

Personal Data Protection Act (PDPA), General Data Protection Regulation (GDPR), Data Protection Act (DPA)

Data protection information for natural persons



This data protection booklet is intended to provide you with an overview of the processing of personal data held by VP Bank Ltd Singapore Branch ("**Bank**"), which is carried out in accordance with applicable law, being Singapore's Personal Data Protection Act 2012 ("**PDPA**") and (as applicable, for certain individuals domiciled/resident in the EU/EEA or Switzerland) the General Data Protection Regulation ("**GDPR**") and the Federal Act on Data Protection (the "**Swiss Data Protection Act**"). Sections 1 to 4 of this booklet describe the collection, processing and use of personal data by the Bank in accordance with the PDPA, whereas the Appendix to this booklet describes additional points applicable for relevant individuals under the GDPR and the Swiss Data Protection Act.

The specific personal data that are processed and the ways in which such data is used are essentially dependent on the services and products agreed and/or to be provided in each individual case. Besides client confidentiality obligations under the Singapore Banking Act 1970, the Bank is obliged under applicable personal data law and regulation to protect the privacy and to maintain the confidentiality of your personal data in accordance with such law and regulation. For this reason, the Bank has taken an array of technical and organisational data protection measures relating to any and all processing of your personal data.

In the context of our business relationship with you, we process such personal data as are required to open and conduct the business relationship, to fulfil the associated statutory or contractual obligations and to provide services or execute orders. Without such data we will generally be unable to enter into or maintain a business relationship, to carry out orders or to offer our products and services.

If you have questions regarding the processing of specific data or your rights in this regard, please contact:

Responsible organisation:

VP Bank Ltd Singapore Branch
128 Beach Rd,
#13-01 Guoco Midtown,
Singapore 189773,
Singapore.

Data protection officer contact details:

VP Bank Ltd Singapore Branch
128 Beach Road,
#13-01 Guoco Midtown,
Singapore 189773,
Singapore.

dataprotection.sg@vpbank.com

1. Which data (categories) are processed and where do they originate from (data provenance)?

We collect and process personal data that we receive in the course of our business relationships or in the business initiation phase with our interested parties, with clients and with business partners¹. Personal data may be processed at every stage of the business relationship and will vary according to the group of persons involved.

As a general rule we process personal data that are made available to us by means of contracts and forms submitted by you, in correspondence with us or in other documents. To the extent necessary in order to provide our services, we also process personal data which you provide whenever you take up certain products or services or which we have lawfully obtained from third parties (e.g. from a credit agency), public bodies (e.g. including entities such as the MAS, the UN and the Council of the European Union that publishes lists of sanctioned persons) or other VP Bank Group ("**Group**") companies.

Finally, the personal data we process may include data from sources in the public domain (e.g. debt directories, land registers, trade and industry associations, the press, the Internet). In addition to client data we will, wherever necessary, process personal data relating to other parties involved in the business relationship, such as authorised agents, representatives, directors and shareholders of the parties or of other entities underlying to such parties' directors and shareholders, partners, trustees and protectors and settlors and beneficiaries of any underlying trusts, founders and council members of any underlying foundations, co-obligors in credit arrangements, guarantors and sureties, legal successors or the beneficial owners of a business relationship. Please be so kind as to share this data protection information with all such involved parties.

"**Personal data**" is defined under the PDPA as any data, whether true or not, about an individual who can be identified from that data, or from that data and other information to which the organisation has or is likely to have access. Accordingly, "personal data" may refer to the following data categories (set out on a non-exhaustive basis):

- personal particulars (e.g. name, date of birth, nationality);
- address and contact details (e.g. residential address, telephone number, e-mail address);
- user identification data (e.g. passport or ID card data) and authentication data (e.g. sample signature);
- information on products and services used and order and risk management data (e.g. payment information, investment experience and investment profile, payment

¹ The term "business partner" refers to intermediaries, external service providers and suppliers, etc.

transaction turnover data, information on compliance with due diligence requirements and anti-money laundering rules, criminal record information);

