



## **STEP Portal Privacy Notice**

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## Privacy Notice

### **Our Commitment to Your Privacy**

We, STEP Wealth Management Pte. Ltd. are sensitive to the privacy concerns of the users (“you”) of this STEP by Azalea portal (“STEP Portal”). We have a long-standing policy of protecting the confidentiality and security of information we collect about you in accordance with the Personal Data Protection Act 2012 of Singapore (“PDPA”). We are providing you with this notice (“Privacy Notice”) to help you better understand why and how we collect and use certain Personal Data (defined below), the care with which we treat that Personal Data, and how we use that Personal Data.

“Personal Data” means any data about an individual who can be identified from that data, as more specifically defined under the PDPA and other applicable data protection laws.

### **Sources of Non-Public Personal Data**

In connection with the operation and provision of the STEP Portal and the products and/or services available on the STEP Portal (collectively, “Products and Services” and each a “Product” or “Service”, as the case may be), we may collect and maintain non-public Personal Data from various sources, including:

- Information we receive from you in conversations over the telephone, in voicemails, through written correspondence, via e-mail and other electronic communications, or on subscription agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification and verification documentation);
- Information about your transactions with us and/or the relevant manager of a Product; and
- Information disclosed, captured or otherwise associated with the use of our website and/or the STEP Portal (as applicable) including registration information, information provided through online forms and any information captured via “cookies”.

### **Collection, Use, Disclosure and Processing of Personal Data**

We may collect, use, disclose or otherwise process your Personal Data for various purposes relating to the operation and provision of the STEP Portal and the Products, including:

- (i) to provide our Products and services as subscribed to or requested by you;
- (ii) to process and carry out any instructions or transactions you make on the STEP Portal;
- (iii) to fulfil client due diligence requirements in relation to any Product you are currently subscribed to, or may in the future subscribe to;
- (iv) to market, promote or solicit any Product on the STEP Portal to you;
- (v) to process, administer, manage and/or maintain your account on the STEP Portal, including any purpose ancillary thereto;
- (vi) to deliver to you any administrative notices, updates, notifications, alerts and communications relevant to your use of the STEP Portal;

- (vii) to conduct research, analysis and development activities (including but not limited to data analytics, surveys and/or profiling) to improve the STEP Portal and any services you may have requested;
- (viii) to store, host or back up (whether for disaster recovery or otherwise) your Personal Data, whether within or outside Singapore;
- (ix) to respond to any legal processes, pursue legal rights and remedies, and manage any complaints, claims, feedback and fault reporting;
- (x) to respond to requests for information from public and governmental/regulatory authorities, statutory boards, related companies and for audit, compliance, investigation and inspection purposes;
- (xi) to comply with any applicable law, regulation, codes of practice, guidelines, or rules, or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority, whether within or outside Singapore; and/or
- (xii) to achieve any other incidental business purposes related to or in connection with the above-listed purposes.

In connection with the purposes listed above and any other purposes required and/or permitted by law or regulation, we may disclose your Personal Data to (i) any entity of the Azalea Group<sup>1</sup> including an entity managed by it, (ii) any other manager of a Product on the STEP Portal, and (iii) in relation to the persons in (i) and (ii), their respective affiliates, directors, officers, consultants, advisors, employees, service providers, banks or agents (including but not limited to, administrators, auditors, governmental agencies).

**Right to Withdraw Consent and Request Access to, and Correction of Personal Data**

You may withdraw your consent for us to use your Personal Data for one or more of the foregoing purposes by writing to us using the contact details below.

Upon receipt of your written request to withdraw your consent, we may require a reasonable period of time to process and respond to your request. However, please note that (i) your failure to supply certain Personal Data to us, or (ii) your request to withdraw your consent (depending on its nature and scope) may result in us being unable to continue providing you with access to the STEP Portal and/or our Products.

You may request to access and/or correct the Personal Data currently in our possession by writing to us using the contact details provided below. Please note that we may charge you a reasonable fee for the handling and processing of your requests to access your Personal Data. If so, we will inform you of the applicable fee and obtain your consent before processing your access request. We will respond to your request as soon as reasonably possible.

