

Privacy Notice - Singapore

1 December 2023

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1 PURPOSE

Perpetual is committed to protecting your privacy and safeguarding your personal information.

This privacy notice explains how Perpetual manages and protects personal information, including:

- what personal information Perpetual collects
- how Perpetual collects and stores personal information
- how Perpetual uses personal information
- how personal information can be disclosed to others
- how you may access or correct your personal information
- how you can complain if you have concerns about how Perpetual has managed your personal information.

Perpetual has practices in place to comply with the key obligations of the Singapore Personal Data Protection Act 2012 (PDPA). These obligations govern how organisations handle personal information.

2 SCOPE

This Notice applies to Perpetual (Asia) Limited (Company Registration No. 200518022M) and its related bodies corporate located in Singapore (“**Perpetual Singapore**”). This Notice applies to any and all forms of use (“processing”) of personal information by us in Singapore if you are a former, current or prospective client of Perpetual Singapore.

3 PRIVACY NOTICE

WHAT PERSONAL INFORMATION DOES PERPETUAL COLLECT?

Personal data is information or an opinion about you from which you can be reasonably identified (“**Personal Data**”). The Personal Data Perpetual Singapore may collect about you will depend on the circumstances of collection, including whether we collect the information from you as a customer, supplier, contractor, stakeholder, job applicant or in some other capacity.

Perpetual Singapore collects Personal Data so that we can provide you with our products and services and comply with our legal and regulatory obligations. If Perpetual Singapore does not collect your Personal Data, we may not be able to provide you with a product or service.

The product or service that we are providing will also determine what information we will collect about you. The kinds of Personal Data that Perpetual Singapore may collect and hold about you include: your name, contact details, date of birth, citizenship, individual identification number (NRIC and/or passport), employment details, financial information and banking details. In some cases, we may collect information about your family (eg details related to your spouse, dependents or beneficiaries where we are providing you with related services).

For prospective clients with whom we have not yet made contact, we may collect (to the extent permitted by applicable law):

- business contact details of a company representative with whom we deal;
- personal identification details (such as name, address, gender, nationality), contact information (such as telephone, e-mail address), and family details (such as marital status);
- information related to the professional profile (such as directorship / positions and professional networks) and information related to company ownership and financial background.

For former and current clients or prospective clients with whom we are taking steps to enter into a contractual relationship, we collect (to the extent permitted by applicable law):

- personal details such as your name, identification number, date of birth, compliance related documents (including a copy of your national identity card or passport), phone number, address and domicile, electronic address, and

family details such as the name of your spouse or partner;

- financial information, including payment and transaction records and information relating to your assets (including fixed properties), financial statements, liabilities, taxes, revenues, earnings and investments (including your investment objectives);
- tax domicile and other tax-related documents and information;
- where relevant, professional information about you, such as your job title and work experience;
- your knowledge of and experience in investment matters;
- details of our interactions with you and the products and services you use, including electronic interactions across various channels such as e-mails and mobile applications;
- any records of phone calls between you and Perpetual Singapore, specifically phone log information such as your phone number, calling-party number, receiving-party number, forwarding numbers, time and date of calls and messages, duration of calls, routing information, and types of calls;
- where relevant, details of your nomination of a mandate;
- identifiers we assign to you, such as your client, business relation, partner or account number, including identifiers for accounting purposes;
- when you access Perpetual websites or our applications, data transmitted by your browser or device you are using and automatically recorded by our server, including date and time of the access, name of the accessed file as well as the transmitted data volume and the performance of the access, your device, your web browser, browser language and requesting domain, and IP address (additional data will only be recorded via our website if their disclosure is made voluntarily, e.g., in the course of a registration or request). When you visit a Perpetual website, that website will contain additional information about how we use your information while you are visiting that website; and
- in some cases (where permitted by law), special categories of Personal Data, such as your biometric information or political affiliations, and, to the extent legally possible, information relating to criminal convictions or offences.

