



SAC Capital Private Limited – Data Privacy Notice

Introduction

SAC Capital Private Limited and its associated companies respect the privacy and confidentiality of personal data in our possession or under our control. We have implemented policies and practices to safeguard the collection, use, disclosure and storage of personal data provided to us, in compliance with the Singapore Personal Data Protection Act (PDPA) 2012.

How We Collect Your Personal Data

The PDPA defines personal data as 'data, whether true or not, about an individual who can be identified a) from that data; or b) from that data and other information to which the organisation has or is likely to have access.' We collect personal data through the following methods / channels:

External collection channels

- Corporate events
- Job Applicant
- Job Search Portals
- Marketing pitches
- Networking events
- Road shows
- Website - Corporate (via submission forms, emails)

Internal collection channels

- Administration
- Catalyst Sponsorship
- Compliance
- Corporate Finance
- Equity Capital Markets
- Equity Research
- Finance
- Human Resource
- Information Technology

Types of Personal Data We Collect About You

The types of personal data we collect about you may include:

- Communication and Correspondence
- Education Qualifications
- Ethnicity
- Family Background & Details
- Financial Information
- Medical Details / Health Information
- Personal Contact Information
- Personal Details



- Photos & Video Footage
- Professional Profile

How We Use Your Personal Data

We use the personal data we have collected about you for one or more of the following purposes:

Accounting/Finance

- Account payables/receivables

Banking & Financial services

- Conduct credit checks, screenings or due diligence checks as may be required under applicable laws/regulations

General

- Comply with legal obligations and regulatory requirements
- Fulfil contractual obligations and responsibilities
- Process and administer employment records
- Process applications and registration
- Process contract renewals and upgrades

Human Resource

- Employee communication
- Recruitment & selection
- Training & career development

Marketing

- Conduct direct marketing activities
- Notify you about enhancements to our services
- Notify you about products, services or events
- Provide newsletters and updates

Who We Disclose Your Personal Data To

Where necessary in the course of our business or where necessary to meet contractual terms and regulatory obligations, we may disclose some of the personal data we have collected about you to the following parties or organisations outside **SAC Capital Private Limited**:

Banks & Financial Institutions

- Advisory Services (Financial Investment & Insurance Products)

Data Processing and Hosting Companies

- IT/Technical support
- Webhosting companies



Education and Training Establishments, and Examining Bodies

- Commercial training providers
- Examination bodies

Government Agencies, Bodies & Departments

- Regulatory authorities or statutory boards (e.g. Singapore Exchange Limited or Monetary Authority of Singapore)

Providers of Professional Services

- Information technology service providers (e.g. infrastructure service support)

Suppliers and Providers of Goods or Services

- Conference/event organisers
- Commercial private investigators

How We Manage the Collection, Use, Disclosure and Storage of Your Personal Data

We take our responsibilities under the PDPA seriously. We are committed to implementing policies, practices and processes for data protection that comply closely with the PDPA obligations. These are elaborated in the rest of this Policy document.

Obtaining Consent

If we collect personal data directly from you, we will ordinarily first notify you of the purposes for which we are collecting it and obtain your express consent to us collecting, using and disclosing it for those purposes. We will not collect more personal data than necessary for the stated purposes. However, when you voluntarily provide personal data to us for a purpose and it is reasonable that you do so we may rely on you being deemed to have consented to us collecting, using and disclosing your personal data for that purpose. Under certain circumstances, we may collect, use and/or disclose personal data about you without your consent for example, so that we can comply with our statutory obligations or where personal data is publicly available.

Third-Party Consent

If you have a one-on-one meeting with us or do a transaction with us on behalf of another individual, you must first obtain consent from that individual in order for us to collect, use or disclose his/her personal data.

Withdrawal of Consent

If you have given us consent to collect, use and disclose personal data about you, you may withdraw that consent at any time. You should give us reasonable advance notice of your withdrawal of consent. We will notify you of the likely consequences of your withdrawal of consent, e.g. without your personal contact



information we may not be able to inform you of future updates or that the quality of our service may be impacted.

Your request for withdrawal of consent can take the form of an email or letter to us, or through the “unsubscribe” feature in an online service.

Accessing and Making Correction to Your Personal Data

You may ask us to tell you what personal data we hold about you and how we have, or may have, used or disclosed it within a year before the date of your request. We will respond to your request as soon as reasonably possible and, in any event, we will respond to you within 30 days after receiving your request. We may charge a fee for processing your request, but we will let you know the amount of the fee before you incur it.

You may also ask us to correct an error or omission in the personal data we hold about you. Unless we are satisfied on reasonable grounds that a correction should not be made, we will correct the personal data as soon as practicable.

When you make any such request, we may need to verify your identity by checking your NRIC or other legal identification document.

Accuracy of Your Personal Data

We will take reasonable precautions and verification checks to ensure that the personal data we hold is reasonably accurate, complete and up-to-date. From time to time, we may do a verification exercise for you to update us on any changes to the personal data we hold about you. If we are in an ongoing relationship with you, it is important that you update us if there are any changes in the personal data we hold about you (such as a change in your home address).

Protection of Personal Data

We have implemented an Information Security Policy that governs how we protect personal data. We make reasonable security arrangements to protect personal data about you that is in our possession or under our control to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. All our employees will take reasonable and appropriate measures to maintain the confidentiality and integrity of your personal data, and will only share your data with authorised persons on a 'need to know' basis.

External data intermediaries who process and maintain your personal data on our behalf will be bound by contractual data security arrangements we have with them.

Retention of Personal Data

We will not retain any documents containing personal data about you as soon as it is reasonable to assume that the purpose for which we collected that personal data is no longer being served by retention of it and retention is no longer necessary for legal or business purposes. We have a Document Retention Policy that spells out how long we ought to retain each type of document containing personal data and that requires such documents to be destroyed (paper documents) or deleted (electronic documents and data stored in databases) securely. Certain retention periods are based on statutory or regulatory requirements.



Transfer of Personal Data

If there is a need for us to transfer your personal data to a country or territory outside Singapore, we will ensure that the recipient organisation will be obliged to provide a standard of protection to such transferred data that is comparable to the protection it receives under Singapore law.

Compliance with Laws

Where required to do so by law, we will disclose personal data about you to the relevant authorities or to law enforcement agencies.

Links to Other Sites

Our website may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's website. It is important that you review the Privacy Policy of every site you visit. We have no control over, and are unable to assume any responsibility for, the content, privacy policies or practices of any third-party sites or services.

Changes to This Data Protection Policy

We may update our Data Protection Policy from time to time. We will notify you of any changes by posting the policy on this page. Please revisit this page periodically for any changes. Changes to this Policy are effective when they are posted on this page.

Contacting Us

If you have any questions about our collection, use, and/or disclosure of personal data about you; feedback regarding this Policy, or any complaint you have relating to how we collect, use, disclose and store personal data about you, you may contact our Data Protection Officer at dpo@saccapital.com.sg.

Any query or complaint should include, at least, the following details:

- Your full name and contact information;
- Nature of the query or complaint; and
- A brief description of your query or complaint.