Privacy Notice

OCBC BANK LTD., US AGENCIES

[January 1, 2023]

Contents

Oversea-Chinese Banking Corporation ("OCBC") Limited, US Agencies ("US Agencies") is committed to protecting your privacy and ensuring the highest level of security for your personal information. The US Agencies is subject to federal and state privacy regulations, including, the Federal Reserve Bank, the New York Department of Financial Services ("NYDFS"), the California Department of Financial Services ("CADFS"), the New York Federal Reserve Bank, the San Francisco Federal Reserve Bank, and the California Consumer Privacy Act ("CCPA"), as amended by the California Privacy Rights Act ("CPRA") (collectively "Regulations").

Currently, the US Agencies do not have any natural persons as customers and all the US Agencies' customers are institutional customers and their representatives or customer relation managers (the "Customers"). If US Agencies commence a Customer business with a Californian resident, then the US Agencies will adhere to this Privacy Notice.

This Privacy Notice explains our practices with respect to Personal Information we collect and process about you. This includes information we collect through, or in association with, our

website located at https://www.ocbc.com/business-banking/international/usa, our apps that we may provide, our products and services that we may offer from time to time via our website and/or related apps, our offline services/physical locations, our related social media sites, or otherwise through your interactions with us (the website, apps, products, services, physical locations, and social media pages, collectively, the "Services").

Please review the following to understand how we process and safeguard Personal Information about you. By using any of our Services, whether by visiting our website or otherwise, and/or by voluntarily providing Personal Information to us, you acknowledge that you have read and understand the practices contained in this Privacy Notice. This Privacy Notice may be revised from time to time, so please ensure that you check this Privacy Notice periodically to remain fully informed.

Defined terms in this Privacy Notice are capitalized and outlined in the Glossary.

1. The Purpose?

This Privacy Notice supplements OCBC's policies and procedures, by outlining how the US Agencies comply with the CPRA. Please refer to https://www.ocbc.com/business-banking/international.page for the list of the US Agencies.

2. What are the sources of Personal Information we collect from about you?

We may collect Personal Information about you from the following sources:

2.1 Personal Information we directly receive from you

We may collect Personal Information (such as your name, contact details, financial details, employment and education details, nationality, date and place of birth, marital status, passport or other identification details and details of visits to our premises) that you provide to us when you:

- Submit applications to open an account; and
- Subsequently correspond with us.

2.2 Personal Information we collect about you automatically or indirectly

When you interact with us on our websites, we automatically receive and record information on our server logs from your browser. We may employ cookies in order for our sever to recognize a return visitor as a unique user including, without limitation, monitoring information related to how a visitor arrives at the website, what kind of browser a visitor is on, what operating system a visitor is using, a visitor's IP address, and a visitor's click stream information and time stamp (for example, which pages they have viewed, the time the pages were accessed and the time spent per web page).

Cookies are small text files stored in your computing or other electronic devices, which allow us to remember you or other data about you. The cookies placed by our server are readable only by us to remember you or other data about you. The cookies placed by our server are readable only by us, and cooking cannot access, read, or modify any other data on an electronic device. All

web-browser offer the option to refuse any cookie, and if you refuse our cookie then we do not gather any information on that visitor.

Should you wish to disable the cookies associated with these technologies, you may do so by changing the setting on your browser. However, you may not be able to enter certain parts of our website.

We may also collect Personal Information from you when you interact with our staff, including customer services officers, relationship managers and other representatives, for example, via telephone calls (which may be recorded), letters, fax, face-to-fact meeting and email.

2.3 Personal Information we collect about you from our service providers

Categories of Personal Information	**We collect and process your Personal Information for the following business and commercial purposes from our Service Providers**
Identifiers such as: name, identification number, nationality, passport information, tax information, date and place of birth, postal address, business physical address, occupation, signature; professional or employment-related information; and education information, criminal records	• To facilitate our account opening process • To verify customer information as a part of our due diligence process • To comply with our vendor due diligence process

3. How do we use your Personal Information?

Categories of Personal Information	**We collect and process your Personal Information for the following business and commercial purposes**
Identifiers such as: name, identification number, nationality, passport information, tax information, date and place of birth, postal address, business physical address, occupation, signature; professional or employment-related information; and education information, criminal records	• To facilitate our account opening process • To verify customer information as a part of our due diligence process • To comply with our vendor due diligence process
Personal Information described in subdivision (e) of Section 1798.80 such as: financial and transactional (e.g., details about your accounts with us and payments to and from your accounts with us)	• To enable us to process your transactions • To comply with our regulatory requirements
Audio, electronic, visual, thermal, olfactory, or similar information such as: CCTV video images (of visitors to our physical offices) and recording telephone calls	• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those response for that activity • As necessary or appropriate to protect the rights, property, and safety of us and other third parties • To comply with our regulatory requirements • To administer training and development

