

AMUNDI SINGAPORE LIMITED

PERSONAL DATA PROTECTION POLICY

This Personal Data Protection Policy (“**Policy**”) has been prepared pursuant to the Personal Data Protection Act 2012 of Singapore (the “**PDPA**”) to explain what personal data Amundi Singapore Limited (“**Amundi SG**”) may collect, use or disclose, and how Amundi SG protects such personal data.

Amundi SG’s goal is to maintain the trust and confidence of all its customers and prospective customers in its handling of personal data.

This Policy explains:

- The type of personal data we collect and how we collect it
- How we use your personal data
- The parties that we disclose the personal data to
- Where we transfer your personal data
- The choices we offer, including how to access and update your personal data

This Policy is also intended to provide corporate and institutional customers (collectively “institutional customers”) with sufficient information to allow them to provide notice to relevant individuals and obtain consent from relevant individuals in relation to Amundi SG’s collection, use and disclosure of personal data described in this Policy and/or to allow such institutional customers to determine that their disclosure of the personal data described in this Policy to Amundi SG is in accordance with PDPA. Such relevant individuals may include the institutional customer’s beneficial owners, partners, committee members, directors, officers or authorized signatories, representatives, dealers, employees and other natural persons related to the institutional customer.

Where a relevant individual fails to supply relevant information or data or withdraw consents in respect of use and/or disclosure of relevant information or data as described in this Policy, Amundi SG may be unable to open or continue accounts, or establish or continue to provide financial services to the institutional customer. Amundi SG will inform the institutional customer of likely consequences where the relevant individual withdraws consent given or deemed to have been given.

For the purposes of this Policy, please note that:

- “*Personal data*” refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an organisation has or is likely to have access. This includes unique identifiers (e.g. NRIC number, passport number); as well as any set of data (e.g. name, age, address, telephone number, occupation, etc.) which when taken together would be able to identify the individual.
- “*we*”, “*us*” and “*our*” refers to Amundi SG “*you*” and “*your*” refers to you

What Kind of Personal data We Collect And How We Collect it:

In order to enable us to deal with your inquiries, manage the accounts for you or the organisation that you represent and/or to generally provide you with our products and services (“products and services”), we may need to and/or may be required to collect, use, disclose and store (i.e. “process”) personal data about you, including but not limited to:

- a. personal data to establish your identity and background;
- b. personal data that you provide when you apply for any of our products and services.

We may obtain this information from you and/or from a variety of sources, including but not limited to:

- a. through your relationship with us, for example information provided by you in application forms, agreements you enter into with us, when using our products or services;

- b. through your verbal and written communications with us;
- c. from an analysis of the way you use and manage your investment products and/or services with us, from the transactions you make and from the payments which are made to/from your investment(s);
- d. from third parties connected with you, such as the organisations that you represent or your financial advisers, subject to your prior consent;
- e. information and data collected such as images, photographs, videos, CCTV footage, voice recordings when you participate in events organised by Amundi SG, such as functions, seminars or contests; and/or
- f. from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

How We Use Your Personal data

We may use your personal data for one or more of the following purposes:

- a. to confirm and verify your identity;
- b. to assess your application(s) /inquiry(ies) for our products and services;
- c. to process your transactions in relation to your investment(s) in any of our products and services;
- d. to manage and maintain your investment(s) portfolios/accounts with us;
- e. to better manage our business and your relationship with us;
- f. to notify you about benefits and changes to the features of our products and services;
- g. to respond to your enquiries and complaints and generally to resolve disputes;
- h. to post your photograph and other visual images of you on Amundi's intranet, websites and publications;
- i. to update, consolidate and improve the accuracy of our records;
- j. to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- k. to conduct research for analytical and/or statistical purposes;
- l. for audit, compliance and risk management purposes;
- m. to assess financial and insurance risks;
- n. to conduct anti-money laundering checks; for crime detection, prevention and prosecution; and/or
- o. for any other purpose that is required or permitted by any laws, regulations, guidelines and/or relevant regulatory authorities.

