

Client Data Privacy Notice

BOS WEALTH MANAGEMENT EUROPE S.A. – UK BRANCH

62 Queen Street
London EC4R 1EB, United Kingdom

CLIENT DATA PRIVACY NOTICE

PRELIMINARY PROVISIONS

BOS Wealth Management Europe S.A. and its United Kingdom (the “UK”) Branch (“BOSWME”) are committed to protecting your privacy and ensuring the highest level of security for your personal data. This notice (the “Data Privacy Notice”) explains the types of personal data we collect, how we use that data, who we share it with, and how we protect that data. It also provides you with information with respect to your rights.

The information set out in this Data Privacy Notice will continue to apply even after the termination of your agreement with us for the provision of our services or products.

Please read the following carefully to understand our views and practices with respect to personal data.

Wherever we use ‘you’, ‘you’ or the “Client”, this means you or any person connected to you namely any authorised person, anyone who deals with us for you (e.g., trustees or executors, attorneys, external asset managers) and other related people (including but not limited to authorised signatories, partners, members, directors, beneficial owners of companies, beneficiaries of trusts).

Wherever we use said ‘we’ or ‘our’, this means BOSWME which acts as **data controller** in respect of your personal data. Unless otherwise stated below, the data controller for the purposes of this Data Privacy Notice will be BOSWME.

By submitting your personal data to us, you acknowledge that you have read and understood this Data Privacy Notice and agree to the use of your personal data as set out herein.

1. What data is covered by this Data Privacy Notice?

This Data Privacy Notice applies to personal data processed by BOSWME which means data that (either in isolation or in combination with other data) enables you to be identified directly or indirectly.

2. What personal data do we collect from you and how?

“Personal data” means any information relating to you as a data subject. As part of your business relationship with BOSWME we will collect your personal data directly from you and/or from public sources or authorised third parties (e.g., public authorities, trustees or executors, corporate and media sources) before and during your onboarding process, in the course our business relationship, and after the termination of our agreement if needed. As part of this, BOSWME will collect, process, and use the categories and types* of personal data (the “Processing Purposes”) about you as follows:

IDENTIFICATION DATA	PERSONAL INFORMATION	CONTACT DETAILS
<ul style="list-style-type: none">namegenderfinancial and bank detailsnationality and citizenshippassport or other identification details	<ul style="list-style-type: none">genderdate and place of birth	<ul style="list-style-type: none">home addresswork addresspersonal emailwork emailpersonal telephone numberwork telephone number
YOUR WORK & EDUCATIONAL EXPERIENCE	YOUR INCOME AND BENEFITS	YOUR EQUITY COMPENSATION
<ul style="list-style-type: none">work experience details (e.g., employment or retirement data)	<ul style="list-style-type: none">salarybonus	<ul style="list-style-type: none">units of stock or directorships held, details of all restricted stock units or any other entitlement to shares of stock

<ul style="list-style-type: none"> education details 	<ul style="list-style-type: none"> commission entitlements, raise amounts and percentages pension plans tax number 	<ul style="list-style-type: none"> awarded, cancelled, exercised, vested, unvested or outstanding in your favour
BUILDINGS ACCESS MONITORING INFORMATION	COMMUNICATIONS & SOCIAL MEDIA	STAFF INTERACTION AND COMBINED DATA
<ul style="list-style-type: none"> CCTV images swipe card access details of visits to our premises 	<ul style="list-style-type: none"> emails, letters, and faxes face-to-face meetings chat data and instant messages telephone calls (which may be recorded by BOSWME) corporate and media broadcasts public disputes/litigation data correspondence between legal advisers and stakeholders transcripts or minutes decisions of shareholders or directors posts on social media; such data is collected from publicly available social media only 	<ul style="list-style-type: none"> personal data from you when you interact with our staff, including customer service officers, relationship managers, other representatives combined data from third parties data pertaining to social interactions between individuals, organisations, prospects and other stakeholders acquired from companies that collect combined data and data from fraud avoidance systems

*The personal data types mentioned above are for example purposes only and the list is not exhaustive.

In addition to the collection, processing, and use of the Employee Data, BOSWME collects, processes, and uses the following special categories of personal data about you which are described as “**sensitive data**”.

