



## PRIVACY STATEMENT – SINGAPORE PERSONAL DATA PROTECTION ACT

This document ("**Privacy Statement**") describes how the ICAP Group of Companies (as defined below) collects, uses, handles and discloses personal data and information which is subject to the Singapore Personal Data Protection Act ("**the Act**"). It also describes the matters to which you give your consent when obtaining financial services from the ICAP Group of Companies.

By interacting with us, submitting information to us, or using any products or services offered by us, you agree and consent to the ICAP Group of Companies (including but not limited to *ICAP AP (Singapore) Pte Ltd, ICAP Financial Products Pte Ltd, ICAP Energy Limited (Singapore Branch)* and their Affiliates (the term "**Affiliate**" shall mean, in respect of any party, persons who control, are controlled by or are under common control with such party) (collectively, the "**ICAP Group of Companies**"), as well as their respective representatives and/or agents ("**Representatives**") (collectively referred to herein as "**ICAP**", "**us**", "**we**" or "**our**") collecting, using, disclosing and sharing amongst themselves your personal information and disclosing such personal information to the Companies' authorised service providers and relevant third parties.

### Collection and use of your personal information

Generally we collect personal information from you when you interact with our employees eg via telephone calls, letters, meetings and emails, when you use our services or when you submit personal information to us for any other reason.

The personal information collected about you by ICAP is collected primarily for the purpose of providing services, dealing in financial products and ongoing account administration. In addition, your personal information is collected for some secondary purposes including:

- a) sending out other materials to you (including marketing other ICAP Group of Companies products to you);
- b) activities relating to the processing of your application to open an account with ICAP and the maintaining of your account, including to new or existing client verification;
- c) maintenance and verification of particulars and data;
- d) providing services to you including monitoring and analysing the conduct of your account, assessing any credit limit or other credit decision and enabling us to carry out statistical and other analysis and otherwise market services and products to you; and
- e) any purpose relating to or in connection with compliance with any law, regulation, court order or request of a regulatory body.

### Disclosure of your personal information

We may disclose personal information collected about you in the following circumstances:

- a) to third parties to whom we contract out specialised functions pertaining to the primary or secondary purposes set out in this Privacy Statement. These third parties may not be in Singapore, and may require the transfer of your personal information to someone who is in a foreign country. If we do disclose personal information to third party contractors under outsourcing or contracting arrangements, we take reasonable steps to ensure that those third parties:
  - (i) comply with the Act when they handle your personal information; and
  - (ii) are authorised only to use personal information in order to provide the services or to perform the functions required by us;
- b) to our lawyers and auditors to the extent that disclosure relates to the activities described above;
- c) in compliance with any law (eg under court orders or under laws relating to sanctions or anti-money laundering);

- d) if required or authorised to do so, to regulatory bodies and government agencies; and
- e) to any person reasonably necessary for the purposes of that person taking an assignment of any contract that we have with you.

If we have used an example to indicate when we might exchange personal information, the exchange of personal information may not be limited to those example or examples of a similar kind.

### **Electronic Communications**

If you provide us with an e-mail address for correspondence or liaise and correspond with us on other electronic messaging services, you consent to electronic communications being sent to you via that e-mail address or through those messaging service details, including notices and reminders. You also consent to the monitoring and review of those electronic communications.

### **Voice and Telephone Communications**

Telephone conversations which we may have with you (or any third party) may be recorded and you consent to the recording, monitoring and review of telephone conversations.

### **Enquiries**

Enquiries concerning the personal information provided by you to ICAP, including withdrawal of consent, or the request for access and corrections, should be addressed to:

*Data Privacy Officer*

10 Marina Boulevard #21-01

Marina Bay Financial Centre Tower 2

Singapore 018983

Tel: +65 6831 0888

Email: [apaclegal@icap.com.sg](mailto:apaclegal@icap.com.sg)