



BRITISH AND MALAYAN TRUSTEES LIMITED (“BMT”) PERSONAL DATA PROTECTION POLICY

Updated as of March 2022

This BMT Personal Data Protection Policy (“PDPP”) sets out how BMT and its associated individuals / organisations / staff members of the company (collectively known as “BMT”, “we”, “us”, “ours”) collect, use, retain your personal data.

In this PDPP, personal data will be referred to as Persona Data / Information or vice-versa and shall be used interchangeably within this document.

Personal data is information about an individual, including identification / contact and other personal information being provided to BMT and/or our associated company(s).

The PDPP is issued as part of the requirements and pursuant to the Singapore Personal Data Protection Act 2012 (as revised in 2020) (the “Act”), and explain how BMT collects, uses, and protects information (which includes “Personal Data”), as gathered on individual(s) and/or other related individuals, corporate information and other related information, through business contacts / interactions with BMT.

Among the most important assets of BMT is your trust and confidence placed in us to properly handle the personal data which you will expect us to maintain your personal data as accurately as possible, and to protect your personal data against manipulation and errors, also keeping the personal data secure from theft and free from unwarranted disclosures.

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

This PDPP provides the details as to what and how personal data is collected, how it is intended to be used, to whom the personal data may be shared / transferred to, how to access, review and amend the personal data and our policy on the use of cookies.

This PDPP supplements but does not supersede nor replace any other consents which may have been previously provided to BMT in respect of your personal data, and your consents herein are additional to any rights which may have at law, to collect, use and/or share the personal data.

Section 1 – BMT Data Privacy Principles

a.	Transparency	We will be clear and transparent as to how we collect / use / share the data, including providing data subjects with a statement of how we may use their data where required.
b.	Fair and Lawful Usage	We will only collect, process and store data lawfully and where we have a legitimate reason to do so.
c.	Limited purposes	We will collect and process data for specific and lawful purposes and will not use it for further, incompatible purposes without first taking all steps necessary under applicable data privacy laws and regulations.



d.	Data minimisation and adequacy	<p>We will ensure our collection, retention and processing of data is proportionate.</p> <p>We will strike an appropriate balance to ensure that we process sufficient data to carry on our business and achieve any specified lawful purpose, while making sure that we do not collect, retain and process excessive amounts of data.</p>
e.	Data quality and accuracy	<p>We will maintain the appropriate standard of data quality and integrity, as well as data accuracy, taking steps to avoid becoming out of date where appropriate.</p>
f.	Data security and retention	<p>We will retain data securely, in physical or electronic form, through our secured data retention platform, for the duration of time necessary to carry out the purpose for which your personal data was collected.</p> <p>We will also abide by legal, tax and other regulatory and industry requirement / guidelines for keeping such personal data, including our retention of record policy.</p> <p>We will also dispose data securely once it is no longer required and subject to BMT's retention of record policy.</p> <p>Our 3rd party service providers are required to comply with strict measures (or equivalent to the standards of BMT's data privacy principles) to protect your personal data.</p>
g.	Training and awareness	<p>We ensure all our BMT staff members, with access to the data, are fit and proper and are trained to safeguard such data as part of their professionalism.</p> <p>All staff members processing personal data of customers are subjected to a duty of confidentiality.</p>
h.	Data subject rights	<p>We ensure that data subjects' rights are observed in accordance with the applicable data privacy laws and regulations in the Republic of Singapore.</p>
i.	Third Parties	<p>Where we appoint a vendor or agent, we will require them to apply standards equivalent to our data privacy principles.</p> <p>We will only disclose data under our legal obligation and accordingly to the requirements of the regulators, governmental or judicial bodies or law enforcement or agencies where this is allowed by the applicable data privacy laws and regulations, or</p>



		otherwise required by applicable laws and regulations in respect to Republic of Singapore.
j.	Data transfers	We will only transfer / share the data when this is necessary and with consent by the individuals whereby the data relates. We will ensure that the data transferred / shared is lawful and the recipient is required to apply the same (or equivalent) standards as our BMT Data Privacy Principles.

SECTION 2 – DATA PRIVACY NOTICE

Your personal data / information is important to us. It is also important that you read this notice so that you are fully aware of how and why we are collecting and using your data.