**Retention of Personal Data of Current and Former Users**

We retain non-public Personal Data of our former users and apply the same policies that apply to current users, that is, for as long as such retention is necessary for our legal or business purposes.

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<sup>1</sup> "Azalea Group" refers to Azalea Asset Management Pte. Ltd. and its subsidiaries.

### **Information Security**

We consider the protection of Personal Data to be a sound business practice, and to that end we employ physical, electronic and procedural safeguards, which seek to protect your non-public Personal Data in our possession or under our control.

You should be aware, however, that no method of data storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your personal data, and regularly review and enhance our security measures.

## **Cookie Policy**

### **What is a cookie?**

Cookies are small files which are placed on your computer when you access a website or app – amongst other things; they help the website user to navigate efficiently between pages and the website operator to track usage of the site.

You can find out more about cookies at [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Why we use cookies?**

We use cookies and other electronic tools to collect statistical information about your use of this STEP Portal. We use the information to compile reports and to help us improve the STEP Portal. We use cookies to distinguish you from other users of the STEP Portal by storing, generally non-personally identifiable, information. For example, session information such as the number of times you visit our website and the location from which you are accessing the website. We also collect information on the number of visitors to the STEP Portal in an aggregated and anonymous form, as well as the types of devices the visitors use. Kindly note that some limited information is personally identifiable for the purposes of managing and customizing your experience on the STEP Portal, as well as analysing trends.

We may also use such information for our own purposes, including research and analysis, to enhance your experience on this STEP Portal, to provide you with certain functions on this Portal, and to create, aggregate and anonymize information about usage of this STEP Portal, etc.

### **What are my options in relation to the use of cookies?**

By using the STEP Portal, you agree to the use of cookies and other technologies as set out in this Privacy Notice. If you do not agree to such use, please either refrain from using the STEP Portal, or see the section below “Can you disable cookies?” to adjust your settings.

You can find more information about the individual cookies we use and the reasons why we use them in the table below.

Cookie	Name	Default expiration time	Purpose	More information
Google Analytics	_ga	2 years	Used to distinguish users.	The cookie is a "third party" cookie. Click <a href="#">here</a> for an overview of privacy and cookie practices at Google.  You can find further information about the individual cookies we use at <a href="#">here</a> .
	_gid	24 hours	Used to distinguish users.	
	_ga <container-id>	2 years	Used to persist session state.	

**Can you disable cookies?**

Yes, your browser will enable you to disable, control or delete cookies if you wish. Further information can be found in the "Help" section of your browser or at [www.allaboutcookies.org](http://www.allaboutcookies.org).

However, if you have deleted and disabled cookies, certain features may not be possible to the extent they are based on cookie information. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. Kindly note that if you disable cookies or refuse to accept a request to place a cookie, it is possible that some parts of the STEP Portal will not function properly.

To opt out of being tracked by Google Analytics please visit <http://tools.google.com/dlpage/gaoptout>.

**Links to Third-Party Websites**

The STEP Portal may contain links to and from the websites of our affiliates, advertisers, or other third parties. When you access the websites of such affiliate, advertiser or third party, your Personal Data may be collected directly by the operators of such websites. Since we do not control such websites, we do not accept any responsibility or liability for such websites, and for any information you may provide while on such websites. Your access and provision of Personal Data to such websites are entirely at your own risk. We encourage you to read the privacy policies on those websites before providing any of your information on such websites.

**Further Information**

We reserve the right to update and/or change our privacy policies and this Privacy Notice at any time. We will use commercially reasonable methods to notify you of such revisions, such as by posting a revised version on the STEP Portal. Such updated or revised Privacy Notice shall be effective upon publication on the STEP Portal and you are responsible for ensuring that you have read the most current version of this Privacy Notice. Your continued access and/or use of the STEP Portal thereafter will be deemed to constitute your conclusive acceptance of the updated or revised policies. Any examples contained within this notice are illustrations only and are not intended to be exhaustive.

**Contact Us**

*Getting in Touch:* If you have additional questions regarding this Privacy Notice, please contact us at [compliance@azalea.com.sg](mailto:compliance@azalea.com.sg)