Where you are an institutional or corporate client or investor, we may also collect information about your directors, representatives, employees, shareholders, or beneficial owner. Before providing Perpetual Singapore with this information, you should provide a copy of this Notice to those individuals.

We may use Personal Data for analytics and measurement (incl. machine learning) to process the above information, including profiling based on the processing of your Personal Data, for instance by looking at information we obtain via cookies and tracking technologies.

In some cases, we collect this information from public registers (which, depending on the product or service you receive and the country of the Perpetual entity with which you have a contractual relationship, may include beneficial ownership and other registers), public administration or other third-party or public sources, such as wealth screening services, credit reference agencies, fraud prevention agencies, intermediaries that facilitate data portability, and other Perpetual Group entities.

In the context of Perpetual Singapore's recruitment process for employees and contractors, we may collect and hold the following kinds of Personal Data about you: your name, contact details, date of birth, citizenship, employment references, civil, credit and criminal records, regulatory accreditation (such as MAS and/or IBF accreditation), media (including social media), directorships, property ownership and driver's licence information, education, employment history and credential variation.

In the employment context, we may also collect and hold the Personal Data listed above, as well as your individual identification number (NRIC and/or passport), financial information, banking details, and other Personal Data that may be

collected in your use of Perpetual Singapore systems or assets. This information may be collected to assist us in monitoring compliance with our internal policies and perform other necessary functions and activities.

Generally, we will not collect sensitive information about you (such as your race, political beliefs or religion). We may collect information about your health if necessary to provide you with a product or service. If we need sensitive information, we will ask for your consent when we collect this information (unless an exemption applies).

FOR WHICH PURPOSES DOES PERPETUAL PROCESS PERSONAL DATA?

I. PURPOSES OF PROCESSING

We always process your Personal Data for a specific purpose and only process the Personal Data which is relevant to achieve that purpose. In particular, we process Personal Data, within applicable legal limitations, for the following purposes:

a) Client Onboarding. For example:

- to verify your identity and assess your application for services. For legal and regulatory compliance checks (for example, to comply with anti-money laundering regulations, and prevent fraud), please see Section e) below.

b) Client Relationship Management. For example, to:

- manage our relationship with you, including communicating with you in relation to the products and services you obtain from us and from our business partners, handling customer service-related queries and complaints, facilitating debt recovery activities, making decisions regarding transactions or your identity, tracing your whereabouts, and terminating our services (in accordance with applicable law) if the relationship remains dormant and we are unable to contact you after a period of time;
- help us to learn more about you as a client, your preferences on the products and services you receive, and other products and services - including those offered by us, Perpetual Group entities, and our business partners - you may be interested in receiving, including profiling based on the processing of your Personal Data, for instance by looking at the types of applications, platforms, products and services that you use from us, information we obtain via tracking technology and how you like to be contacted;
- collect and analyse your individualized and personal or anonymous and group-based activity and potential interests in the use of our products and services and of Perpetual websites.

c) Product implementation and execution. For example, to provide products and services to you and ensuring their proper execution, for instance by ensuring that we can identify you and make payments to and from your accounts in accordance with your instructions and the product / service terms.

d) Engaging in prospecting and business development and / or protecting and enhancing the Perpetual brand. For example, to:

- evaluate whether and how Perpetual may offer products, services and events - including those offered by us, Perpetual Group entities, and our other business partners - that may be of interest to you; and
- contact you for direct marketing purposes about products and services we think will be of interest to you, including those offered by us, Perpetual Group entities, and our other business partners.

e) Compliance and Risk Management and / or Crime Prevention, Detection and Investigation. For example, to:

- carry out legal and regulatory compliance checks as part of the onboarding process, including to comply with anti-money laundering regulations and fraud prevention;
- meet our on-going regulatory and compliance obligations (e.g., laws of the financial sector, antimoney laundering and tax laws), including in relation to recording and monitoring communications, apply a risk classification to ongoing business relationships, disclosures to tax authorities, financial service regulators and other regulatory, judicial and governmental bodies or in proceedings and investigating or preventing crime;

