

Date: 31st December, 2015

MIZUHO ASIA PARTNERS -DATA PROTECTION POLICY-

The purpose of this document (“Data Protection Policy”) is to inform you of how Mizuho Asia Partners Pte. Ltd. manages personal data which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”).

By entering into any agreements with us, interacting with us, submitting information to us, or applying for any products or services offered by us, you agree and consent to Mizuho Asia Partners Pte. Ltd. (including its related corporations and business units) (collectively, the "Companies"), as well as our respective agents (collectively referred to herein as "Mizuho", "us", "we" or "our") collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to the Companies' authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

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

Mizuho may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with our future developments, industry trends and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of the Data Protection Policy as updated from time to time and as we may notify you of uploading onto our website. Please check back regularly for updated information on the handling of your Personal Data.

1. Personal Data

- 1.1 In this Data Protection Policy, “Personal Data” refers to any 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 we have or are likely to have access, including data in our records as may be updated from time to time.
- 1.2 Examples of such Personal Data you may provide to us include (depending on the nature of your interaction with us) your name, passport or other identification number, telephone number(s), mailing address, email address and any other information relating to any individuals which you have provided us in any forms you may have submitted to us, or via other forms of interaction with you.

2. Collection of Personal Data

- 2.1 Generally, we collect Personal Data in the following ways:
 - (a) when you submit forms or applications to us in the course of our relationship;
 - (b) when you submit queries, requests, complaints or feedback to us;

- (c) when you interact with our staff and/or representatives, e.g. via telephone calls, letters, fax, face-to-face meetings and email;
 - (d) when your images are captured by us in the form of any photographs or videos while you are within our premises or when you attend our events;
 - (e) when you use any of our services;
 - (f) when you are contacted by, and respond to, our representatives and agents and other service providers;
 - (g) when you respond to our request for additional Personal Data;
 - (h) when you ask to be included in an email or other mailing list;
 - (i) when we receive instructions from a third party lender to collect your personal data to facilitate the provision and administration of banking facilities
 - (j) when we receive your personal data from business partners, public agencies, your employer and other third parties in connection with your relationship with us, including for services insurance policies or job applications; and
 - (k) when you submit your Personal Data to us for any other reasons.
- 2.2 When you browse our website, you generally do so anonymously but please see the section below on cookies. We do not at our website automatically collect Personal Data, including your email address unless you provide such information or login with your account credentials.
- 2.3 If you provide us with any Personal Data relating to a third party (e.g. information concerning employees, directors, authorised persons, and/or family members), by submitting such information to us, you represent to us that you have obtained the consent of that third party to you providing us with their Personal Data for the purposes stated in this Data Protection Policy.
- 2.4 You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to fulfil your requests and/or applications.

3. **IP Address**

- 3.1 An IP address is a number that is assigned by your Internet Service Provider to your device when you connect to the internet.
- 3.2 When you visit our website, your IP address is automatically logged in our server. We use your IP address to help diagnose problems with our server, and to administer our website. From your IP address, we may identify the general geographic area from which you are accessing our website. However, we will not be able to pinpoint the exact geographic location from which you are accessing our website. Generally we do not link your IP address to anything that can enable us to identify you unless it is required by applicable laws and regulations.

4. Information on Cookies

- 4.1 A cookie is an element of data that a website can send to your browser, which may then store it on your system. We use cookies in some of our pages to store visitors' preferences and record session information.
- 4.2 The information that we collect is then used to ensure a more personalised service level for our users. You can adjust settings on your browser so that you will be notified when you receive a cookie. Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain part(s) of our website, and some of the functions and services may not be able to function without cookies.
- 4.3 Please refer to your browser documentation to check if cookies have been enabled on your computer or to request not to receive cookies.

5. Purposes for the Collection, Use and Disclosure of Your Personal Data

5.1 **Generally**, Mizuho collects, uses and discloses your Personal Data for the following purposes:

- (a) verifying your identity;
- (b) responding to your queries, requests, complaints and feedback;
- (c) processing your instructions;
- (d) managing the administrative and business operations of Mizuho and complying with internal policies and procedures;
- (e) facilitating business asset transactions (which may extend to any mergers, acquisitions and debt or asset sales) involving Mizuho;
- (f) matching any Personal Data held which relates to you for any of the purposes listed herein;
- (g) preventing, detecting and investigating crime, including terrorist financing, fraud and money-laundering, and analysing and managing commercial risks;
- (h) maintaining the security of the Company's premises
- (i) managing ad hoc projects and initiatives;
- (j) generating reports and analytics in relation to our products and services;
- (k) conducting our due diligence;
- (l) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes
- (m) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on Mizuho or to assist in law enforcement and investigations by relevant authorities (including but not limited to disclosures to regulatory bodies, conducting audit checks, surveillance and investigation);
- (n) legal purposes (including but not limited to drafting and reviewing documents, obtaining legal advice and facilitating dispute resolution); and

(o) purposes which are reasonably related to the aforesaid.