- other client account data and information on the business relationship (e.g. account, contract and portfolio numbers, contract duration, information on spouses/partners and other family details, information on authorised agents or legal representatives);
- information on your financial circumstances and your personal and professional background (e.g. data on your creditworthiness, tax situation and asset provenance as well as information on your requirements, interests, wishes and preferences);
- technical data and information generated by contacts with you (e.g. minutes of advisory conversations) and by your electronic correspondence with the Bank (e.g. logs of system access, changes to settings, website visits);
- audio-visual data (e.g. video or telephone recordings);
- data in the public domain (e.g. debt directories, land registers, trade and industry associations, the Internet).

2. For what purposes and on what legal bases are your data collected, used, processed and / or disclosed?

We collect, use and/or process personal data in accordance with applicable law for the following purposes:

- **for the performance of a contract or in order to take steps prior to entering into a contract.** The exact purposes of the data processing will largely depend on the specific product or service involved (e.g. account, loan, securities, deposits, brokerage). Your data may be processed among other things to help analyse your service and/or advisory requirements, for asset or relationship management purposes or as part of transaction execution. More information regarding the purposes for which personal data will be processed in relation to your transaction/service/contract will be provided to you as appropriate.
- **to fulfil obligations under law or regulation or pursuant to directions from supervisory authorities of the Bank or in the Group,** in particular but not limited to ensuring proper compliance with statutory and regulatory requirements (e.g. compliance with applicable statutes and regulatory notices governing the prevention of money laundering and market abuses, tax legislation and treaties, monitoring and reporting duties and risk management standards).
- **to safeguard the legitimate interests of the Bank or third parties** such as (without limitation) the assessment of creditworthiness, the posting and realisation of collateral guarantees, the pursuit of claims, product development, marketing and promotion business analysis and risk control, compiling and analysing data for statistics and planning, the prevention, detection and

investigation of criminal acts (including fraud), video surveillance to uphold Bank regulations and avert threats, telephone recordings, managing Bank infrastructure and business operations (including IT system security and business continuity), and investigating and managing any feedback, disputes and complaints.

- **to market our services** to you.
- **to enable the provision and intermediation of banking transactions and financial services** or to carry out orders issued by you, such as in relation to the disclosure of data to Group companies or the Bank's service providers and suppliers.
- **for all other incidental and associated purposes relating to the above purposes.**

We will obtain your consent to the collection, use and disclosure of personal data, unless otherwise permitted or required by law. Where we rely on your consent to process your personal data, you have the right to revoke this consent at any time. Revocations of consent apply only to the future and do not affect the lawfulness of any data processing carried out prior to such revocation. Revoking consent may affect the range of services we can offer. Notwithstanding your withdrawal of consent, we may continue to process and/or store your personal data to the extent permitted or required by law.

We reserve the right to process personal data obtained for one of the above purposes further for any other of those purposes, providing such further processing is compatible with the original purpose or is permitted or prescribed by law (e.g. reporting duties).

3. Will your personal data be transferred to territories outside of Singapore?

Yes, your personal data may be transferred to territories outside of Singapore. If this is the case, we will take appropriate steps to ensure that the overseas recipient is bound by legally enforceable obligations to provide to the transferred personal data a standard of protection that is, at minimum, comparable to the protection under the PDPA, unless we are able to rely on other grounds for transfer under the PDPA.

We will keep your personal data for as long as necessary to fulfil the purposes we collected it for, any other legal or business purposes (including any legal, accounting or reporting requirements), or as required or permitted by applicable laws

4. Does the bank use artificial intelligence (AI)

In the context of the processing of personal data, artificial intelligence (AI) technologies may be used to support internal processes and to analyse information.

Such technologies are used in compliance with all applicable laws respectively data protection regulations and with appropriate technical and organisational security measures ensured. There is no exclusively automated decision-making based on AI. Should such procedures be used in exceptional cases, you will be informed separately, insofar a legal obligation exists to do so.

