

STRAITS FINANCIAL GROUP DATA PROTECTION POLICY

We, **Straits Millennium Pte Ltd** (“**SMPL**”) and our affiliates (collectively, the “**SF Group**”, and each an “**SF Group Entity**”), take our responsibilities under the Data Protection Law seriously. We also recognize the importance of the Personal Data you have entrusted to us and believe that it is our responsibility to properly manage, protect and process your Personal Data.

This Data Protection Policy is designed to assist you in understanding how we collect, use, disclose and/or process the Personal Data you have provided to us, as well as to assist you in making an informed decision before providing us with any of your Personal Data.

If you, at any time, have any queries on this policy or any other queries in relation to how we may manage, protect and/or process your Personal Data, please do not hesitate to contact our Data Protection Officer (the “**DPO**”) at the contact information below.

1. INTRODUCTION AND DEFINITIONS

- 1.1. “**Personal Data**” means 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, or such other meaning as set out in the Data Protection Law.
- 1.2. We will collect, use, disclose or otherwise process your Personal Data in accordance with the Data Protection Law. We will notify you of the purposes for which your Personal Data may be collected, used, disclosed and/or processed, as well as obtain your consent for such collection, use, disclosure and/or processing of your Personal Data, unless an exception under any law permits us to do so without your consent.
- 1.3. In this Data Protection Policy, the following terms are defined as follows:

“**Account**” means an account opened by you and maintained with an SF Group Entity, whether for the purpose of effecting Transactions on the Platform or otherwise;

“**Data Protection Law**” means the applicable data protection and privacy laws and regulations applicable to the relevant SF Group Entity, which relate to the collection, disclosure, use, and/or processing of Personal Data, privacy, data security, or other forms of personal information. In relation to SMPL and/or any SF Group Entity (if any) formed or recognised under the law of Singapore, Data Protection Law shall refer to Singapore’s Personal Data Protection Act 2012 (“**PDPA**”) including all amendments thereto and subsidiary legislation enacted thereunder, whether now or in the future;

“**Order**” shall have the meaning as set out in the applicable Master Trading Agreement entered into between an SF Group Entity and you (where applicable). Without limiting the generality of the foregoing, “**Order**” shall include any authorisation, request, instruction or order (in whatever form and howsoever sent) given or transmitted to an SF Group Entity by you or which an SF Group Entity reasonably believes to be the authorisation, request, instruction or order by you in relation to an Account or in respect of a Transaction, and includes any authorisation, request, instruction or order to revoke, ignore or vary any previous authorisation, request, instruction or order;

“**Platform**” means the trading platform owned or operated by an SF Group Entity; and

“**Transaction**” shall (a) have the meaning as set out in the applicable Master Trading Agreement entered into between an SF Group Entity and you (where applicable); or (b) refer to such other transactions or services as an SF Group Entity may from time to time permit to be carried out with, to or for you, whether under any Account or otherwise.

2. PERSONAL DATA COLLECTED

- 2.1. Depending on the circumstances or the nature of the transaction with you, the Personal Data we may collect from you includes (but not limited to):

- (a) personal information (i.e. name, including any aliases, residential address, age, gender, birth of date, nationality, ethnicity, government issued identification number or passport details);
- (b) Photos and/or video footage records of you in our offices or premises, where we may have CCTV or recording media holding such records;
- (c) specimen signature(s);
- (d) family background and details;
- (e) educational information;
- (f) financial information (i.e. credit/debit card details, bank account number, banking transaction or statements, tax, and insurance details etc);
- (g) employment information (e.g. occupation, directorships and other positions held, employment history, salary, criminal background/past offences etc);
- (h) location information of yourself and/or your computer or device ID;
- (i) contact information (i.e. personal mobile number, personal electronic mail address);
- (j) transactional information (i.e. your purchase and/or transactions with us, historical trade data you have made including the trading statements, confirmations notices, summary files etc);
- (k) usage and preferences;
- (l) Information about your risk profile, investment objectives, knowledge and experience and/or business interests and assets; and
- (m) any other information generated from your use of our services or your interaction with our website and Platform.

2.2. When you provide any Personal Data relating to any individual other than yourself, you undertake and warrant that:

- (a) you have the authority to provide such Personal Data to the SF Group;
- (b) the Personal Data provided is accurate and true;
- (c) you have informed the individual about the purposes for which his/her personal information is collected, used, disclosed or processed, as well as the parties to whom such personal information may be disclosed or transferred by the SF Group, as set out in this Data Protection Policy; and
- (d) the individual has consented to the collection, use and disclosure of his/her personal information for such purposes.

