

## **Privacy Notice**

### **1. Introduction**

This Privacy Notice applies to [www.abslamcsg.com](http://www.abslamcsg.com) (the "Website") and governs the collection, processing, disclosure and usage of personal data in compliance with the Personal Data Protection Act 2012 of Singapore ("PDPA") and the European Union General Data Protection Regulation ("EU GDPR"). By using the website, you consent to the collection, processing and usage of your data as set out in this document.

### **2. Collection, Processing, Disclosure and Usage of Data**

Aditya Birla Sun Life Asset Management Company Pte Ltd ("ABSLAMC") may collect data such as your name, contact numbers and email addresses ("Personal Information") for the purposes of delivering the services you have requested.

ABSLAMC will disclose your Personal Information without notice to the following parties under such circumstances:

- (i) to regulatory bodies in Singapore and other jurisdictions we operate in, if the data is required for the sake of complying with legal and regulatory requirements;
- (ii) to ABSLAMC employees and information technology service providers, to assist and collate the information required for the provision of the requested products and services;
- (iii) affiliates from other countries, if the standard of data protection provided is comparable to the protection under the PDPA and/or EU GDPR. In such case, ABSLAMC shall obtain a confirmation from the transferee or include a statement in the service level agreement with the transferee, regarding the data protection requirements applicable to the transferee.

### **3. Rights and Access**

To ensure the accuracy and completeness of your Personal Information, please let us know if there are changes to the data provided to ABSLAMC.

Subject to the conditions set out in the PDPA and EU GDPR, you have the right to access information about the ways in which your Personal Information has been or may have been used, collected or disclosed. Upon request, a copy of the Personal Information will be provided to you in electronic format, free of charge.

Pursuant to article 17 of the GDPR, the EU individual concerned shall have the right to request ABSLAMC to erase the personal data concerning him or her without delay, when the personal data are no longer necessary for the purposes for which it is collected and/or when the client withdraws its consent.

You also have the right to withdraw your consent for the collection, processing and disclosure of your Personal Information at any point in time.

### **4. Security**

In line with ABSLAMC's Record Keeping Policy, all documents, records and data pertaining to clients will be kept for a period of five (5) years. ABSLAMC shall cease to retain such documents, records and data, or remove the means by which the Personal Information can be associated with particular individuals when it is no longer necessary for any business or legal purpose.

For avoidance of doubt, ABSLAMC may be required to keep the records beyond the 5 year record keeping requirement if there are pending or ongoing legal or regulatory investigations.

In order to protect the privacy and prevent unauthorised access of personal data of our individual clients, ABSLAMC has placed stringent security arrangements to protect the Personal Information we possess and control in accordance with PDPA and GDPR requirements.

### **5. Changes to Privacy Notice**

This privacy notice may be updated from time to time without prior notice to you. Please review this notice periodically to ensure you are aware of how ABSLAMC collects, process, disclose and uses the information you provided.