5. What are your data protection rights?

With regard to personal data in relation to you, your data protection rights under the PDPA are as follows:

- **Right to have data corrected:** You may request that we correct an error or omission in your personal data that is in our possession or control.
- **Right to access data:** You may request access to your personal data that is in our possession or control, and information about the ways in which your personal data has or may have been used or disclosed within a year before the date of your request.
- **Right to withdraw consent:** You have the right at any time to withdraw any consent that is given or deemed to have been given under the PDPA.

You may exercise any of these rights by making your request in writing and sending it to the following contact details:

VP Bank Ltd Singapore Branch
128 Beach Road,
#13-01 Guoco Midtown,
Singapore 189773,
Singapore
dataprotection.sg@vpbank.com

6. Changes to this Data Protection Information

The Bank reserves the right to update this Data Protection Information, including its appendix, at any time.

An up-to-date version will be made available on the website at <https://www.vpbank.com/en-sg/data-protection>. In case of substantial updates to the present Data Protection Information, you will be informed through the website under the Data Protection section or other means of communication.

Version of October 2026

APPENDIX

Additional information in relation to the General Data Protection Regulation (GDPR) and Swiss Data Protection Act (DPA) - Relevant for individuals resident/domiciled in the EU/EEA and/or Switzerland

Under the GDPR and Swiss DPA (applicable for individuals domiciled/resident in the EU/EEA or Switzerland respective), "personal data" is defined as any information relating to an identified or identifiable natural person. The GDPR further explains that an identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier which includes the categories described in Section 1 above of this booklet.

Who has access to personal data and for how long are they stored?

Internally within and outside the Bank, your personal data may be processed only by individuals and units needing access in order to provide or facilitate the Bank's provision of services to you, the fulfilment of our contractual obligations, and for the discharge of our contractual, statutory and regulatory obligations and to safeguard our legitimate interests. Subject to compliance with bank/client confidentiality and data protection rules, other Group companies/, service providers or authorised agents may have access to your personal data for similar purposes. Such third party service providers may include firms engaged in the business of banking, information technology, logistics, printing, collection, advice and consultancy and promotion and marketing. Your personal data may also be disclosed to other lending, financial services and similar institutions (such as correspondent banks, custodian banks, brokers, securities exchanges, information offices) for the purposes of our business relationship with you.

In the event of a legal or regulatory obligation, your personal data may be disclosed to regulatory or governmental authorities, supervisory bodies, institutions of a public character and other professional services institutions (such as auditing companies.). These parties may independently disclose client information, including personal data, to their agents and/or delegates processing such information for the sole purpose of assisting these parties in carrying out their obligations and/or providing their services to the Bank.

Where the Bank discloses personal data to a Group company within the EU or EEA and that personal data is subsequently transferred by the Group company to a party/ies in a country/ies outside the EU/EEA (so called third countries), such transfer by the Group company will

only be done where required for the performance of a contract or in order to take steps prior to entering into a contract, for the provision of services or the processing of orders (e.g. execution of payment orders and securities transactions or issue of a credit card), if you have given us your consent, or if such transmission is required by reasons in the public interest (e.g. for the prevention of money laundering) or by law (e.g. tax reporting duties). Where personal data disclosed by the Bank to a Group company within the EU or EEA is subsequently disclosed by such Group company to a party outside the EU/EEA located in a country that does not provide an adequate protection level for personal data, the Bank or the relevant Group company (as data controllers) shall enter into a legally binding transfer contract with the relevant recipients using model clauses on data protection that are approved by the European Commission. In this regard, you have the right to request in writing for a copy of the relevant document/contract. Such recipients may process the personal data as data processors or as separate data controllers (when processing the personal data for their own purposes) as appropriate.

We process and store personal data for the entire duration of the business relationship, save where obligations pertaining to certain data require their deletion after shorter periods. You should bear in mind that a business relationship with us may last many years. In all other respects the length of time for which data are stored will depend on the need for and purpose of the data processing procedure. Where data is no longer needed in order to fulfil contractual or statutory obligations or to safeguard our own legitimate interests, or where the consent given has been revoked, these data is deleted at regular intervals save where further processing is required on the basis of contractual or statutory data storage periods and documentation requirements or in order to preserve evidence for the duration prescribed by the applicable statutes of limitations.