Categories of Personal Information	We collect and process your Personal Information for the following business and commercial purposes
IP address and device information	• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those response for that activity
Sensitive Personal Information such as geolocation and biometric data	• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those response for that activity
Sensitive Personal Information such as the contents of any written complaints	• To verify or maintain the quality or safety of the Services and to improve, upgrade, or enhance the Services

4. With which third parties do we share your Personal Information?

We may share your Personal Information with the following third parties in certain circumstances:

Our OCBC Group Entities: Due to the global nature of OCBC banking operations, we may disclose your Personal Information with our group entities to fulfill the purposes described above. This may include transferring your Personal Information to other countries (including countries other than where you are based that have a different data protection regime). For a full list of our entities and third parties that we may share your Personal Information, please contact us as set out below.

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, such as our infrastructure and IT service providers (including for email archiving) and our external auditors and advisors (including lawyers, accounting firms).

In the course of providing such Services, these service providers may have access to your Personal Information. However, we will only provide our service providers with personal information, which is necessary for them to perform their Services, and we require them not to use your information for any other purpose.

Third Parties Permitted by Law: In certain circumstances, we may be required to disclose or share your Personal Information in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies or to judicial or administrative authorities).

We may also disclose your Personal Information to third parties where disclosure is both legally permissible and necessary for 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 Information to third parties in connection with a reorganization, restructuring, merger, acquisition, or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Privacy Notice.

Third Party Websites and Services: As a convenience, we may reference or provide links to third-party websites and Services, including those of unaffiliated third parties, our affiliates,

service providers, and third parties with which we do business. When you access these third-party services, you leave our Services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third-party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the Privacy Notices or policies for such third-party services for information about how they collect, use, and process personal data.

5. Do we transfer Personal Information outside of the US?

Your Personal Information may be transferred to and processed in OCBC group entities and our service providers. This list of jurisdictions may be subject to change. We will take all steps that are reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Privacy Notice as well as applicable data protection laws, including, where relevant, putting in place appropriate measures with our affiliates and service providers such as standard contractual clauses.

6. What are your California rights?

Please note that we do not you share Personal Information with third parties for their own direct marketing purposes.

Also, the CPRA defines Sale and Sharing broadly. We do not Sell or Share your Personal Information as these terms are defined under the CPRA. Furthermore, the CPRA provides California residents the following additional rights:

- **Data Portability**: You have the right to request a copy of Personal Information we have collected and maintained about you.

- **Right to Know**: You have the right to request that we disclose certain information to you about the Personal Information we collected, used, disclosed, and sold about you. This includes a request to know any or all of the following:
    (i) The categories of Personal Information collected about you;
    (ii) The categories of sources from which we collected your Personal Information;
    (iii) The categories of Personal Information that we have shared, sold or disclosed about you for a business purpose;
    (iv) The categories of third parties to whom your Personal Information was sold, shared or disclosed for a business purpose;
    (v) Our business or commercial purpose for collecting, selling or sharing your Personal Information; and
    (vi) The specific pieces of Personal Information we have collected about you.

- **Right to Deletion**: You have the right to request that we delete the Personal Information we collected from you and maintained, subject to certain exceptions. Please note that if you request deletion of your Personal Information, we may deny your request or may retain certain elements of your Personal Information if it is necessary for us or our service providers to:

(i) Complete the transaction for which the Personal Information was collected, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between our business and you.
(ii) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for that activity.
(iii) Debug to identify and repair errors that impair existing intended functionality.
(iv) Exercise free speech, ensure the right of another Employee to exercise his or her right of free speech, or exercise another right provided for by law.
(v) Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
(vi) Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the deletion of the information is likely to render impossible or seriously impair the achievement of such research, if you have provided informed consent.
(vii) To enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
(viii) Comply with a legal obligation.
(ix) Otherwise use the personal information, internally, in a lawful manner that is compatible with the context in which you provided the information.

- **Right to Non-Discrimination**. We will not discriminate against you for exercising any of your California rights. We will not (i) deny you goods or Services, (ii) charge you different prices or rates for goods or Services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of goods or Services, (iv) suggest that you may receive a different price or rate for goods or Services or a different level or quality of products or Services, and (v) retaliate against an Employee, applicant for employment, or independent contractor, for exercising their rights.

- **Right to Correct**. You have the right to correct inaccurate Personal Information about you. Once we receive and verify your request, we will use commercially reasonable efforts to correct the inaccurate Personal Information about you.

