



PRIVACY POLICY

I. GENERAL PROVISIONS

This policy (the “**Privacy Policy**”) describes how Tembusu Partners Pte. Ltd. (“**Tembusu**” “**we**”, “**our**” or “**us**”) collects, uses, shares, and otherwise processes Personal Data (defined below) about individual natural persons in connection with a business relationship with us, and in accordance with applicable data protection legislation. This policy applies to:

- (a) Individuals who visit and access our website (<https://tembusupartners.com>) (the “**Website**”);
- (b) Attendees at events organised by Tembusu;
- (c) Visitors at Tembusu’s office premises;
- (d) Current and prospective clients who are individual natural persons;
- (e) Individual natural persons who are representatives for all current and prospective clients;
- (f) Individual natural persons who are representatives for all current and prospective vendors, suppliers, and service providers;
- (g) Current and prospective employees; and
- (h) Any other individual natural persons about whom Tembusu collects, uses, shares, and otherwise processes Personal Data.

Please review this Privacy Policy carefully, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, prior to providing any Personal Data.

This Privacy Policy does not form part of any contract to provide services. We reserve the right to amend this Privacy Policy at any time. If material changes are made to this Privacy Policy, they will be posted on the Website and be date stamped. We encourage you to review the Privacy Policy on the Website periodically in order for you to stay notified of any changes. Your continued access and use of the Website and subscription for interests in our products and services after any changes to this Privacy Policy constitutes your consent to any such changes, to the extent such consent is not otherwise provided.

II. COLLECTION OF PERSONAL DATA

“**Personal Data**” refers to data about an individual natural person from which that individual can be identified either (a) from that data or (b) from that data and other information to which we have or are likely to have access. Depending on the nature of your relationship with us (e.g. prospective or current client, employee or vendor), Personal Data typically collected include, and are not limited to:

- (a) **Basic data:** Name, date of birth, residential address, personal email address, personal contact numbers, gender, hobbies and interests, racial or ethnic origin, bank account information;
- (b) **Due diligence data:** Government identifiers, passports or other identification documents, beneficial ownership of assets, information on source of wealth or source of funds, credentials, background check information, memberships, information about family members and associations, information about prior employment, health and medical conditions;
- (c) **Event data:** data provided at registration, dietary preferences, subscriptions, images on photographs and videos taken during our events or office surveillance;
- (d) **Investor relations data:** invoicing details, remittance details (such as bank account numbers), payment history, feedback, product interests, preferences;
- (e) **Device data:** Internet Protocol (IP) addresses, unique device identifiers, cookies, visits to and usage of our Website.

PRIVACY POLICY

“**Personal Data**” does not include:

- (a) **Anonymised information:** identifying information removed such that the remaining data, on its own or combined with other information, cannot be used to identify any particular individual;
- (b) **Business information:** data that was not provided solely for personal purposes – name, job title, organisation name, business contact information;

We collect Personal Data from a number of sources, which may include direct collection from you, or from an agent, attorney, or institution acting on your behalf, or from publically available sources. Without limitation, this can be expected to occur:

- (a) In the case of clients, before you commence business relationship with Tembusu and throughout the duration of the business relationship;
- (b) In the case of employees, when you apply for employment at Tembusu and throughout the duration of your employment;
- (c) In the case of event attendees, when you register to attend our events, and are present at the events; and
- (d) As and when required in accordance with the requirements of any relevant law, statute, court order, or legislation.

We may be legally obligated in some circumstances to collect Personal Data, such as for the purpose of conducting customer due diligence. If you fail to or are unwilling to provide certain information when requested, we will not be able to provide our services to you, perform any contract we have entered into with you, or offer to you employment or engagement arrangements.

In situations where Tembusu engages a third party under contract to collect Personal Data about you, Tembusu shall use commercially reasonable efforts to require the third party to exercise reasonable care in protecting your information.

III. USE OF COOKIES

The Website may use data collection devices such as “cookies” and other technologies to personalise your online experience, help analyse the Website flow and measure promotional effectiveness. Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. We may offer features that are only available through the use of a “cookie”.

The Website may allow third parties (for example, analytics firms and business partners) to download cookies to your device. These third parties may use cookies and other technologies to collect non-Personal Data about your online activities while you are using the Website. We have no access to, or control over these cookies, or other features these third parties use, and this Privacy Policy does not cover the information practices of such third parties.

Most browsers automatically accept cookies but you can modify your browser to decline cookies (if your browser permits you to do so). Cookies can also be deleted using your browser’s settings. However, if you disable or delete certain Cookies, you may not be able to access certain features and functions on the Website.

