

Jefferies Singapore Privacy Notice

1. Introduction

This Privacy Notice explains how Jefferies Singapore Limited and each branch, affiliate and/or subsidiary in the Jefferies Group operating in Singapore (together “we” “our” or “us”) processes personal data.

“Personal data” is information about an individual who can be identified from that data or from that data and other information to which we have or are likely to have access. This Notice applies to our existing and prospective clients, suppliers, personnel of entities we engage with, website users and any other individuals whose personal data we may process in the course of our commercial activities. We refer to these individuals as “you” in this Notice.

Jefferies respects your privacy, is committed to protecting your personal data and will handle your personal data in accordance with applicable data protection law. For the purposes of applicable data protection legislation in your jurisdiction, the entity responsible for your personal data is Jefferies Singapore Limited. Contact details for this entity can be found in Section 11 of this Notice.

Please note that we may amend this Privacy Notice from time to time and any changes will be posted on this page.

2. What types of personal data do we collect?

We will collect your contact details (name, telephone numbers, job title and email or postal addresses) when you engage with us in connection with our or your services in order to ensure our relationship runs smoothly. Where we are required to carry out verification checks, to comply with our legal and regulatory obligations, we will collect specific additional information about relevant individuals (such as directors and beneficial owners), including, for example, date of birth, payment details, tax residence information, copies of photo identification documents (such as a driving licence and/or passport/identity card), information about nationality/citizenship/place of birth, national identification numbers and other identity verification documents. We may also hold information that another person within your organisation has chosen to provide us.

Where existing or prospective corporate clients/vendors provide us with personal data relating to their directors, employees, officers, agents, clients or any other person, such information is deemed to have been provided on the basis that: (i) those individuals have been informed and understand that their personal data is being provided to us or our affiliates; (ii) those individuals have been provided with information regarding the collection, use, processing, disclosure and overseas transfer of their personal data; (iii) the client/vendor has a lawful basis (in accordance with applicable data protection laws and regulations) to provide such personal data to us; and (iv) those individuals are aware of their data protection rights and how to exercise them.

If you are an individual client we will collect personal data you provide when you: (i) apply for your account and are onboarded as a client; (ii) request or engage with us in connection with our services; and (iii) interact with us in relation to the management and administration of your account. The personal data you give us may include your name, postal address, e-mail address, phone number, financial information, bank account/payment details, identification documents and other relevant personal details.

We may also collect information relating to your online engagement with regard to material that we publish, which we use to ensure that our relationship management communications to you are relevant and timely and, where such material is subject to charges for accessing it, that you are charged the correct amount. In certain circumstances, calls with you may be recorded and monitored (to ensure compliance with regulatory obligations), depending on the applicable local laws and requirements.

We do not collect or otherwise process sensitive personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or criminal conviction/offence data unless it is necessary for

compliance with a legal and/or regulatory obligation.] We may request you to complete COVID vaccination status check enquiries where you attend a Jefferies in person meeting/event, in accordance with applicable laws.

To the extent that you access our website we may also collect certain data from you via cookies, further details of which can be found in Section 10.

If we are unable to collect some of the personal information we seek, then we may not be able to do the things described in Section 4, and this may limit our ability to provide services to you or receive services from you.

3. How do we collect your personal data

3.1 *Personal data that we receive directly from you*

We will receive personal data directly from you in two ways:

- Where you contact us proactively, usually by corresponding with us by phone or email or by filling in forms; and/or
- Where we contact you, either by phone or email, or through investment activities more generally.

3.2 *Personal data we receive from other sources*

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources by way of due diligence or other market intelligence including:

- From third party data providers and by analysing online and offline media (which we may do ourselves, or employ other organisations to do so for us);
- From delegate lists at relevant events; and/or
- From other limited sources and third parties (for example, from third party brokers and counterparties who may provide us with your details in accordance with any regulatory requirements).

3.3 *Personal information we collect automatically*

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please see Section 10.

4. How do we use your personal data and what is the legal basis?

Having obtained data about you, we then make sure we use it appropriately.

4.1 *Client data*

Investment Activities

If you are a client or prospective client we use the personal data you provide in the following ways:

- storing your details (and updating them when necessary) on our database in order that we can contact you in relation to our ongoing services, agreements or dealings with you, including relevant offerings;
- managing and administering your account (and this may require that we verify information you provide in the course of your onboarding as a client and to carry out credit checks or assessments about you or your directors, officers and employees);
- to carry out our obligations arising from our contracts with you;
- undertaking anti-money laundering and know your client checks in accordance with our legal and regulatory obligations;
- maintaining records of our conversations and meetings so that we can provide relevant services to you and in order to comply with our legal and regulatory obligations;
- for internal analysis and research in order to facilitate the provision of relevant services to you;
- in more unusual circumstances, to help us to establish, exercise or defend legal claims; and
- to comply with legal and/or regulatory requirements.

Relationship Management

- We may use your personal data to contact you to offer you additional services, keep you up to date with business development and market insights or to invite you to events that may be of interest (except where you have asked us not to).

- You have the right to opt out of receiving such communications from us by either liaising with your Jefferies contact or by electronically unsubscribing from emails we have sent you. After you unsubscribe we will not send you such communication emails but may continue to contact you to the extent necessary for the purposes of any services we are providing to you or as may be needed for regulatory purposes.

