

Singapore Personal Data Protection Act (PDPA) Notice

Bank of America Merrill Lynch entities in Singapore (BofAML Singapore), including Bank of America, National Association - Singapore Branch, Merrill Lynch (Singapore) Pte Ltd, Merrill Lynch Markets Singapore Pte Ltd and Bank of America Singapore Ltd, recognise the importance of protecting personal data in compliance with applicable legal and regulatory requirements. BofAML Singapore is bound by the Personal Data Protection Act 2012 (PDPA).

BofAML Singapore provides this PDPA Notice to clients so they can ensure that individuals connected with the client (such as client representatives, employees, officers, directors, shareholders, and other related individuals) are notified about the handling of personal data by BofAML Singapore. Where clients provide BofAML Singapore with personal data of individuals, the client is deemed to have notified the relevant individuals and obtained their consent to the collection, use and disclosure of personal data in accordance with this document and any other applicable laws and regulations, to have granted BofAML Singapore consent for such collection, use and disclosure of personal data on behalf of the relevant individuals, and to be able to provide verification of consent to BofAML Singapore if requested. If the necessary personal data is not collected, BofAML Singapore may not be able to provide clients with certain products and services.

This PDPA Notice includes information about:

1. What and how personal data is collected
2. Why personal data is collected
3. Security and limited disclosure of personal data
4. Contact details for BofAML Singapore

BofAML Singapore may provide other material regarding the collection, use and disclosure of personal data in account documents or on websites. If there is any conflict between this document and the account documents, the terms of the specific account documents will prevail.

1. What and how personal data is collected

BofAML Singapore collects, uses and discloses personal data about individuals to the extent appropriate for the relationship with each client. Personal data may include name, signature, address, telephone number, email address, date of birth, personal identifiers such as passport number, NRIC number, driver licence, and other personally identifiable information.

Due to the nature of BofAML Singapore's business, it is impracticable in most circumstances to collect personal data directly from individuals. Usually, personal data of individuals is collected indirectly through clients. Personal data about individuals may also be collected from other sources, including public sources.

2. Why personal data is collected

BofAML Singapore collects, uses and discloses personal data for a range of purposes, which may include but is not limited to:

- to provide clients with products and services
- to facilitate transactions
- to provide advice and guidance
- to respond to client requests
- to detect, prevent and investigate fraud
- to verify identity
- to perform risk management
- to comply with applicable laws, rules and regulations including anti-terrorism, anti-money laundering, anti-bribery, anti-corruption and tax reporting rules and regulations
- to comply with legal process, to respond to requests from public, regulatory or government authorities (including authorities outside Singapore), and to allow us to pursue remedies and limit damages
- to perform internal business processes such as data analysis, audits, and developing and improving new products and services
- as part of the sale, merger or similar change of a Bank of America Corporation business

When individuals communicate with BofAML Singapore, to the extent permitted or required by applicable law, telephone conversations and electronic communications, including

emails, text messages and instant messages, may be recorded and/or monitored for evidentiary, compliance, quality assurance and governance purposes.

3. Security and limited disclosure of personal data

Personal data held or controlled by BofAML Singapore is treated as confidential information. However, due to the global nature of the Bank of America Merrill Lynch group, personal data may be shared with affiliates, related corporations, service providers or other third parties located in Singapore and around the world for all of the purposes described in this PDPA Notice to the extent appropriate for the relationship with each client.

BofAML Singapore, affiliates and related corporations maintain physical, technical, electronic, procedural and organisational safeguards and security measures to protect personal data against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed in Singapore or elsewhere. Appropriate employees are authorised to access personal data for legitimate and specified business purposes. All employees are bound by a code of ethics and other internal policies that require confidential treatment of personal data and are subject to disciplinary action if they fail to follow such requirements.

Service providers are required to appropriately protect personal data. Service providers may include: customer service, payment or transaction processing companies; printing companies; professional services organisations (such as legal, audit, accounting services, technology, and data processing companies); technology hosting (such as webhosting, cloud computing, infrastructure provision, application service providers, data centre services and technology service providers).

Other third parties may include: public, regulatory and government authorities, intermediaries, other nonaffiliated third parties as requested by clients or authorised representatives, self-regulatory organisations, or judicial or law enforcement authorities.

4. Contact details

To request access to and correction of personal data, or to make any enquiries regarding personal data, please contact BofAML Singapore's Data Protection Officer at privacysingapore@baml.com.