

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 of the Bank. Such personal data may include signatures, answers to questions intended for security verification, emergency contact numbers or call back contact details; and
 - (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:
- (i) represented and warranted to us that you have notified the Relevant Individual of:
 - a. the purposes for which data will be collected, processed, used or disclosed as described below; and
 - b. the Bank and the persons referred to in paragraph (7) below (the “Transferees”) as amongst the classes of person to whom his or her personal data may be transferred; and
 - (ii) consented (or obtained the consent of the Relevant Individuals) to the collection, processing, 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, in each case, in accordance with or for the purposes set out herein, and confirm that you are authorised by each such Relevant Individual to provide such consent on his/her behalf to the extent permitted by law.

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 or credit facilities or related products or services for the corporate customer of the Bank and otherwise maintaining accurate “know your customer” information;
 - (ii). conducting matching procedures, data processing operations, data storage services, customer due diligence, customer risk rating, transaction monitoring and any other processing relating to the provision of the accounts and financial services to a corporate customer of the Bank using personal data of such corporate customer’s Relevant Individuals;
 - (iii). 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;

- (iv). to verify the identity or authority of a corporate customer's 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;
- (v). for marketing financial, banking, investment and related products or services to the corporate customer of the Bank (and not the Relevant Individuals in their own personal capacity) where specifically consented to or where permissible under the PDPA, and designing or refining any similar products or services; and
- (vi). To any of the persons and for the purposes specified in paragraph 5(i) to (vi) below.

Parties to whom Personal Data may be Disclosed

- (5) Without prejudice to our rights to disclose at law and to the extent permitted by applicable law, personal data may be disclosed 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). within the Commerzbank Aktiengesellschaft branch network (including its head office) and to the Bank's affiliates and related corporations (collectively and together with the Bank, the "Bank Group"), each of whom may also further communicate any such information (including personal data) as it may consider useful or necessary to any other member of the Bank Group;
 - (ii). to any person to whom information is required to be disclosed in connection with, and for the purposes of, any litigation, arbitration, administrative or

- other investigations, proceedings or disputes involving or pertaining to corporate customers of the Bank;
- (iii). where the Bank considers it necessary in connection with the provision of services to corporate customers of the Bank, and on a confidential basis, to any broker, agent, custodian, market exchange, clearing house, trade repository, professional adviser, auditor, consultant, contractor, subcontractor or any other person providing services to the Bank or to a member of the Bank Group, whether under an outsourcing arrangement or otherwise;
 - (iv). to any person as and when the Bank is required to do so by applicable law and/or regulations, intergovernmental treaties and/or bilateral agreements with foreign authorities and where required or necessary to any nation or government, any state or political subdivision thereof or any entity, authority or agency exercising executive, judicial, regulatory, or administrative functions and their respective agents;
 - (v). to any of the Bank's actual or prospective assignees or transferees in respect of any of its rights and/or obligations towards corporate customers of the Bank; and/or
 - (vi). to any person who is a surety or who has given security for any of its customers' liabilities and obligations to the Bank.

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