4.2 *Supplier data*

We will use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements or our dealings with you;
- To obtain support and services from you;
- To perform certain legal and regulatory obligations, such as carrying out anti-money laundering and verification/background checks;
- Facilitating our invoicing processes; and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

4.3 *Our legal basis for processing your personal data*

We will rely on one of the following legal basis:

- Necessary for performance of the contract or to take steps preparatory to such contract;
- Legal obligations for compliance with legal and regulatory obligations that we are subject to;
- Legitimate interests pursued by us or a third party to the extent such interests are not overridden by your interests or fundamental rights and freedoms; and
- To improve, enhance or develop our products and services in order to improve our business.

Alternatively, in certain limited circumstances we may be required to obtain your consent to the processing of your personal data in which case you will be asked to expressly consent.

5. **Who do we share your personal data with?**

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Affiliates within the Jefferies Group;
- Tax, audit, regulatory bodies or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, in connection with any anticipated litigation or in compliance with our legal and regulatory obligations);
- Third party service providers who perform functions on our behalf (including, without limitation, administrators, external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems, etc.);
- Third party outsourced IT and document storage providers (including cloud-based storage providers) where we have an appropriate processing agreement (or similar protections) in place; and
- If Jefferies (or a part of its business) is subject to a bid, or otherwise merges with or is acquired by another business or company in the future, we may share your personal data with the new (or prospective) owners of the business or company.

To ensure that your personal information receives an adequate level of protection, we put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects, the law and regulation on data protection.

6. **How do we safeguard your personal data?**

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to expeditiously deal with any suspected data breach (within 30

days from when we first become aware of the suspected data breach) and provide training for staff on handling personal data.

Please note you are responsible for ensuring that any personal data that you send to us is sent securely (e.g. encrypting attachments).

7. How long do we keep your personal data for?

We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. There may also be some legal, regulatory or risk-management requirements to retain data, including where certain data might be relevant to any potential litigation (bearing in mind relevant limitation periods).

Once we have determined that we no longer need to hold your personal data, we will undertake one or more of the following: delete it from our systems and destroy hard copies, archive the personal data so it is beyond use or anonymise/mask the relevant personal data.

8. How can you access, amend or take back personal data you have provided to us?

Subject to applicable law, you may have various rights in respect of the processing of your data, as listed below.

- *Access:* You may ask us to confirm, and provide copies of, the information we hold about you at any time, and request us to modify, update or delete such information.
- *Erasure:* You have the right to request that we erase your personal data in certain circumstances.
- *Restrict Processing:* You have the right to request that we restrict our processing of your personal data in certain circumstances.
- *Rectification:* You also have the right to request that we rectify any inaccurate or incomplete personal data that we process or control.
- *Data Portability:* If you wish, you have the right to transfer your personal data between data controllers. We may, at your request, transfer your relevant personal data to another organisation you so designate in a commonly used machine-readable format.
- *Object:* This right enables you to object to us processing your personal data where we do so for one of the following reasons: (i) our legitimate interests; or (ii) to send you relationship management materials for additional products or services.
- *Withdraw Consent:* Where we have obtained your consent to process your personal data for certain activities (for example, for certain relationship management arrangements or any automatic profiling), you may withdraw this consent at any time.

If we are unable to respond to an access request or correct your data within 30 days after receiving the request, we will inform you in writing within 30 days of the time by which we will be able to respond to the request or correct the data, as the case may be.

If you would like to exercise any of these rights, including withdrawing your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found in Section 11. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

In accordance with data protection laws you also have the right to lodge a complaint with your local supervisory authority for data protection, details of which can be found in Section 11 of this Notice.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

9. How do we store and transfer your data internationally?

In undertaking services for you, your personal data may be transferred to those set out in Section 5.

We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of Singapore where such transfer is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement that imposes a standard of protection that is at least comparable to that under the Personal Data Protection Act 2012 of Singapore ("PDPA"), and which specifies the countries and territories to which the data may be transferred under the contract;
- transferring your data to a country where there are binding corporate rules that require every recipient of the transferred data to provide a standard of protection for the transferred data that is at least comparable to that of the PDPA, and which specify (i) the recipients of the transferred data to which the binding corporate rules apply; (ii) the countries and territories to which the data may be transferred under the binding corporate rules; and (iii) the rights and obligations provided by the binding corporate rules; or
- where you have consented to the data transfer or other valid transfer basis.

10. Cookies

We may collect personal data through the use of cookies. A cookie is a small file containing data that is created and stored on your device when you visit a website using a computer or mobile device. When you visit a website, a cookie may be used to track the activities of your browser and provide you with a more consistent and efficient online experience. Tracking your use of our website using cookies enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

We use performance, functional, targeting, social media and strictly necessary cookies on our website. You can find out more about these cookies, including who provides these cookies and their purposes by reading our Cookies Policy. You can view and change your cookie preferences at any time by clicking on the cookie icon on the bottom left-hand side of the screen when you visit our website.

Although you can click the 'reject all' button on our website to opt out of most cookies, please note that our 'strictly necessary' cookies are necessary for the website to function and cannot be turned off in our systems. You can set your browser to block these cookies, but some parts of the site may not work if you do.

11. Contacting us in relation to your privacy and details of local supervisory authorities

If you would like further information about any of the matters in this Notice, have any questions about how we collect, store, or use your personal data, or would like to exercise any of the rights set out above, please contact our Singapore Data Protection Officer by email or post:

- APACPrivacy@jefferies.com
- Jefferies Singapore Limited, 10 Collyer Quay, #41 -01, Ocean Financial Centre, Singapore 049315

Details for the supervisory authority in Singapore:

Personal Data Protection Commission, 10 Pasir Panjang Road, #03-01 Mapletree Business City, Singapore 117438, Attn: Officer-in-charge, Consumer Services & Investigation.