, free of charge, by contacting us.

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to, Singapore, the Personal Data Protection Commission can be contacted as follows:

Telephone: +65 6377 3131

Website: www.pdpc.gov.sg

Web-form: <https://eservice.pdpc.gov.sg/case/dp>

Address: 10 Pasir Panjang Road, #03-01 Mapletree Business City Singapore 117438

AMENDMENTS TO THIS PRIVACY NOTICE

We reserve the right to change our Privacy Notice from time to time. If we decide to change our Privacy Notice we will notify you of these changes via email and post an alert on the home page of our global website.

January 2019