

BMT Personal Data Policy

Updated as of: **August 2018**

This BMT Personal Data Policy ("PD Policy") sets out how British and Malayan Trustees Limited (Co. Reg. No. 1924000010M) ("BMT") and its associated individuals/organizations (collectively, "BMT", "us", "our") collect, use, disclose and retain your personal data.

This DPP is issued subject to and pursuant to the Singapore Personal Data Protection Act (No. 26 of 2012) ("the Act") and explains how BMT collects, uses, discloses, and protects information (which includes "Personal Data", i.e. Data whether true or not, about any individual who can be identified from that data or from that data and other information to which we would have or are likely to have access to) that we learn about you as a result of your interaction with us whether through the website (on which this DPP is posted) or in conjunction with any other transaction offline or otherwise. Please take a moment to read this DPP so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

This DPP supplements but does not supersede nor replace any other consents you may have previously provided to BMT in respect of your Personal Data, and your consents herein are additional to any rights which to any of the Companies (as defined below) may have at law to collect, use or disclose your personal data.

Among the most important assets of BMT is the trust and confidence placed in us to properly handle personal data. You can expect us to maintain your personal data accurately, protect your personal data against manipulation and errors and keep your personal data secure from theft and free from unwarranted disclosure.

This PD Policy provides you with notice as to what and how personal data is collected, how it is intended to be used, to whom your personal data may be transferred to, how to access, review and amend your personal data and our policy on the use of cookies.

BMT recognises its responsibilities in relation to the collection, holding, processing or use of personal data. The provision of your personal data is voluntary. You may choose not to provide us with the requested data, but failure to do so may inhibit our ability to do business with or provide services to you.

How we collect personal data

BMT collects personal data in the following ways:

- when you use our or services, access our website;
- when you submit documents and application forms to us during the application process for the engagement of BMT, or in consideration of the engagement of BMT for our services;
- when you submit requests for changes or updates to your trust or terms of service, or any other requests in connection with our services;
- when you respond to our queries or request for us to contact you;
- when you interact with our personnel, or related service providers via phone, email, face to face meetings, interviews, SMS, fax, mail or electronic mail;
- when we receive referrals and collect personal data from within BMT, its associated persons/organisations, agents, business partners and service providers (collectively "BMT Persons"), and third party service providers and representatives of BMT Persons;
- When we seek and identify beneficiaries or potential beneficiaries to trusts, estates, endowments and similar entities; and,
- when we seek information from third parties about you including but not limited to sources utilised by BMT to comply with its legal obligations related to know your customer and anti-money laundering requirements. By providing us with any personal data relating to a third party (e.g. related entities, family members, and beneficiaries), you represent and warrant that you shall ensure accuracy of such personal data provided and have obtained such third party's prior consent for our collection, use and disclosure of such third party's personal data for the relevant purposes, except to the extent that such consent is not required under relevant law. You further agree to keep us fully indemnified from and against any and all damages, losses, costs, legal fees (solicitor- client basis), penalties and proceedings, including any penalties or other amounts levied, imposed or charges by any regulator or regulatory authority, arising out of or in connection with your (or those of your officers, employees, advisors, agents and representatives) acts or omission, fault or negligence in performing these obligations or which results in us breaching relevant laws.

Type of personal data collected, used or disclosed

BMT may collect, use and disclose personal data including but not limited to the following:

- your personal particulars such as NRIC numbers, passport numbers, contact details, addresses, date of birth, occupation, photographs and marital status;
- your assets, including all details and related information concerning assets to be settled into a trust or otherwise related to BMT services;
- your financial information such as income, bank account numbers, CPF statements, bank statements, credit card, GIRO and other payment details;
- your employment information and employment history;
- details of your service engagements with BMT such as Trust information and related account information with other financial institutions; and
- personal data of a third party that you provide to us in connection with the purchase of our services or for referral purpose.