CRIMINAL RECORD DATA	PERSONAL INFORMATION
<ul style="list-style-type: none"> criminal record background checks in relation to you 	<ul style="list-style-type: none"> information contained in your marriage/civil partnership certificate holding of public office or political/non-governmental organisations' affiliations

3. Why does BOSWME need to collect, process, and use my personal data and what is the legal basis for doing so?

PROCESSING PURPOSE	LEGAL BASES
(i) To execute our agreement and manage the customer file we conduct the required customer due diligence when you enter into a business relationship with us, to facilitate other entities establishment and our vendor due diligence process.	<ul style="list-style-type: none"> Necessary for performing a contract with you as the data subject Legitimate interests of BOSWME Compliance with legal obligations which BOSWME is subject to in relation to employment law and tax law
(ii) To enable us to process your transactions.	<ul style="list-style-type: none"> Necessary for performing a contract with you as the data subject

(iii) Crime prevention, detection and prosecution, security health and safety.	<ul style="list-style-type: none"> ▪ Necessary for performing a contract with you as the data subject ▪ Legitimate interests of BOSWME ▪ Compliance with legal obligations which BOSWME is subject to in relation to employment law and tax law
(iv) Monitoring of regulated activities, training, and development.	<ul style="list-style-type: none"> ▪ Legitimate interests of BOSWME ▪ Compliance with legal obligations which BOSWME is subject to in relation to employment law and tax law
(v) To facilitate fraud case handling and reporting.	<ul style="list-style-type: none"> ▪ Necessary for performing a contract with you as the data subject ▪ Legitimate interests of BOSWME ▪ Compliance with legal obligations which BOSWME is subject to in relation to employment law and tax law
(vi) To facilitate complaints handling and reporting.	<ul style="list-style-type: none"> ▪ Necessary for performing a contract with you as the data subject ▪ Compliance with legal obligations which BOSWME is subject to in relation to employment law and tax law
(vii) Direct marketing.	<ul style="list-style-type: none"> ▪ Legitimate interests of BOSWME

4. Do we use your personal data for direct marketing?

We may send you marketing messages by email and/or contact you by telephone to provide you with information about our products and services. You have the right at any time to object to the use of your personal data for marketing purposes by contacting us using the contact details set out in the below Chapter 11 "How can you contact us?".

5. With which third parties do we share your personal data?

Your personal data is intended for BOSWME but may be shared with third parties in certain circumstances:

To companies pertaining to the same group: In order to optimise the quality and efficiency of its services for its clients, BOSWME relies on the resources, skills and operational support of its branch established in the United Kingdom. For the same purposes, BOSWME also relies on the branch of OCBC Bank established in the United Kingdom (the "**OCBC Branch**"), its ultimate parent company OCBC Bank (established in Singapore) as well as its parent company, Bank of Singapore Limited (established in Singapore), their subsidiaries, branches, representative offices, and other entities belonging to the OCBC and Bank of Singapore (together, the "**Recipients**").

We may share your personal data to the Recipients in order to administer our services and products, provide you with customer support, process your instructions, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this Data Privacy Notice.

Additionally, we may share your personal data with the Recipient where we have a legitimate reason for doing so e.g., to manage risk, to verify your identity, or to assess your suitability for products and services.

Our service providers: We use other companies, agents, or contractors to perform services on our behalf or to assist us with the provision of our services and products to you. We may share personal data with the following categories of service provider:

- a. infrastructure and IT service providers, including for email archiving.
- b. marketing, advertising, and communications agencies.
- c. credit reference agencies.
- d. external auditors and advisers.

- e. offsite archival storage providers

In the course of providing such services, these service providers may have access to your personal data. However, it is our policy to limit the categories of individuals who have access to the personal data based on a 'need-to-know' principle to the extent necessary to perform their tasks. Furthermore, we will only provide our service providers with personal data which is necessary for them to perform their services, and we obligate them not to use your information for any other purpose. We will seek to ensure on a 'best efforts' basis that all our service providers keep your personal data secure.

Third parties permitted by law: In certain circumstances, we may be required to disclose or share your personal data in order to comply with a legal or regulatory obligation (i.e., we may be required to disclose personal data to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your personal data to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

Third parties connected with business transfers: We may transfer your personal data to third parties in connection with a reorganisation, restructuring, merger, acquisition, or transfer of assets, provided that the receiving party agrees to treat your personal data in a manner consistent with this Privacy Notice.

We will not sell in any circumstances your personal data to third parties.