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- receive and handle complaints, requests or reports from you or third parties made to designated units within Perpetual or the Perpetual Group;
 - reply to any actual or potential proceedings, requests or the inquiries of a public or judicial authority;
 - prevent and detect crime, including fraud or criminal activity, misuses of our products or services as well as the security of our IT systems, architecture and networks;
 - undertake transactional and statistical analysis, and related research.

f) Supporting, Enhancing and Maintaining Perpetual's technology. For example, to:

- take steps to improve our products and services and our use of technology, including testing and upgrading of systems and processes, and conducting market research to understand how to improve of our existing products and services or learn about other products and services we can provide;
- analyse the results of our marketing activities to measure their effectiveness and relevance of our campaigns.

g) Other purposes. For example:

- for the Perpetual Group's prudent operational management (including risk management, technological support services, reporting, insurance, audit, systems and products training and administrative purposes);
- to enable a transfer, merger or disposal to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer, merger or disposal of part or all of Perpetual's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- to collect data to ensure the security of buildings, the safety of staff and visitors, as well as property and information located, stored on or accessible from the premises, to prevent, and if necessary,
- investigate unauthorized access to secure premises (e.g., maintaining building access logs and CCTV system images to prevent, detect and investigate a theft of equipment or asset owned by Perpetual, visitor or staff, or threats to the safety of personnel working at the office);
- testing and calibrating analytical models. In such case only pseudonymized data are used;
- to exercise our duties and/or rights vis-à-vis you or third parties.

II. BASIS FOR PROCESSING PERSONAL DATA

Depending on the purpose of the processing activity above, the legal basis for the processing of your Personal Data will be one of the following:

- necessary to perform our contractual obligations towards you or to enter into or conclude a contract with you or for carrying out our obligations under such a contract;
- necessary to comply with our legal or regulatory obligations that are required by law, such as tax reporting requirements;
- necessary to protect the vital interests of the relevant individual or of another natural person, such as responding to an emergency that threatens the health or safety of the individual or another natural person;
- necessary for business improvement purposes to the extent permitted under the PDPA, such as to improve new processes for business operations in relation to Perpetual Singapore's services;
- where we have obtained your prior consent;
- necessary for one or more of the specific purposes deemed by law to be in the legitimate interests of organisations (PDPA, First Schedule, Part 3, Para 2-10 - "Prescribed Legitimate Interests"). Some of these Prescribed Legitimate Interests which are necessary for Perpetual Singapore include the following:

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- i. for investigation or proceedings (including the establishment, exercise or defence of a legal claim);
 - ii. for Perpetual Singapore to obtain legal services.
- necessary for the general legitimate interests of Perpetual Singapore, without unduly affecting your interests or fundamental rights and freedoms (PDPA, First Schedule, Part 3, Para 1 - “General Legitimate Interests”). Examples include processing necessary to:
 - i. manage our relationship with you and to help us to learn more about you as a client, the products and services you receive, and other products and services you may be interested in receiving (with the exception of direct marketing, i.e., sending of unsolicited marketing material for which we would obtain your consent);
 - ii. evaluate whether and how Perpetual Singapore may offer products, services and events that may be of interest to you;
 - iii. prevent fraud or criminal activity, misuses of our products or services as well as the security of our information, IT systems, architecture and networks and security of Perpetual Singapore premises;
 - iv. receive and handle complaints, requests or reports from you or third parties made to Perpetual Singapore or the Perpetual Group;
 - v. take steps to improve our products and services and our use of technology and to conduct market research;
 - vi. cooperate with a request made in any actual or potential proceedings or the inquiries of a public or judicial authority;
 - vii. make disclosures for the purposes referred to in Section 5 below, such as providing products and services and assuring a consistently high service standard across the Perpetual Group, and
 - viii. keeping our clients, employees and other stakeholders satisfied.

HOW DOES PERPETUAL COLLECT AND STORE PERSONAL DATA?