Purposes for which personal data is collected, used or disclosed

BMT collects, uses and discloses personal data for the following purposes:

- evaluating your needs and providing recommendations of suitable services to you;
- to assess, process, administer, implement and effect the services, requests or transactions;
- servicing your transaction, account and/or relationship with us;
- responding to your requests and queries including requests and queries from your authorised representatives and individuals purporting to be you;
- making changes or updates to your trust or other service engagements;
- reviewing your trust or other service engagements;
- providing ad-hoc or regular information about your trust or other service engagements;
- assessing, processing, settling, authenticating and investigating beneficiary claims;
- verifying your identity and any information you provide to us;
- collecting fees and making any payments to you or on your behalf in connection with our services;
- providing, managing, operating, processing and administering our and services to you;
- archiving, backing-up or destroying personal data;
- compliance, monitoring and audit reviews;
- meeting requirements of prevailing internal policies of BMT;
- to design new or enhance existing and services provided by us;
- to communicate with you including to send you administrative communications about any account you may have with us or about future changes to this PD Policy;
- for market, statistical or actuarial research and trend analysis of our services for company, regulatory or industry exercises and studies and reviewing the standard of our services;
- for data matching, internal business and administrative purposes;
- meeting requirements imposed by any law, rules, regulations, agreements or schemes imposed by any government regulators, law enforcement agencies, government authorities, dispute resolution or industry bodies or in connection with any investigations;
- conducting general administration in connection with the foregoing;
- other purposes as notified at the time of collection; and
- other purposes directly relating to any of the above.
- By providing your personal data to us, you accept that BMT may retain your information for as long as necessary, to fulfil the purpose(s) for which it is collected in compliance with applicable laws and regulations and BMT's prevailing internal policies. BMT applies reasonable security measures to prevent unauthorised or accidental access, processing, erasure, loss or use including limiting physical access to data within BMT's systems and encryption of sensitive data when transferring such data. Reasonable steps will be taken to delete, destroy or anonymise your personal data when it is no longer necessary for any of the purposes above.

We don't use personal information to make automated decisions.

Who may be provided with your personal data?

Personal data will be kept confidential but may, where permitted by law and where such disclosure is necessary to satisfy the purpose or a directly related purpose for which the personal data was collected, provide such personal data to the following parties:

- your designated advisers and other service providers (including our financial services consultants);
- any BMT Persons, third party service providers and representatives of BMT Persons who provide administrative services, business process services, storage services, scanning of documents services, printing and despatch of documents, document processing and archiving services, information technology services, data centre services, payment services, data analytics services, marketing services and other services to BMT in connection with the business of BMT;
- any affiliate company of BMT where necessary;
- other companies that help gather your information or communicate with you, such as research companies and ratings agencies, in order to enhance the services we provide to you;

- our professional advisers such as our lawyers and auditors;
- any law enforcement agency, statutory board, government regulator, government authority, dispute resolution or industry bodies as necessary to comply with any laws, rules, regulations, agreements or schemes;
- any party to whom you have consented the disclosure of your personal data; and
- any other party as permitted under applicable law.

From time to time, we may purchase a business or sell one or more of our businesses (or portions thereof) and where permitted by law your personal data may be transferred or disclosed as a part of the purchase or sale or a proposed purchase or sale. In the event that we purchase a business, the personal data received with that business would be treated in accordance with this PD Policy, if it is practicable and permissible to do so.

Where permitted by law, your personal data may be provided to any of the above parties who may be located in Singapore or outside of Singapore. Your information may be transferred to, stored, and processed in Singapore or any other jurisdictions where any BMT company is located, or jurisdictions where a third party contractor is located or from which the third party contractor provides us services. By providing us with your personal information or using our services or our website or applications, you consent to the transfer of such information outside your jurisdiction to our facilities or to those third parties with whom we share it as described above.

Consent for marketing purposes

BMT does not disclose or share your personal data to third parties for marketing purposes.

If you have given us consent to receive marketing and promotional information from BMT through electronic mail or postal mail or on your Singapore telephone number (s) via phone calls, text or fax, we may from time to time contact you on such Singapore telephone numbers (s) via your designated mode of communication or through electronic mail or postal mail (as the case may be) to provide you with marketing, promotional information and updates about our services.

We may also seek your consent and notify you separately of the purposes of the collection, use and disclosure of your personal data from time to time with respect to particular services.