5.2 **In addition**, Mizuho collects, uses and discloses your Personal Data for the following purposes depending on the nature of our relationship with you:

(a) If you are the owner, chairman, director, employee, mandatee, authorised signatory or guarantor of an organisation that is our customer (ie: investor / investee), collects, uses and discloses your Personal Data for the following purposes:

- (i) facilitating the continuation or termination of the relationship and/or the provision of the investment advisory and/or investment management services we manage;
- (ii) carrying out client reviews, for example, annual reviews of your portfolio;
- (iii) to establish your risk profile, investment experience and investment objectives to help you consider the suitability of the products you have invested or intend to invest;
- (iv) relationship management
- (v) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on the Company
- (vi) archival management
- (vii) administering and facilitating any transactions dealing with securities or investments
- (viii) facilitating the transfer of funds within the Company's bank accounts or from the Company's bank accounts to external bank accounts and vice versa;

(b) If you are a counterparty to a transaction (for example, a beneficiary of a fund transfer or payment) or a contractual agreement, the Company collects, uses and discloses your Personal Data for the following purposes:

- (i) providing cash and transactional services;
- (ii) drafting and reviewing of contracts and agreements; and
- (iii) purposes which are reasonably related to the aforesaid.

(c) If you are an employee, officer or owner of an external service provider which has been engaged, outsourced or prospected by Mizuho, Mizuho collects, uses and discloses your Personal Data for the following purposes:

- (i) processing and payment of vendor invoices; and
- (ii) complying with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities (which includes disclosure to regulatory bodies or audit checks);
- (iii) purposes which are reasonably related to the aforesaid.

- (d) If you submit an application to us as a candidate for an employment or representative position, Mizuho collects, uses and discloses your Personal Data for the following purposes:
 - (i) conducting interviews;
 - (ii) processing your application (including pre-recruitment checks involving your qualifications and facilitating interviews);
 - (iii) providing or obtaining employee references and for background screening;
 - (iv) processing employment pass applications, visa applications and offer of employment;
 - (v) evaluating and assessing your suitability for the position applied for; and
 - (vi) any other purposes reasonably related to any of the above.
- (e) If you are a visitor to Mizuho office:
 - (i) facilitating your visit to our premises, including verifying your identity;
 - (ii) facilitating and organising training events and seminars held on our premises; and
 - (iii) any other purposes reasonably related to any of the above

5.3 In addition, where permitted under the Act or where you have specifically consented to the same, Mizuho may also collect, use and disclose your Personal Data as follows:

- (a) organising promotional and corporate events;
- (b) sending you details of products, services, special offers and rewards, either to our customers generally, or which we have identified may be of interest to you;;
- (c) leads generation and management;
- (d) providing cross-referrals to other members of the Mizuho Group; and
- (e) conducting market research, understanding and determining customer location, preferences and demographics for us to review, develop and improve our products, services and also develop special offers and marketing programmes.

5.4 In relation to particular products or services or in your interactions with us, we may also have specifically notified you of other purposes for which we collect, use or disclose your Personal Data. If so, we will collect, use and disclose your Personal Data for these additional purposes as well, unless we have specifically notified you otherwise.

6. Disclosure of Personal Data

6.1 Your Personal Data held by us shall be kept confidential. However, in order to provide you with effective and continuous products and services, and for the purposes listed above (where applicable), your Personal Data may be disclosed to the following:

- (a) entities within Mizuho and our related corporations;
- (b) agents, contractors or third party service providers who provide operational services to Mizuho, such as courier services, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, fund administration or other services to the Company;
- (c) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any mergers, acquisitions and debt or asset sale) involving the Company;
- (d) external banks, credit card companies and their respective service providers;
- (e) our professional advisers such as financial advisors, auditors and lawyers;
- (f) travel agencies in relation to facilitating overseas travel arrangements;
- (g) foreign embassies in relation to visa applications;
- (h) relevant government regulators, government ministries, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority including but not limited to the Inland Revenue Authority of Singapore, the Monetary Authority of Singapore, Singapore Exchange Limited, the Accounting and Corporate Regulatory Authority, and the Insolvency and Public Trustee Office;
- (i) counterparties, billing organisations and their respective banks in relation to fund transfers, payments and letters of guarantee;
- (j) brokerage houses, fund houses, registrars, custodians, external banks and investment vehicles in relation to asset management and investment product settlement processing;
- (k) surveyors, auctioneers, valuers or other third parties in relation to loans and other credit facilities such as mortgages;
- (l) companies and brokers providing insurance products and services;
- (m) collection and repossession agencies in relation to the enforcement of repayment obligations for loans;
- (n) credit reporting agencies;
- (o) external business, referral and charity partners in relation to privileges, gift redemptions, loans and corporate promotional events;
- (p) any other party to whom disclosure of personal data is reasonably necessary for the purpose of managing, maintaining or terminating the relationship or providing you with our products and services; and

- (q) any other party to whom you authorise us to disclose your Personal Data to.

7. **Contacting Us – Withdrawal of Consent, Access and Correction of your Personal Data**

7.1 If you:

- (a) have any questions or feedback relating to your Personal Data or our Data Protection Policy;
- (b) would like to withdraw your consent to any use of your Personal Data as set out in this Data Protection Policy; or
- (c) would like to obtain access and make corrections to your Personal Data records,

please contact Mizuho as using form provided in our website

7.2 If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, Mizuho may not be in a position to continue to provide its products or services to you, administer any contractual relationship in place, may be considered a termination by you of any contractual relationship which you may have with Mizuho, and your being in breach of your contractual obligations or undertakings, and Mizuho's legal rights and remedies in such event are expressly reserved.

7.3 Please note that if your Personal Data has been provided to us by a third party, you should contact such party directly to make such queries, complaints, and access and correction requests to Mizuho on your behalf.

----- *End of Data Protection Policy* -----