I. COLLECTING INFORMATION

Depending on how you choose to interact with us, we may collect your Personal Data when you contact us or our service providers by telephone, by email, through our web site, complete an application or registration form, or when you meet one of our representatives face to face. Perpetual Singapore may also collect information about you from third parties. For example, Perpetual Singapore may collect Personal Data from:

- your authorised representatives and advisor(s)
- our service providers
- your employer
- our corporate clients, where we are providing services to them
- referees, in the case of prospective employees.

II. COLLECTING INFORMATION FROM VISITS TO PERPETUAL’S WEBSITE

Perpetual may collect information based on how you use Perpetual’s website. Perpetual uses “cookies” and other data collection methods such as pixel tags to collect information on website activity such as the number of visitors, the number of pages viewed and the internet advertisements which bring visitors to our site. This information is collected to analyse and improve our website, our marketing campaigns and to record statistics on web traffic. No attempt is made by Perpetual to use this information to personally identify you.

If you access your account information online through one of the secure areas of Perpetual’s website, we will collect

information about your visit using cookies to track your use of our website and to allow you to effectively access your account information. This information is collected for security purposes and to protect the integrity of your account details. Please refer to the following link for Additional Website Privacy Information. <https://www.perpetual.com.sg/privacy--terms/>

III. SECURING YOUR PERSONAL DATA

We hold Personal Data in secure computer storage facilities (both in-house and at our service providers); on paper-based files; as well as in other formats. Perpetual Singapore takes reasonable steps to protect your information from loss and unauthorised access, destruction, use, modification or disclosure. Access to Personal Data held by Perpetual Singapore is controlled to prevent misuse or unauthorised disclosure of the information. We utilise a range of technical security measures such as secure authentication, password controls, encryption, firewalls and anti-virus technology to prevent unauthorised access to your information.

HOW DOES PERPETUAL USE YOUR PERSONAL DATA?

Perpetual Singapore may collect, hold, use or disclose your Personal Data to provide you, and our corporate clients, with a range of products and services, such as:

- providing our corporate clients with trust, fund or fiduciary services.

We may also collect, hold, use or disclose your Personal Data to:

- consider any concern or complaint that you raise against Perpetual Singapore and/or to manage any legal action between you and Perpetual Singapore
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct
- identify you or establish your tax status under any Singapore or foreign legislation
- comply with any relevant laws, regulations, codes of practice and court orders
- consider job applicants for employment.

Personal Data collected about you may be used by different companies within the Perpetual group, but only if this is necessary for us to provide you with our products or services.

Perpetual Singapore may use your Personal Data that we have collected about you to identify a product or service that may be of interest to you. If at any time you no longer wish to be notified about other Perpetual products or services, please contact us. Privacy specific contact details are included at the end of this Notice.

We may also use your information for other purposes required or authorised by or under law (including purposes for which you have provided your consent).

HOW IS PERSONAL DATA DISCLOSED TO OTHERS?

Perpetual Singapore does not sell, rent or trade Personal Data to, or with, third parties. In some circumstances your information may be disclosed to Perpetual Singapore's related entities, service providers, professional advisers and consultants to perform the business relationship with you. In particular, when providing products and services to you, we will share personal data with persons acting on your behalf or otherwise involved (depending on the type of product or service you receive from us), including, where relevant:

- mailing houses and printing companies
- fund and investment administrators/managers
- lawyers, auditors, accountants, and insurers providing legal, audit, consultancy, accounting or insurance services to us
- issuers of securities (including third parties appointed by them) in which you have an interest, where such securities are held by third party banks for you

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- payment recipients, beneficiaries, account nominees, intermediaries, correspondent and agent banks (including custodian banks)
 - custodians and brokers
 - registry and platform providers
 - insurance providers
 - Information Technology vendors
 - other consultants.

In some circumstances, Personal Data may be disclosed to Perpetual Singapore related entities and third parties in jurisdictions including, but not limited to, Australia, New Zealand, Singapore, United Kingdom, Ireland, the Netherlands, the United States of America, India, Japan and Canada.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use Personal Data in order to perform the functions required by Perpetual Singapore.