Any consent that you have given for marketing purposes is not affected by termination of your engagement of BMT.

Consequences of consent withdrawal

You may withdraw your consent for us to collect, use or disclose your personal data by giving us reasonable notice.

If you withdraw your consent for us to collect, use or disclose your personal data for non-marketing reasons, we will be unable to process, administer and/or manage your trust or other engagements, relationship and/or account with us. In such event, you may be required to terminate all your engagements, relationships or accounts or withdraw from any programs in which you are participating. This may be to your disadvantage, as you may be losing valuable benefits from your service engagements or programmes, incur costs and charges or it may not be possible for you to obtain a similar level of protection on the same terms in the future.

You may withdraw your consent for your personal data to be used for marketing purposes and you will stop receiving marketing information from us via the mode(s) of communication for which you have withdrawn such consent after a period permitted under law or in accordance with our internal policies. Please note that such withdrawal of your consent will not affect our ability to provide you with the services for which you have requested or to which you have applied, subscribed or are participating with us.

Data accuracy

As BMT relies on your personal data to provide services to you, you shall ensure that the information provided by you to us is at all times correct, accurate and complete. You shall update us in a timely manner of all changes to the information provided to us.

Access And Correction

You may request access or make corrections to your personal data held by BMT. BMT may charge a fee for processing your request for access. Such a fee depends on the nature and complexity of your access request. Information on the processing fee will be made available to you.

The GDPR also provides relevant individuals with additional rights including the right to obtain information on how BMT process your personal data, receive certain information provided in an electronic format and/or request that these be transmitted to a third party, request for your information to be erased, object or restrict the use or processing of your

information in some circumstances. These will be subject to ongoing obligations imposed on BMT pursuant to any applicable law or regulation, and/or BMT's legitimate reason or entitlement to continue processing your information, and/or to refuse that request.

Please contact us for details on how you may request access or correction to, or exercise your rights with respect to the processing of your personal data.

Use of cookies

Cookies are unique identifiers placed on your computer or other device by a web server, which contains information that can later be read by the server that issued the cookie to you. BMT may use cookies on various websites we maintain. The information collected (including but not limited to: your IP addresses (and domain names), browser software, types and configurations of your browser, language settings, geo-locations, operating systems, referring website, pages and content viewed, and durations of visit) will be used for compiling aggregate statistics on how our visitors reach and browse our websites to help us understand how we can improve your experience on it. Such information is collected anonymously and you cannot be identified. We use such data only for website enhancement and optimisation purposes. The cookies also enable our website to remember you and your preferences, and tailor the website for your needs. Advertising cookies will allow us to provide advertisements on our websites that are as relevant to you as possible, e.g. by selecting interest-based advertisements for you, or preventing the same advertisement from constantly reappearing to you.

Most web browsers are initially set up to accept cookies. If you do not want to receive cookies, you can disable this function in your browser settings. However, by doing so you may not be able to fully enjoy the benefits of our websites and certain features may not work properly.

Amendments to this PD Policy

BMT reserves the right, at any time and without notice, to add to, change, update or modify this PD Policy, simply by notifying you of such change, update or modification. If we decide to change our personal data policy, those changes will be notified on our website so that you are always aware of how and what information we collect, how we use the information and under what circumstances the information is disclosed. Any such change, update or modification will be effective as stated in the PD Policy.

Contact us

You have the right to access and request for the correction of your personal data and withdraw your consent given to us to collect, use or disclose your personal data. We may charge a fee for data access requests. In all cases, requests for withdrawal of consent, access and correction should be addressed in writing to:

British and Malayan Trustees Limited
Customer Inquiries
1 Coleman Street
#08-01 The Adelphi
Singapore 179803

For enquiries on personal data related matters, you may write to:
The Data Protection Officer
British and Malayan Trustees Limited
1 Coleman Street
#08-01 The Adelphi
Singapore 179803

Email: DPO@BMTrust.com

Additional information

Should you have any questions on any part of this PD Policy or would like additional information regarding BMT's personal data practices, please do not hesitate to contact us via the contact channels set out above.