Please note our website may, from time to time, contain links to and from the websites of our partners or affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we have no control over how they may use your personal data. You should check the privacy policies of third-party websites before you submit any personal data to them.

6. Do we transfer personal data outside the European Economic Area and the UK?

Your personal data might be transferred to, and stored at, a destination outside the European Economic Area (the "EEA") and the UK including to locations which may not have the same level of protection for personal data as in the EEA and UK.

For the purposes mentioned in the above Chapter 5 "*With which third parties do we share your personal data?*", personal data may be transferred to Recipients located in Singapore, Hong Kong and their offices located in Philippines and Dubai. Despite the existence of comprehensive data protection laws in Singapore and Hong Kong, those countries are not part of the limited list of countries offering an adequate level of protection for personal data set out by the European Commission and the UK Secretary of State. For this reason, BOSWME, acting as data controller, has taken all reasonable steps necessary to ensure that your personal data is treated securely and in accordance with this Data Privacy Notice as well as applicable data protection laws, including, where relevant, by entering into EU and the UK standard contractual clauses (or equivalent measures) with the party outside the EEA and the UK (available here:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)

The Recipients will also monitor the compliance by their sub-contractors with the terms of those contractual arrangements. BOSWME may also transfer Personal Data to third parties such as governmental or regulatory agencies in or outside the European Union and the UK, in accordance with applicable laws and regulations.

7. What are your rights?

If you are in the EEA or the UK, you have the following rights (if applicable):

- a. **Access.** You have the right to request a copy of the personal data we are processing about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.
- b. **Rectification.** You have the right to have incomplete or inaccurate personal data that we process about you rectified.
- c. **Deletion.** You have the right to request that we delete personal data that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.
- d. **Restriction.** You have the right to restrict our processing of your personal data where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.

- e. Portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.
- f. Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise, or defence of a legal claim.
- g. Withdrawing Consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

To exercise any of these rights, please contact us as stated in the below Chapter 11 "Who can I contact if I have questions?".

You also have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in, or the issue relates to the United Kingdom, the Information Commissioners Office can be contacted as follows:

Telephone: 0303 123 1113 - opening hours Monday to Friday between 9am and 5pm (excluding bank holidays)

Chat: (via following link) <https://ico.org.uk/global/contact-us/contact-us-public/public-advice/>

Website: <https://ico.org.uk/>

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

8. How do we protect your personal data?

We have implemented technical and organisational security measures to safeguard the personal data in our custody and control. Such measures include, for example, limiting access to personal data only to employees and authorised service providers who need to know such information for the purposes described in this Data Privacy Notice as per our 'control access policy'; adopting security protocols on networks and systems; using email security settings when sending and/or receiving highly confidential emails; applying physical access controls such as marking confidential documents clearly and prominently, storing confidential documents in locked file cabinets; restricting access to confidential documents on a need-to-know basis; using privacy filters; disposal of confidential documents that are no longer needed, through shredding or similar means; using a mode of delivery or transmission of personal data that affords the appropriate level of security (e.g., registered post instead of normal post where appropriate); confirming the intended recipient of personal data as well as other administrative, technical and physical safeguards.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification, and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

9. How long do we keep your personal data?

We will only retain your personal data for as long as necessary for the purpose for which that data was collected and to the extent permitted by applicable laws. When we no longer need to use personal data, we will remove it from our systems and records and/or take steps to anonymise it so that you can no longer be identified from it.

10. How do we deal with children's privacy?

We will never knowingly collect personal data from individuals under the age of sixteen (16) years without first obtaining verifiable parental consent. If you are under the age of 16 you should not provide information to us. If we become aware that a person under the age of sixteen (16) years has provided personal data to us without verifiable parental consent, we will remove such personal data from our files.

11. How can you contact us?

If there are any questions or concerns regarding this Data Privacy Notice, please contact us as follows:

Data Protection Officer, by email to dpo@boswm.com or by letter to BOS Wealth Management Europe S.A., UK Branch at The Rex Building, 3rd Floor, 62 Queen Street, London EC4R 1EB

12. Which version of this Data Privacy Notice applies?

This Data Privacy Notice is written in English and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this notice, the English version shall prevail.

We reserve the right to change our Data Privacy Notice from time to time. If we decide to change our Data Privacy Notice, we will notify you of these changes.