

CAPMARKET – DATA PROTECTION

The purpose of this document (“Data Protection Policy”) is to inform you of how CAPMARKET PTE. LTD. manages Personal Data which is subject to the Singapore Personal Data Protection Act (No. 26 of 2012) (“the Act”). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or entering into any business transaction with us, you agree and consent to CAPMARKET PTE. LTD. (including our related corporations and business units) (collectively, the “Companies”), as well as our respective representatives and/or agents (collectively referred to herein as “CapMarket”, “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 you may have previously provided to us 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.

We 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.

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, NRIC, passport or other identification number, telephone number(s), mailing address, email address, network data 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 enter into any transaction relating to any of our Products and Services (defined below);
 - b) when you interact with our employees, for example, via telephone calls, letters, face-to-face meetings and emails;
 - c) when you request that we contact you, be included in an email or other mailing list;
 - d) when you respond to our promotions, initiatives or to any request for additional Personal Data;
 - e) when you are contacted by, and respond to, our marketing representatives and customer service officers;
 - f) when we receive references from business partners and third parties, for example, where you have been referred by them;

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- g) when we seek information from third parties about you in connection with the Products and Services you have applied for; and
 - h) 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 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 of your spouse, children, parents, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 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 provide you with the Products and Services you have requested.

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

- 3.1. Generally, CapMarket collects, uses and discloses your Personal Data for the following purposes:
- a) responding to your queries and requests;
 - b) managing the administrative and business operations of CapMarket and complying with internal policies and procedures;
 - c) facilitating business transactions involving any of the Companies;
 - d) matching any Personal Data held which relates to you for any of the purposes listed herein;
 - e) resolving complaints and handling requests and enquiries;
 - f) preventing, detecting and investigating crime and analysing and managing commercial risks;
 - g) monitoring or recording phone calls and customer-facing interactions for quality assurance, employee training and performance evaluation and identity verification purposes;
 - h) legal purposes (including but not limited to obtaining legal advice and dispute resolution);
 - i) conducting investigations relating to disputes, suspected illegal activities or fraud;
 - j) 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 CapMarket (including but not limited to responding to regulatory complaints, disclosing to regulatory bodies and conducting audit checks, due diligence and investigations); and
 - k) purposes which are reasonably related to the aforesaid.
- 3.2. In addition, CapMarket collects, uses and discloses your Personal Data for the following purposes:
- a) opening or continuation of accounts and establishing or providing you with provision of bridging loans, term loans, invoice factoring and other financing (collectively the “**Products and Services**”);
 - b) facilitating the continuation or termination of your utilisation of our Products and Services (including but not limited to account maintenance, account closure, processing renewal of contracts and customer relationship management);

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- c) processing of payment instructions, direct debit facilities and/or credit facilities requested by you;
- d) enforcement of repayment obligations (including but not limited to debt collection, filing of claims and retrieval of payments from losses made by service partners);
- e) credit and internal risk management (including but not limited to performing credit checks and disclosures to law enforcement agencies);
- f) generating internal reports (including but not limited to annual, operational and management reports);
- g) processing referral payments and commission fees to our external partners;
- h) administering fee adjustments, refunds and waivers; and
- i) purposes which are reasonably related to the aforesaid.

4. Disclosure of Personal Data

CapMarket will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed, for the purposes listed above (where applicable), to the following:

- a) CapMarket's related corporations and employees to provide content, Products and Services to you, address your questions and requests in relation to your customer accounts;
- b) agents, contractors or third party service providers who provide operational services to CapMarket, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, training, market research, call centre, security or other services to CapMarket;
- c) any business partner, investor, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving any of the Companies;
- d) collection and repossession agencies in relation to the enforcement of repayment obligations for debts;
- e) credit bureaus for the purpose of preparing credit reports or evaluation of creditworthiness;
- f) external banks, credit card companies and their respective service providers;
- g) our professional advisers such as auditors and lawyers;
- h) relevant government regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
- i) any other party to whom you authorise us to disclose your Personal Data to.

5. Use of Cookies

5.1. A cookie is a small piece of information that is placed on your computer when you visit certain websites.

5.2. CapMarket uses cookies on its websites for the following purposes:

- a) improving the efficiency of our website;

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- b) administering services to you and to advertisers; and
 - c) establishing usage statistics.
- 5.3. Most internet browsers provide you the option of turning off the processing of cookies (please see the “help” section of your browser), but this may result in the loss of functionality, restrict your use of the website and/or delay or affect the way in which it operates.
- 5.4. Advertisements on the CapMarket website may be provided by third party advertisers and their agencies. These may generate cookies to track how many people have seen a advertisement (or use the services of third parties to do this), and to track how many people have seen it more than once. CapMarket does not control these third parties and their cookie policies and if you have questions about their cookie policies, please contact CapMarket and we will try our best to assist by providing you information about these third party advertising agencies.
- 5.5. CapMarket is not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party websites linked to the CapMarket website.

6. Governing Law

This Data Protection Policy and your use of this website shall be governed in all respects by the laws of Singapore.