IV. USE OF PERSONAL DATA

We may collect Personal Data for various reasons, including the following:

- (a) To conduct customer due diligence in conformance with laws, regulations, and directives to prevent money laundering, fraud, the financing of terrorism and the proliferation of weapons of mass destruction;

PRIVACY POLICY

- (b) To determine and confirm your eligibility to subscribe for our products and services, and the suitability of our products and services for your investment objectives and risk appetite;
- (c) To fulfill our contractual obligations or exercise our rights under the relevant agreements that govern our business relationships;
- (d) To manage our business operations and administer client relationships;
- (e) To evaluate the performance of our professional service offerings, and to make adjustments and improvements where necessary;
- (f) To consider individuals for employment, and service providers for engagement;
- (g) To improve our Website; and
- (h) To review, process, and confirm any request or application submitted by you in connection with the business relationship and with this policy.

Personal Data will be held for as long as it is necessary to fulfill the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain Personal Data, or remove the means by which the Personal Data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that Personal Data was collected is no longer being served by retention of the Personal Data and retention is no longer necessary for legal or business purposes.

V. SHARING YOUR PERSONAL DATA

We may share your personal information with trusted third parties, which may either be in Singapore or abroad, and may include:

- (a) Law enforcement or government authorities where they have followed due judicial process to request for disclosure of the information;
- (b) Tax authorities in accordance with the relevant legislation that mandate the sharing of information, such as the Foreign Account Tax Compliance Act ("FATCA"), the Common Reporting Standard ("CRS"), and the Mandatory Disclosure Regime ("MDR");
- (c) Third party service providers, such as auditors, corporate secretarial agents, fund administrators, tax filing agents, legal counsel, and other professional service providers who would be bound to confidentiality by privilege and non-disclosure agreements; and
- (d) Web analytics tool providers, such as Google.

We may share your Personal Data for reasons including:

- (a) The verification of your information, such as identity, asset beneficial ownership, prior employment history;
- (b) To conduct investigations into possible breaches of applicable laws, regulations, and agreements;
- (c) To comply with any subpoena, court order, or other legal or regulatory requirements, requests from regulators, governmental agencies, or any other legally enforceable demand; and
- (d) To establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.



PRIVACY POLICY

VI. TRANSFER OF PERSONAL DATA

If necessary, we may transfer, store, process and/or deal with your Personal Data outside Singapore. In these cases, we will comply with the Singapore Personal Data Protection Act 2012 (“PDPA”) and other applicable data protection and privacy laws.

In the event that ownership of Tembusu, or substantially all of its assets, is transferred to one or more third parties as a result of an acquisition, merger, sale, reorganization, consolidation, or liquidation, databases containing Personal Data may be among the transferred assets. By your subscription for our products and services, you consent to such transfer of your Personal Data.

VII. YOUR RIGHTS

You have a right to request to access, amend, transfer, and delete your Personal Data held by Tembusu. To make such requests, please contact our Data Protection Officer at dpo@tembusupartners.com.

- (a) **Request access:** Subject to certain exceptions, you have the right to request a copy of your Personal Data in our possession, which we will provide to you in electronic form. At our discretion we may require you to prove your identity before providing the requested information and we may charge a reasonable administration fee to fulfill your request.
- (b) **Request amendment:** You have the right to require that we amend any incomplete or inaccurate Personal Data that we process about you. You also have the right to request that we restrict our processing of your Personal Data where (i) you believe such data to be inaccurate, (ii) our processing is unlawful, or (iii) we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation or because you do not want us to delete it.
- (c) **Request transfer:** You have the right to request that we transmit to another data controller the Personal Data we hold in respect of you, (i) which you have provided to us, and (ii) which we are processing on the basis of your consent or in order to perform our contractual obligations to you.
- (d) **Request for deletion:** You have the right to request that we delete Personal Data that we process about you, unless we are required to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

If you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time. However, if the nature of your withdrawal requests prevents us from providing services to you, or from fulfilling our contractual and legal obligations, we will be required to terminate our business relationship or employment arrangements with you.

VIII. SECURITY

Tembusu uses reasonable measures to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure. We are constantly reviewing and enhancing our security protocols to ensure that your Personal Data is not subject to unnecessary risks. However, due to the inherent nature of the Internet as an open global communications vehicle, no method of transmission over the Internet or method of electronic storage is 100% secure and we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others.

IX. GOVERNING LAW

This Privacy Policy has been drafted solely in accordance with the laws of Singapore. We do not represent or warrant that this Privacy Policy complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Policy as such.