3. PURPOSES FOR COLLECTION, USE, DISCLOSURE AND/OR PROCESSING OF PERSONAL DATA

3.1. The Personal Data which we collect from you may be collected, used, disclosed and/or processed for various purposes, depending on the circumstances for which we may/will need to process your Personal Data, including :

- (a) considering and/or processing your application for an Account with the SF Group;
- (b) facilitating, processing, dealing with, administering, managing and/or maintaining your Account with the SF Group, including but not limited to executing your instructions with respect to any Transactions, processing your Orders, processing payments made to and from your Account and executing your instructions with respect to update of your company particulars and/or the list of authorised persons and their relevant Personal Data;
- (c) carrying out your instructions or responding to any enquiry given by (or purported to be given by) you or on your behalf;
- (d) contacting you or communicating with you via phone/voice call, text message and/or fax message, email and/or postal mail for the purposes of administering and/or managing your Account with the SF Group such as but not limited to sending you Daily Trading

Statement(s), Monthly Trading Statement(s) and/or Trade Confirmations/Summary Files and confirmation notices with respect to updating of your company particulars, the list of your authorised persons and their particulars;

- (e) dealing in any matters relating to the services which we are entitled to relating to your Account with the SF Group, including closing your Account;
- (f) carrying out operations which are in the SF Group's general legitimate interests, including but not limited to:
 - (i) carrying out due diligence or other screening activities (including anti-money laundering, counter-terrorist financing or anti-bribery, "know-your-client", credit and background checks) in accordance with legal or regulatory obligations or the SF Group's risk management procedures that may be required by law or that may have been put in place by the SF Group;
 - (ii) preventing or investigating any fraud, unlawful activity or omission or misconduct, whether relating to your Account with the relevant SF Group Entity or any other matter arising from your Account with the relevant SF Group Entity, and whether or not there is any suspicion of the aforementioned;
- (g) complying with or as required by any applicable law, governmental or regulatory requirements of any relevant jurisdiction, including meeting the requirements to make disclosure under the requirements of any law binding on the SF Group and/or for the purposes of any guidelines issued by regulatory or other authorities, whether in Singapore or elsewhere, with which the SF Group is expected to comply;
- (h) complying with or as required by any request or direction of any local or foreign government authority; or responding to requests for information from these public agencies, ministries, statutory boards or other similar authorities (including but not limited to the Monetary Authority of Singapore, Inland Revenue Authority of Singapore, and International Enterprise Singapore), self-regulatory organizations, relevant exchanges and clearing houses. For the avoidance of doubt, this means that the SF Group may/will disclose the Personal Data to the aforementioned parties upon their request or direction;
- (i) conducting research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve the SF Group's services and facilities in order to enhance your Account with the relevant SF Group Entity or for your benefit, or to improve any of the SF Group's services for the SF Group's benefit in general;
- (j) storing, hosting, backing up (whether for disaster recovery or otherwise) of your Personal Data, whether within or outside Singapore;
- (k) where you have consented, providing you with marketing, advertising and promotional information, materials and/or documents relating to products and/or services (including product and/or services of third party products or service providers which the SF Group may collaborate or tie up with) that the SF Group may be selling, marketing, offering or promoting, whether such products or services existing now or are created in the future (collectively the "**Marketing Purpose**") by way of phone or voice call, short message service, and/or facsimile, electronic mail, direct mailers, and or other mobile messaging services;
- (l) any other incidental purposes related to or in connection with the above; and
- (m) any other purposes which we notify you of at the time of obtaining your consent (collectively, the "**Purposes**").

4. DISCLOSURE OF PERSONAL DATA TO THIRD PARTIES

4.1. We may disclose your Personal Data:

- (a) where such disclosure is required for, or in connection with, the provision of our services;
- (b) to our third party service providers, agents and/or our affiliates or related corporations, and/or other third parties whether located in Singapore or outside of Singapore, for one or more of the above-stated Purposes;
- (c) to law enforcement agencies to comply with any applicable laws, regulations, codes of practice, guidelines, rules or requests by public agencies, or to assist in law enforcement and investigations;
- (d) to any other party to whom you authorised us to disclose your Personal Data to, or where necessary to undertake any action requested by you; and
- (e) to any other party as permitted under the PDPA.