We will ask for your consent before using your personal data for a purpose other than those that are set out in this Policy, in the prospectuses and application forms of our funds, in your agreement(s) with us or in the agreement(s) that the institutional customer signed with us.

Disclosure Of Your Personal data

As a part of providing you with our products and services and the management and/or operation of the same, we may be required or need to disclose information about you and/or your investment portfolios with us to the following third parties:

- a. companies and/or organisations that act as our agents and/or professional advisers;
- b. companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions that you have requested;
- c. any other person notified by you as authorised to give instructions on your behalf;
- d. any third party as a result of any restructuring of your investments, or the acquisition or sale of any company by Amundi SG, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and/or
- e. any competent authority(ies) and/or regulator(s),

subject at all time to any laws, (including regulations, guidelines and/or obligations) applicable to Amundi SG.

We will otherwise treat your personal data as private and confidential and will not disclose your information to anyone outside Amundi SG except:

- a. where you have given permission;
- b. where we are required or permitted to do so by laws, regulations or guidelines;
- c. where required or authorised by any order of court;
- d. where we may transfer rights and obligations under this agreement;
- e. where we are required to meet our obligations to any relevant regulatory authority.

TRANSFERRING YOUR PERSONAL DATA OVERSEAS

Amundi SG may transfer your personal data to our Head Office in France to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information in accordance with Amundi Group's programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities or for any other permitted purposes as described in this Policy. Your personal data will be protected in accordance with PDPA and in accordance with the local practices and laws, rules and regulations (including any governmental acts and orders) in such countries.

Security Of Your Personal data

Amundi SG places great importance on ensuring the security of your personal data. We regularly review and implement up-to-date technical and organisational security measures when processing your personal data.

Employees of Amundi SG are trained to handle the personal data securely and with strict confidentiality, failing which they may be subject to disciplinary action.

Retention Of Your Personal data

Amundi SG will retain your personal data in compliance with this Policy, in the terms and conditions of the trust deeds of our funds, in your agreement(s) with us or in the agreement(s) that the institutional customer signed with us:

- (i) for the duration of your relationship with us;
- (ii) for such period as may be necessary to protect the interests of Amundi SG and/or its customers as may be deemed necessary; and/or (iii) where otherwise required by the law.

What If Personal data Provided By You Is Incomplete?

It may be obligatory for you in some instances to provide certain personal data to enable us to process your application or provide you with our products or services. If you are unable to or decline to provide such obligatory personal data, we may not be able to process your application or provide you with the said products or services.

Your Rights To Access And Correct Your Personal data

We can assist you to access and correct your personal data provided to us.

Where you wish to have access to your personal data in our possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us by contacting us at the address detailed at the end of this Policy and completing our Data Access Request Form or Data Correction Request Form respectively. These forms are available at our office.

We will use reasonable efforts to comply with your request to access or correct your personal data within 30 days of receiving your duly completed Data Access Request Form/Data Correction Request Form and the relevant processing fee (if any).

Please note that we may withhold access to your personal data in certain situations, for example when we are unable to confirm your identity, where the information reveals personal data about another person, where such information is subject to legal privilege or if such provision of information will be contrary to national interest or if such refusal is permitted under PDPA. Nevertheless, we will notify you of the reason(s) for not being able to accede to your request, subject to any legal or regulatory constraints.

Please also note that Amundi SG may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

You can also assist us to keep your personal data (such as your current mailing address) up to date, as it will enable us to serve you better.

Enquiries/Complaints/Communication

Should you have any queries, concerns or complaints in relation to this Policy, kindly contact us during office hours between 9.00 am to 6.00 pm - Monday to Friday at the following contact point:

Amundi Singapore Limited

Address : 80 Raffles Place #23-01, UOB Plaza 1, Singapore 048624

Attention : Data Protection Officer