



## PDPA NOTICE

2022-04-28

This PDPA Notice describes how FCPL manages and safeguard personal data. Personal data is information about a living person, including identification details, contact details and other information processed in relation to you.

By submitting your own or another individual's personal data, you confirm that you and such other individual agree to our collection, use and disclosure of personal data in accordance with this PDPA Notice. Please do not send us any personal data if you do not want it to be used in this way.

### THE PERSONAL DATA WE COLLECT

In the course of our services, you may provide personal data to us, as clients or other parties (in particular the fund manager and fund administrator) involved in our work by way of written or oral communication. Such communication may be saved and/or recorded to receive and check your instructions or orders, give advice, manage risk, detect fraud and/or other issues. Your personal data may also be provided by someone on your behalf, in which case, we will assume until notified otherwise, that you have authorised the disclosure of your personal data to us.

### WHAT WE USE YOUR PERSONAL DATA FOR

We only use your information in connection with the provision of services and investment into the Fund, including:

- (a) to provide you with information, materials, publications and client communications which we think you will find valuable;
- (b) to communicate with you to inform you of changes and updates to our policies, terms and conditions and other administrative information, including professional services provided to you;
- (c) to administer, maintain, manage and operate the fund, if any, on your investment, including liaising with banks, fund managers, fund administrators, corporate secretarial service providers and government authorities;
- (d) to comply with all relevant regulations, authorities and reporting obligations in relation to your fund, if any;
- (e) to verify your identity for the purposes of providing you with our services in relation to your fund, if any;
- (f) to respond to your queries and requests and handling complaints;
- (g) to keep proper records and documentation in relation to the fund, if any;
- (h) to provide and improve our services to you and our clients;
- (i) to manage our relationship with you and our other clients and counterparts;
- (j) to fulfil our legal obligations, protect our legal interests and rights; and
- (k) any other purpose directly relating to any of the above;

(the "**Purposes**").

We do not sell or otherwise make personal information commercially available to any non-related third party, except as described in this PDPA Notice or with your prior permission.

### WE MAY SHARE YOUR DATA WITH OTHER PERSONS FOR THE PURPOSES

We may share your data with third party or third-party service provider engaged by us to provide the Services (or any part thereof) to you or any government bodies, for any or all of the Purposes, unless such sharing is prohibited by law. Subject to the foregoing, we will not share your personal data with any other person, unless we have obtained your consent or where such sharing is permitted by applicable law.

## DATA RELATING TO PERSONS OTHER THAN YOURSELF

We may request or collect data relating to persons other than yourself from you, in the course of your access to and use of the Services. Where this involves the personal data of another individual, you represent and warrant that:

- (a) you have notified and obtained consent from that individual to allow you to provide his/her personal data to us, and to allow us to handle, collect, store, use, disclose or otherwise process such personal data for any or all of the Purposes, or other purposes as notified by us to you from time to time; and
- (b) such personal data is true, correct, current and complete.

## OTHER WEBSITES

Our websites may contain links to other websites which are not maintained by Finapac. This privacy policy only applies to the websites of Finapac. When visiting these third party websites, you should read their privacy policies which will apply to your use of the websites.

## RETENTION OF PERSONAL DATA

Your personal data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

## SECURITY

We will take reasonable care to implement security measures which safeguard against unauthorised or unlawful access to, or alteration, disclosure or destruction of your personal data. If our data processing is carried out by a third party, we will require that they adhere to our standards.

## YOUR RIGHTS

You can request to see the personal data we hold about you and, if the personal data is inaccurate, you can request that we update it. You may do so by sending us an email at [investor.relations@finapac.sg](mailto:investor.relations@finapac.sg). Please allow us reasonable time to respond and effect any change.

## WITHDRAWAL OF CONSENT

If you wish to withdraw your consent to use or disclose any of your personal data, you may send us an email at [investor.relations@finapac.sg](mailto:investor.relations@finapac.sg). Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our products or services to you. Such withdrawal may also result in termination of any business relationship you may have with us.

By not informing us or unsubscribing, we will assume we have your implied consent to use your personal data as described above

## REVISIONS

We reserve the right to change this PDPA Notice from time to time.

## CONTACT US

Any questions or requests concerning this PDPA Notice should be directed to [investor.relations@finapac.sg](mailto:investor.relations@finapac.sg) or by phone at +65 6509 3908.

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