Is decision-making (including profiling) done on an automated basis?

The decisions we make do not generally rely on any exclusively automated processing of personal data. If we use fully automated processing in certain individual cases, we will inform you separately where so required by law. There are some business areas in which the processing of personal data is at least partly automated. This is done with a view to evaluating certain personal aspects to the extent required by law and regulation (e.g. for the prevention of money laundering), analysing product and service requirements, in the context of lending (to assess loan affordability and your creditworthiness) and in risk management.

The Bank reserves the right to in future subject client data (including data of involved third parties) to automated

analysis and evaluation in order to identify significant personal characteristics of the client or to anticipate future developments and draw up client profiles. These are used most notably in business analysis, customised advisory services and the formulation of special offers and information which the Bank and its Group companies make available to the client as and when required. Client profiles may in future also give rise to automated individual decisions, e.g. automated acceptance and execution of client orders in e-banking. The Bank will ensure that a suitable contact person is available if the client wishes to express a view on an automated decision, where the opportunity for such expression is envisaged by law.

Does the bank use artificial intelligence (AI)?

In the context of the processing of personal data, artificial intelligence (AI) technologies may be used to support internal processes and to analyse information. Such technologies are used in compliance with all applicable legal, regulatory and data protection requirements, including the General Data Protection Regulation (GDPR) and, where applicable, Regulation (EU) 2024/1689 on Artificial Intelligence (AI Act), and with appropriate technical and organisational measures to ensure the security and confidentiality of personal data.

There is no exclusively automated decision-making based on AI. Should such procedures be used in exceptional cases, you will be informed separately, insofar a legal obligation exists to do so.

Additional data protection rights under the GDPR and/or Swiss Data Protection Act

Additional data protection rights under the GDPR (Art. 15-21) and/or Swiss Data Protection Act (Art. 25 DPA), are as follows:

- **Right to obtain information:** You have the right to know whether the Bank is processing your personal data and, if so, what the scope of such processing is (e.g. the categories of personal data processed, the purposes for which they are processed, etc.).
- **Right to have data corrected /deleted and processing restricted:** You have the right to require the Bank to correct any of your personal data that are inaccurate or incomplete. Personal data must be deleted if the data is no longer required for the purposes for which such data was gathered or processed, if you have revoked your consent or if the data was unlawfully processed in the first place. You also have the right to restrict the processing of your personal data.
- **Right of revocation:** You have the right at any time to revoke your consent to the processing of your personal data for one or more purposes, where such processing is conditional upon your explicit consent. The same

applies to the revocation of declarations of consent made prior to the entry into force of the GDPR, i.e. before 25 May 2018. Please note that such revocations apply only to future data processing. Any processing carried out prior to the revocation is unaffected. Likewise, the revocation has no effect on data processing carried out on a different legal basis.

- **Right of data portability:** You have the right to have personal data under the Bank's possession or control, issued to you in a structured, widely used, machine-readable format and to pass such data on to a different responsible party.
- **Right of complaint:** You have the right to submit a complaint to a competent supervisory authority in an EU or EEA member state, e.g. at the place where you are residing or working or at the location in which the cause of the complaint allegedly occurred.

In case of privacy matters in Switzerland, you remain free to contact the competent authority: Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, 3003 Berne, T + 44 58 462 43 95

Information on your right to object

In individual cases and for reasons arising from your own particular circumstances you have the right to object (without any need to meet formal requirements) to the processing of data where this is done in the public interest or to safeguard the legitimate interests of the Bank or a third party.

Further, you have the right to object (without any need to meet formal requirements) to the use of personal data for promotional purposes. If you object to the processing of your personal data for direct advertising, we will no longer process your personal data for these purposes.

The exercise of your rights or objections should preferably be submitted in writing to the Bank's data protection officer, whose contact details are available in the first page of this Data Protection Information. He or she is at your disposal as a contact point for all other matters relating to the Data Protection Laws.

Version of October 2026