

Data Protection Policy

This Data Protection Policy applies to all Personal Data (as defined below) collected by SEAVI Advent Private Equity and its affiliated entities (referred to herein as “**SEAVI Advent**”, “**us**”, “**we**” or “**our**”). We consider privacy to be fundamental to our relationship with you.

This policy governs the collection, use and disclosure of Personal Data submitted to SEAVI Advent, including through seavi.com.sg, and explains how we collect and handle Personal Data of individuals and comply with the requirements of the Personal Data Protection Act 2012 of Singapore and its regulation(s) (“**PDPA**”). Please take a moment to read this Data Protection Policy so that you know and understand the purposes for which we collect, use and disclose your Personal Data.

By interacting with us, submitting information to us, or signing up for any products and services offered by us, you agree and consent to SEAVI Advent, as well as our respective representatives and/or agents collecting, using, disclosing and sharing amongst themselves your Personal Data, and disclosing such Personal Data to SEAVI Advent’s authorised service providers and relevant third parties in the manner set forth in this Data Protection Policy.

This Data Protection Policy supplements but does not supersede nor replace any other consent you may have previously provided to SEAVI Advent in respect of your Personal Data, and your consent herein is additional to any rights which SEAVI Advent may have at law to collect, use or disclose your Personal Data.

SEAVI Advent may from time to time update this Data Protection Policy to ensure that this Data Protection Policy is consistent with future developments, industry trends, and/or any changes in legal or regulatory requirements. Subject to your rights at law, you agree to be bound by the prevailing terms of this Data Protection Policy as updated from time to time on our website. Please check back regularly for updated information on the handling of your Personal Data.

1. Personal Data

- 1.1. In this Data Protection Policy, “**Personal Data**” refers to any data, whether true or not, about an individual who can be identified (a) from that data; or (b) from that data and other information to which we have or are likely to have access to, including data in our records as may be updated from time to time.
- 1.2. Examples of such Personal Data you may provide to us may include:
 - (a) contact information, such as your name, address, email address and telephone numbers;
 - (b) employment information such as your job title, place of work, compensation and work history;
 - (c) identification information such as your signature, date of birth, national identification or social security (or similar) number, proof of address, driver’s license, passport and other government identification information and/or numbers;
 - (d) background information, such as information needed for or revealed by KYC, fraud, terrorist financing, sanctions and AML checks, investor accreditation and consents; and
 - (e) financial information such as information about your assets, income, net worth, amounts and type of investments, profits and loss allocations, capital account balances, commitments, withdrawals, redemptions, subscriptions and contributions, account data, other investment participation information, funds transfer information, bank account details, beneficiaries, positions, percentages of fund, share or option numbers and values, vesting information, investment history, and transaction and tax information.

2. Collection of Personal Data

- 2.1. We collect Personal Data from clients, investors, limited partners, business contacts, partners, personnel, contractors and other individuals. Such Personal Data may be provided to us in forms filled out by individuals, face to face meetings, email messages, telephone conversations, subscription agreements, partnership agreements, through our website or provided by third parties. If any individual contacts us, we may keep a record of that contact. We also collect Personal Data where necessary for business purposes or to meet the purposes for which the individuals have submitted the information. We endeavor to ensure any Personal Data collected by us or on our behalf is accurate and complete.

- 2.2. If you provide us with any Personal Data relating to a third party (e.g. information of your spouse, children, parents, and/or employees), by submitting such information to us, you represent and warrant to us that you have obtained the consent of the third party to provide us with their Personal Data for the respective purposes.
- 2.3. You should ensure that all Personal Data submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the services you have requested.

3. **Purposes for the Collection, Use and Disclosure of Your Personal Data**

- 3.1. Generally, SEAVI Advent collects, uses and discloses your Personal Data for the following purposes:
 - (a) administering and managing our relationship with you, including dealing with any requests or inquiries which you may have and providing services to you;
 - (b) meeting or complying with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory bodies which are binding on SEAVI Advent;
 - (c) conducting “know your customer” and anti-money laundering due diligence required to be performed in connection with admitting a new investor to one (1) or more investment funds and accounts that are managed, directly or indirectly, by us (“**Funds**”);
 - (d) conducting periodic reviews on information gathered in (c);
 - (e) for recruitment purposes;
 - (f) for general management and reporting purposes, such as invoicing and account management; and
 - (g) all other purposes related to our business.