5. REQUEST FOR ACCESS AND/OR CORRECTION OF PERSONAL DATA

- 5.1. You may request to access and/or correct the Personal Data currently in our possession or control by submitting a written request to us. We will need enough information from you in order to ascertain your identity as well as the nature of your request to effectively address your request.
- 5.2. For a request to access Personal Data, once we have sufficient information from you to ascertain your identity and address the request, we will seek to provide you with the relevant details within 30 days. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested. Note that the PDPA exempts certain types of Personal Data from being subject to your access request.
- 5.3. We reserve the right to charge you a reasonable fee for the handling and processing of your requests to access your Personal Data. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.
- 5.4. For a request to correct Personal Data, once we have sufficient information from you to ascertain your identity and address the request, we will correct your Personal Data within 30 days. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction. Note that the PDPA exempts certain types of Personal Data from being subject to your correction request.
- 5.5. Subject to paragraph **5.4**, we may, if you so consent, send the corrected Personal Data only to specific organisations to which the Personal Data was disclosed by us within a year before the date the correction was made.

6. REQUEST TO WITHDRAW CONSENT

- 6.1. You may withdraw your consent for the collection, use and/or disclosure of your Personal Data in our possession or under our control by submitting your request at the following [email: dpo@straitstimes.com](mailto:dpo@straitstimes.com). We will process your request within 30 days from such a request for withdrawal of consent being made, and will thereafter not collect, use and/or disclose your Personal Data in the manner stated in your request unless we may do so under applicable laws.
- 6.2. However, your withdrawal of consent could result in certain legal consequences arising from such withdrawal. In this regard, depending on the extent of your withdrawal of consent, it may mean that we will not be able to continue your existing relationship with us, or the contract you have with us will have to be terminated.

7. ADMINISTRATION AND MANAGEMENT OF PERSONAL DATA

- 7.1. We will take reasonable efforts to ensure that your Personal Data is accurate and complete, if your Personal Data is likely to be used by the SF Group to make a decision that affects you or disclosed to another organisation. However, this means that you must also update us of any changes in your Personal Data that you had initially provided us with. We will not be responsible for relying on inaccurate or incomplete Personal Data arising from your not updating us of any changes in your Personal Data that you had initially provided us with.
- 7.2. We will also put in place reasonable security arrangements to ensure that your Personal Data is adequately protected and secured. Appropriate security arrangements will be taken to prevent any unauthorized access, collection, use, disclosure, copying, modification, leakage, loss, damage, modification and/or disposal of your Personal Data. However, we cannot assume responsibility for any unauthorized use of your Personal Data by third parties which are attributable to factors beyond our control.
- 7.3. We will also put in place measures such that your Personal Data in our possession or under our control is destroyed and/or anonymized as soon as it is reasonable to assume that (i) the purpose for which that Personal Data was collected is no longer being served by the retention of such Personal Data; and (ii) retention is no longer necessary for any other legal or business purposes.
- 7.4. Where your Personal Data is to be transferred out of Singapore, we will further comply with the PDPA in doing so.

8. CONTACT US

- 8.1. If you have any complaint or query regarding how we are handling your Personal Data or about how we are complying with the PDPA, we welcome you to contact us with your complaint or query.
- 8.2. Please contact us through one of the following methods with your complaint or query:
- (a) Telephone : +65 6672 9669.
number
 - (b) E-mail : dpo@straitstimes.com

Attention it to the 'Data Protection Officer'.
 - (c) Office : 9 Temasek Boulevard, #28-03
address Suntec Tower Two, Singapore
038989

Attention it to the 'Data Protection Officer'
- 8.3. Where it is an email or a letter through which you are submitting a complaint, your indication at the subject header that it is a PDPA complaint would assist us in attending to your complaint speedily by passing it on to the relevant staff in our organisation to handle. For example, you could insert the subject header as "PDPA Complaint".
- 8.4. We will certainly strive to deal with any complaint or grievance that you may have speedily and fairly.

9. UPDATES ON DATA PROTECTION POLICY

- 9.1. As part of our efforts to ensure that we properly manage, protect and process your Personal Data, we will be reviewing our policies, procedures and processes from time to time. We recommend that you check this Data Protection Policy for updates from time to time.
- 9.2. We reserve the right to amend the terms of this Data Protection Policy at our absolute discretion. Any amended Data Protection Policy can be obtained from our website at www.straitsfinancial.com, or from your respective relationship manager, or you may request from dpo@straitsfinancial.com.

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