- **Right to Limit**. You have the right to request us to limit the use and disclosure of a certain Sensitive Personal Information.

7. How do we protect your Personal Information?

We have implemented technical and organizational security measures to safeguard the Personal Information in our custody and control. Such measures include, for example, limiting access to Personal Information only to Employees and authorized service providers who need to know such information for the purposes described in this Privacy Notice; 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, sorting 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 Information that affords the appropriate level of security; confirming the intended recipient of Personal Information as well as other administrative, technical and physical safeguards.

However, no method of safeguarding information is completely secure. While we use measures designed to protect personal data, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure, and we cannot warrant that information you transmit utilizing the Services is or will be secure.

8. How long do we keep your Personal Information?

We only retain your Personal Information 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 Information, we will remove it from our systems and records and/or take steps to anonymize it so that you can no longer be identified from it unless we need to retain your information for a longer period to comply with regulatory or legal requirements or for our legitimate interest to respond to queries or complaints, prevent fraud and financial crime, or to respond to requests from regulators.

9. Third Party Websites

As a convenience, we may reference or provide links to third party websites and services, including those of unaffiliated third parties, our affiliates, service providers, and third parties with which we do business. When you access these third party services, you leave our services, and we are not responsible for, and do not control, the content, security, or privacy practices employed by any third-party websites and services. You access these third party services at your own risk. This Privacy Notice does not apply to any third-party services; please refer to the privacy notices or policies for such third-party services for information about how they collect, use, and process your Personal Information.

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

We will knowingly collect Personal Information from individuals under the age of sixteen (16) years. If you are under the age of 16, you should not provide information to us. By using the Services, you represent that you are 18 years of age or older, or are 16 years of age or older and have valid parental or guardian consent to do so. If we become aware that a person under 16 has provided personal information to us, we will remove such personal information from our files.

11. How can you contact us?

To exercise your rights, you must provide us with sufficient information to allow us to verify your identity, and describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Once we receive the information you provide to us, we will review it and determine if more information is necessary to verify your identity as required by law, and we may request additional information in order to do so.

To exercise your California privacy rights described above, please submit a verifiable request to us by:

- Calling us at (888) 320-2609; or
- Emailing us at ContactUSA@ocbc.com.

Only you, or a person authorized by you to act on your behalf, may make a verifiable request related to your Personal Information. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative.
- Given the sensitivity of your Personal Information that we collect and retain, we will need to verify your identity with at least two pieces of information, such as your name (first and last) and address.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.
- We may deny your request if we are unable to verify your identity or have reason to believe that the request is fraudulent.
- Request by an Authorized Agent:

If any authorized agent submits a request on your behalf, in order to confirm that person or entity's authority to act on your behalf and verify the authorized agent's identity, we require a call be made to the toll-free number provided above, or an email be sent to ContactUSA@ocbc.com, along with all of the below items:

  - To verify your authorization to request on behalf of a California resident, provide one or more of the following: (1) California Secretary of State authorization, (2) written permission from the California resident, or (3) power of attorney.
  - To verify your identity, provide: (1) evidence of your identity, and (2) your name (first and last) and address.
  - To verify the identity of the California resident for whom the request is being made, provide the individual's name (first and last) and address.

We may request additional information to verify your identity and/or authority to make the request. We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We will only use Personal Information provided in a verifiable request to verify the request's identity or authority to make the request.

We will acknowledge receipt of the request within ten (10) business days of its receipt. We will respond to a verifiable request within forty-five (45) days of its receipt. If we require more time

(up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability requests, we will provide the responsive information in a portable and, to the extent technically feasible, in a readily useable format that allows you to transmit the information to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

12. Which version of this Privacy Notice applies?

This 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 Privacy Notice from time to time. If we decide to change our Privacy Notice we will notify you of these changes by posting the date at the top of the Privacy Notice or by regular or electronic mail.

13. Glossary

Personal Information: Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

Sell, Selling, Sale, or Sold: Means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer's personal information by the business to a third party for monetary or other valuable consideration.

Sensitive Personal Information: Means Personal Information that reveals (a) social security or other state identification number; (b) account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) geolocation; (d) racial or ethnic origin, religious or philosophical beliefs, or union membership; (e) the contents of mail, email, or text messages, unless the business is the intended recipient of the communication; and (f) genetic data.

In addition, Sensitive Personal Information includes processing of biometric information for purposes of identifying a California individual; Personal Information collected and analyzed concerning a Californian's health, and Personal Information collected and analyzed concerning a Californian's sex life or sexual orientation.

Share or Sharing: Means communicating orally, in writing, or by electronic or other means, a Californian's Personal Information to a third party for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.