Depending on the nature of the product or service that we are providing, we may disclose your Personal Data to your nominated representatives (eg your financial adviser) and their respective service providers.

We may also disclose your Personal Data to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements, by applicable law or regulation, under a code of practice or conduct, at their request, or to safeguard our legitimate interests. In particular, if you are a shareholder of Perpetual Limited, the Corporations Act 2001 of Australia requires certain information to be included in Perpetual Limited's register which is able to be accessed by the public.

Where necessary, we may disclose Personal Data to a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of Perpetual's business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it; and any legitimate recipient required by applicable laws or regulations.

With your consent, we may also disclose your Personal Data to other third parties and for other purposes. That consent may be written, verbal or implied from your conduct.

Data transfers to other countries. The Personal Data transferred within, or outside Perpetual Singapore and the Perpetual Group is in some cases also processed in other countries. We only transfer your Personal Data abroad to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that guarantees adequate protection, based on appropriate safeguards (e.g., standard contractual clauses adopted by the European Commission to the extent recognized by the competent Data Protection Authority or another statutory exemption) provided by local applicable law. Perpetual Singapore and the Perpetual Group ensure that their third-party service providers take steps to implement, technical and organisational measures to safeguard your Personal Data against unauthorized processing.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on its purpose.

As far as necessary, we will keep your data for the duration of our contractual relationship subject to applicable legal and regulatory requirements. In addition, we might process your data after the termination of our contractual relationship for operational purposes in accordance with the applicable laws as well as pursuant to various retention and documentation obligations.

HOW YOU MAY ACCESS OR CORRECT YOUR PERSONAL DATA

We are committed to keeping your Personal Data accurate and up to date. Therefore, if your Personal Data changes, please inform us of the change as soon as possible.

You may contact us to request access to the Personal Data we hold about you at any time. You may also ask us to correct information about you that you may believe is inaccurate, incomplete or out of date. We will need to verify your identity before giving you access or correcting your information.

In certain circumstances, Perpetual Singapore may not be able to correct or provide you with access to your information. In these circumstances, we will write to you to explain and provide the reasons why.

HOW YOU MAY COMPLAIN IF YOU HAVE CONCERNS ABOUT HOW PERPETUAL HAS MANAGED YOUR PERSONAL DATA

If you have a complaint related to how Perpetual Singapore has managed your Personal Data, please contact us using the contact information below. We may ask you to place your concerns in writing in order for us to fully understand and investigate the issues you have raised. We will acknowledge any complaint within five business days of it being received and make every effort to resolve your issue within a reasonable time of us being notified.

4 UPDATES

We reserve the right to amend this Notice from time to time. Please visit the Perpetual Singapore website frequently to understand the current Notice, as the terms of this Notice are closely related to you.

5 NEED MORE INFORMATION?

If you have any questions about this Notice, if you wish to complain about how we handled Personal Data about you, or if you wish to access or correct your Personal Data, please contact Perpetual Singapore's Data Protection Officer:

Data Protection Officer, Perpetual (Asia) Limited
MARINA BAY FINANCIAL CENTRE, 8 MARINA BOULEVARD, #05-02,
SINGAPORE 018981
Telephone: +65 6908 8203
E-mail: contact@perpetual.com.sg

About Perpetual

Perpetual Limited ("Perpetual") is an ASX listed (ASX:PPT) global financial services firm operating a multi-boutique asset management business, as well as wealth management and trustee services businesses.

Perpetual owns leading asset management brands including Perpetual, Pental, Barrow Hanley, J O Hambro, Regnan, Trillium and TSW.

Perpetual's wealth management business services high-net worth clients, not for profits, and small businesses through brands such as Perpetual Private, Jacaranda Financial Planning and Fordham.

Perpetual's corporate trust division provides services to managed funds, the debt market and includes a growing digital business, encompassing Laminar Capital.

Headquartered in Sydney, Perpetual services its global client base from offices across Australia as well as internationally from Asia, Europe, the United Kingdom and United States.

perpetual.com.au