1. How we collect your data:

- when you interact with us (via phone, email, face to face meetings, interviews, through mobile apps and communication, postal mails or e-mails, fax etc), use of our products and services, access to our website;
- when we receive referrals and collect personal data from within BMT, its associated persons / organisations, agents, business partners and service providers (collectively “BMT and related persons”), and 3rd party service providers and representatives of BMT and related persons.
- when you submit documents / application forms to us, during the setting up process for the engagement of BMT’s product and services, or in consideration of an engagement of BMT for our product and services;
- when you submit request(s) for changes or updates to the trust terms or terms of services, or any other related requests in connection with our services;
- when you respond to our queries or request for us to contact you;
- when seeking information from 3rd 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 3rd party (related entities, family members, beneficiaries), you represent and warrant that you shall ensure accuracy of such personal data provided and have obtained such 3rd party’s prior consent for our collection, use and disclosure of such 3rd party’s personal data for respective purpose, except to the extent that such consent is not require under relevant law.

You further agree to keep us fully indemnified from and against any and all damages, losses, costs, legal fees, penalties and proceedings, including any other penalties and 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.



2. Types of Personal Data collected, used or shared (disclosed)

BMT may collect, use, share (disclose) personal data / information including but not limited to the following:

- a. data / information that you give to us such as your contact details and your identification and other related documents, for example – identification numbers (Singapore NRIC / foreign passport / identification card numbers), residential / registered business addresses, date of birth, employment status / business ownerships, marital status / family background, etc.
- b. assets holding details (source of wealth) – for example, if you declare a residential property as owned, to provide the details such as title deed and other related documents, including credit information if the property is bought using housing loan. This is to facilitate the establishment of a private trust or other related BMT services.
- c. Financial information such as business / employment income, bank account(s), CPF contributions, tax filings and other related information similar to such.
- d. In addition to point (a), employment history (example, a detailed write-out on past employments, including designations, appointments and job roles).
- e. Details of other private trust established with other local / foreign financial institutions and other private investment holding(s), locally held or offshore. Please also refer to point © – for bank account(s), with local or offshore financial institutions.
- f. Personal data / information of trust related parties and/or 3rd parties that you have appointed to act on behalf or who you give consent to transfer data to / from us, that you provide to us in connection of your engagement of BMT services or for referral purposes.

With regards to point (f), you must make sure that you have obtained written consent from the persons and that you have retained proof of these consents which you may need to provide us with such proof if we request for it.

When sharing / disclosing your data / personal information as listed above, to any other 3 parties (for example, within our net-work, 3rd party service providers, agents appointed by us to act on our behalf, banks or financial institutions), we will ensure that your consent is sought before any sharing / disclosing will be made.

We may also in limited circumstances disclose your data / personal information to regulatory bodies, government agencies, law enforcement bodies, courts and such persons or bodies to whom we are legally required to disclose to or in relation to any order or judgment of a court, whether locally or offshore.

We may share / disclose, your personal data / information to our professional advisers and consultants including but not limited to lawyers, accountant, auditors and insurers on a need-to-know basis for the purpose of providing their services and/or advice to us.

3. Data / Information Use and Purpose

BMT collects, processes and retains your personal data that is necessary to perform its functions and activities which may include but not limited to the followings:

- Provide information about our services and solutions as requested by you (or the organisation you represent).
- Assess you (or the organisation you represent) for products and services to enable us to provide and operate them.
- Process any applications that you (or your organisation) have submitted to us.



- Conduct regulatory checks necessary and under our legal obligations with regards our know-your-customers procedures and anti-money laundering regulations and verification of identities and/or information / data as provided to us.
- Provide our services and/or solutions as requested and to notify you (or the organisation you represent) about any important changes or developments.
- Responding to your request(s) and query(s), including request(s) and query(s) from your appointed and authorised representatives.
- To assess, process, administer, implement and effect the services, requests or transactions.
- To review, make changes or updates to your trust(s) services and other service engagements.
- For checks and verifications of claims from beneficiaries of private trusts and also general administration in connection with the foregoing.
- Collection of fees and/or making payments to you or on your behalf in connection with our services and other related services.
- Compliance, on-going monitoring and internal and external audit reviews.
- For designing new service(s) and improving our existing services to you.
- For communication with you, including any administrative communications about your account(s) or changes to this PDP.
- For market, statistical or actuarial research and trend analysis of our services with regards to regulatory and/or industry reporting / surveys and reviewing our standards of services to you.
- For prevention, detention or prosecution of crime purpose and to comply with the legal and regulatory obligations, including dispute resolution or any other investigations.
- Other purposes as notified at the time of collection.

