

Personal Data Protection Notice

Dear Customer

Thank you for your support of Commerzbank AG Singapore Branch (the "Bank").

We would like to bring to your attention the Personal Data Protection Act of Singapore 2012 ("PDPA") which came into effect on 2 July 2014. The PDPA establishes a data protection law in Singapore that governs the collection, use and disclosure of personal data. We therefore wish to highlight to you what personal data we collect and the circumstances under which the Bank may use or disclose personal data submitted by your organisation to the Bank.

Information the Bank Collects and Uses

- (1) From time to time, the Bank may collect from (a) corporate customers, (b) third parties, including Relevant Individuals (as defined below) and/or (c) publicly available sources including credit bureaus the following information and data:
 - (i). personal data about the corporate customer's beneficial owners, partners, directors, officers or authorised signatories, call-back nominees, dealers, employees, customers, payors, payees, guarantors, other security providers and other natural persons related to the corporate customer (collectively all of the foregoing who are natural persons, "**Relevant Individuals**"). Such personal data may include names, identification particulars, date of birth, contact details and other relevant personal information;
 - (ii). information and data generated in the ordinary course of the banking relationship with the Bank, for example, when a Relevant Individual gives instructions, writes checks, transfers funds, deposits money, or arranges banking/credit facilities in connection with corporate customers. Such personal data may include signatures, answers to questions intended for security verification, emergency contact numbers or call back contact details;
 - (iii). information and data collected when a Relevant Individual participates in events organised by the Bank for its corporate customers, such as functions, seminars, or other similar events;
- (2) Personal data of a Relevant Individual may be processed, kept, transferred or disclosed in and to any country as the Bank considers appropriate, in accordance with the PDPA and in accordance with the local practices and laws, rules and regulations (including governmental acts and orders) in such country.

Deemed Consent

- (3) You will be deemed to have consented (or obtained the consent of the Relevant Individuals) to the collection, use and disclosure of the above mentioned personal data of Relevant Individuals by your continued dealing, use and/or acceptance of the Bank's banking services, products and facilities.

Purposes for which Information is Used and Disclosed

- (4) Information and data may be used and disclosed, including to places in or outside Singapore for the following purposes (collectively "**Permitted Purposes**"):

- (i). to make decisions relating to the opening or continuation of accounts and the establishment, provision or continuation of banking/credit facilities or banking/financial services for the corporate customer including banking, investments, products and services and otherwise maintaining accurate “know your customer” information;
- (ii). to fulfil and comply with foreign and domestic legal, regulatory and compliance requirements (including anti-money laundering, terrorist financing and tax obligations applicable to the Bank and disclosure to any stock exchange or banking regulator) and comply with any applicable treaty or agreement between foreign and domestic governments applicable to the Bank;
- (iii). to verify the identity or authority of representatives who contact the Bank or may be contacted by the Bank and to carry out or respond to requests, questions or instructions from verified representatives or other individuals pursuant to then current security procedures; and
- (iv). for marketing financial, banking, investment and related products or services to the corporate customer (and not the Relevant individuals) where specifically consented to or where permissible under the PDPA, and designing or refining any similar products or services.

Parties to whom Personal Data may be Disclosed

- (5) Personal data may be disclosed, where permitted by applicable law, to the entities (inside or outside Singapore) below (please note this is not an exhaustive list) for the Permitted Purposes or for processing in accordance with any Permitted Purposes on a need to know basis:
- (i). any agent, contractor, or third party service provider who provides banking, remittance, administrative, mailing, telecommunications, call centres, business process, travel, visa, knowledge management, human resource, data processing, information technology, computer, payment, debt collection, credit reference checks or securities clearing or other services to the Bank in connection with the operation of business of the Bank;
 - (ii). any person or entity which is part of the Bank and is under a duty of confidentiality to the disclosing the Bank entity, although only to the extent necessary to fulfil the relevant Permitted Purposes;
 - (iii). any person or entity to whom the Bank is under an obligation or otherwise required to make disclosure pursuant to legal process, or any other foreign or domestic legal and/or regulatory obligation, including disclosure to courts, tribunals, and/or legal, regulatory, tax and government authorities;
 - (iv). any actual or proposed assignee of the Bank or participant or sub-participant, investors, purchasers or transferee of the Bank’s rights in respect of the corporate customer, or all or any part of the assets or business of the Bank; and
 - (v). any party giving or proposing to give a guarantee or third party security to guarantee or secure the obligations of the corporate customer.

Inquiries

- (6) Any requests under the PDPA, including complaints and requests for information regarding policies and practices and kinds of data held are to be addressed to:

Personal Data Protection Officer

Commerzbank AG Singapore Branch, 128 Beach Road,

#17-01, Guoco Midtown, Singapore 189773

Email: DPOSingapore@commerzbank.com

- (7) Corporate customers may also direct their requests to their relationship manager.
- (8) Nothing in this notice shall affect our obligations under the Banking Act of Singapore and we will continue to observe the strict banking secrecy provisions under the Banking Act in respect of your accounts and transactions with us, subject to permitted disclosure exceptions under the Banking Act.

Yours Sincerely

Commerzbank AG, Singapore Branch