4. **Disclosure of Personal Data to Third Parties**

- 4.1. SEAVI Advent will take reasonable steps to protect your Personal Data against unauthorised disclosure. Subject to the provisions of any applicable law, your Personal Data may be disclosed by SEAVI Advent, for the purposes listed above (where applicable), to the following entities or parties, whether they are located overseas or in Singapore:
 - (a) agents, contractors or third party service providers who provide operational services to SEAVI Advent, such as courier services, telecommunications, information technology, payment, printing, billing, payroll, processing, technical services, or other services to SEAVI Advent;
 - (b) any business partner, investor, limited partner, assignee or transferee (actual or prospective) to facilitate business asset transactions (which may extend to any merger, acquisition or asset sale) involving SEAVI Advent;
 - (c) our professional advisers such as consultants, auditors and lawyers;
 - (d) relevant government ministries, regulators, statutory boards or authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes imposed by any governmental authority; and
 - (e) any other party whom you authorise us to disclose your Personal Data to.

5. **Data Security**

- 5.1. SEAVI Advent will take reasonable efforts to protect Personal Data in our possession or our control by making reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks. However, we cannot completely guarantee the security of any Personal Data we may have collected from or about you, or that for example no harmful code will enter our websites, applications, and digital services (for example viruses, bugs, trojan horses, spyware or adware). You should be aware of the risks associated with using websites, applications, and digital services.

6. Access to and Correction of Personal Data

- 6.1. Where an individual submits a request, we will provide the requesting party access to his/her own Personal Data or other appropriate information on his/her own Personal Data in accordance with the requirements of the PDPA, within a reasonable period.
- 6.2. Where an individual submits a request, we will correct any error or omission in the individual's Personal Data that is in our possession or control, in accordance with the requirements of the PDPA, within a reasonable period.

7. Withdrawal of Consent

- 7.1. Where an individual gives reasonable notice to us of his/her intention to withdraw any consent given or deemed to have been given in respect of our collection, use or disclosure of his/her Personal Data, we will inform the individual of the consequences of his/her withdrawal of consent. We shall seek to process your request within 14 business days of receiving it. Any collection, use or disclosure of the said individual's Personal Data will cease unless it is required or authorised under applicable laws. Should the individual decide to cancel his/her withdrawal of consent, please inform us in writing or email using the contact details provided below.
- 7.2. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

8. Accuracy of Personal Data

- 8.1. We will make a reasonable effort to ensure the accuracy and completeness of Personal Data collected by us or on our behalf. In order to ensure that your Personal Data is current, complete and accurate, please updates us if there are any changes to your personal data using the contact details provided below.

9. Data Security and Restriction of Access

- 9.1. SEAVI Advent is committed to maintaining the confidentiality, integrity and security of your Personal Data and we take precautions to protect such data. These precautions include the adoption of certain physical, electronic, and procedural safeguards and procedures designed to maintain and secure your Personal Data from inappropriate disclosure in accordance with applicable laws and regulations, while allowing your needs to be met.
- 9.2. SEAVI Advent restricts access by employees and service providers to the Personal Data of investors or clients of the Funds to those employees and service providers that use such information in connection with the offering, formation and operation (including investment-related activities) of new and existing Funds or managing and servicing investor accounts.
- 9.3. Access to confidential client Personal Data is restricted to those employees who need to know such information in connection with their duties and responsibilities. Employees who are authorised to have access to confidential client Personal Data are required to keep such Personal Data secure and confidential. All electronic and computer files containing confidential client Personal Data are kept on password secured computers and firewall protected networks.

10. Retention of Personal Data

- 10.1. We will cease to retain Personal Data as soon as it is reasonable to assume that the purpose for collection of such Personal Data is no longer being served by such retention and such retention is no longer necessary for legal or business purposes.

11. Transfer of Personal Data outside of Singapore

- 11.1. We will ensure that any transfers of Personal Data to a territory outside of Singapore will be in accordance with the PDPA so as to ensure a standard of protection to Personal Data so transferred that is comparable to the protection under the PDPA.

12. External Websites

- 12.1. This website contains links to external websites. We make no representations as to the quality, suitability, functionality or legality of the material on external websites that are linked to, or to any goods and services available from, such websites. The material is only provided for your interest and convenience. We do not monitor or investigate such external websites and we accept no responsibility or liability for any loss arising

from the content or accuracy of the material and any opinion expressed in the material should not be taken as our endorsement, recommendation or opinion. This policy does not extend to your use of such external websites. You are advised to read the privacy policy or statement of such external websites before using them.

13. **Governing Law**

- 13.1. This Data Protection Policy and your browsing of our website shall be governed by and construed in accordance with the laws of Singapore.

14. **Data Protection Officer**

- 14.1. Please contact our Data Protection Officers if there are any questions or concerns about how we are handling your Personal Data or if you believe that information we have collected about you is incorrect or out of date in the following manner:

Contact No.	+656339 9090
Email Address	bkhoe@seavi.com.sg / kenlee@seavi.com.sg
Address	90 Sophia Road, Singapore 228160

15. **Modifications**

- 15.1. We reserve the right to modify or amend this Policy at any time. Your continued use of our services constitutes your agreement and acceptance to be bound by the prevailing terms of this Policy as updated from time to time on our website.