4. Consent for Marketing Purposes

BMT does not disclose or share your personal data / information to 3rd parties for marketing purposes.

If you have given us consent to receive marketing and promotional information from BMT through postal or e-mails or on your mobile telephone number(s) via phone calls, SMS, WhatsApp messages, or by fax, we may, from time to time, contact you via your chosen / designated mode of communication(s), to provide you with any marketing and/or promotional information or any updates to our services and products.

We may also seek your consent first and notify you separately on the purposes of the collection, use and sharing / disclosing of your personal data / information from time to time with respect to particular services.

Any consent(s) that you have / had given for marketing purposes is not affected by termination of your engagement with BMT.

5. Consequences of Consent Withdrawal

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

If you withdraw your consent to us to collect, use, share and/or disclose of your personal data for non-marketing reasons, we are unable to process, administer and/or manage your private trust(s) or other engagements, relationship and/or account(s) with us.

In such event, you may be required to terminate all your engagements, relationships, account(s) 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 engagement(s), 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 / information 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 the law, or in accordance to our internal policy(s).

Please note that such withdrawals 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, engaged us for, or participating with us.

6. Data Accuracy

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

a. Access and Correction

You may request for access or make corrections to your personal data / information held by BMT. BMT may charge a fee for processing the request to access, depending on the nature and complexity of your request to access. Details of the fee(s) / charge(s) will be made available to you.

The General Data Protection Regulation (“GDPR”) also provides for related / respective individual(s) with additional rights, including the right to obtain information on how BMT processes your personal data / information, receive certain information provided in an electronic format and/or request that these be transmitted to a 3rd party, request for your personal data / information to be erased, to object or to restrict the use or processing of your information in some circumstances.

These will be subject to on-going obligations imposed on BMT pursuant to any applicable law(s) and/or regulation(s), and/or BMT’s legitimate reason(s) or entitlement(s) to continue processing your personal data / information and /or to refuse that request.

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

SECTION 3 – WEBSITE POLICY

Cookies are text files with small pieces of data – like username and password – that are used to identify your computer as you use a computer network. Specific cookies known as HTTP cookies are used to identify specific users and improve your web browsing experience.

Data stored in a cookie is created by the server upon your connection. This data is labelled with an ID unique to you and your computer. The cookies also enable our website to remember you and your preferences, and to tailor the website for your needs.

Advertising cookies will allow us to provide advertisements on our website that are relevant to you as possible – for example, by advertisements that are of your interest and/or preventing the same advertisement from constantly appearing.

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(s), types and configurations of your browser, language setting, geo-locations, operating systems, referring websites, pages and contents viewed and durations of visit(s), 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 visitors to our website cannot be identified, including yourself. We use such data only for website enhancement and optimisation purposes.



Most web browsers are initially set up to accept the cookies. If one does not wish to receive the cookies, it can be disabled by the function in your browser settings. By doing this, you may not be able to fully enjoy the benefits of our website and certain features may not work properly.

Amendments to the PDPP

BMT reserves the rights, at any time and without any notice, add, change, update or modify this PDPP.

If BMT decides to change our PDPP, such 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.

Contact BMT

You have the right to request for the correction of your personal data / information and withdraw your consent given to us to collect, use, share or disclose your personal data. For such request, we may impose a fee as a service charge.

Any request to withdrawal of consent, and to correct your personal data / information should be address in writing to:

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

Attention: The Data Protection Officer
Ms Mabel Wee

For enquiries on personal data related matters, you may also write to the above-mentioned address and to attention to the Data Protection Officer as well.

Should you have any questions on any part of this PDP and will like addition information regarding BMT's personal data practice, please do not hesitate to contact us via our office telephone number at +65 6535-4922 or via our email contact at enquiry@bmtrust.com

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