

## **AMUNDI MALAYSIA**

### **PERSONAL DATA PROTECTION POLICY**

This Personal Data Protection Policy ("Policy") has been prepared pursuant to the **Personal Data Protection Act 2010 of Malaysia** (the "PDPA") to explain what personal data Amundi Malaysia may collect, use or disclose and sets out how Amundi Malaysia will handle personal data in accordance with the PDPA and the laws of Malaysia.

For the purposes of this Policy, please note that "**Amundi Malaysia**" refers to Amundi Malaysia Sdn. Bhd. and its Islamic fund management subsidiary, Amundi Islamic Malaysia Sdn. Bhd.

This Policy explains:

- The type of personal data we collect and how we collect it
- How we use your personal data
- The parties that we disclose the personal data to
- Where we transfer your personal data
- The choices we offer, including how to access and update your personal data

For the avoidance of doubt, this Privacy Policy is applicable only if you are an individual. This Policy is also intended to provide corporate and institutional customers (collectively "institutional customers") with sufficient information to allow them to provide notice to relevant individuals and obtain consent from relevant individuals in relation to Amundi Malaysia's collection, use and disclosure of personal data described in this Policy and/or to allow such institutional customers to determine that their disclosure of the personal data described in this Policy to Amundi Malaysia is in accordance with PDPA. Such relevant individuals may include the institutional customer's beneficial owners, partners, committee members, directors, officers or authorized signatories, representatives, dealers, employees and other natural persons related to the institutional customer.

Where a relevant individual fails to supply relevant information or data or withdraw consent in respect of use and/or disclosure of relevant information or data as described in this Policy, Amundi Malaysia may be unable to open or continue to manage the account, or establish or continue to provide financial services to the institutional customer. Amundi Malaysia will inform the institutional customer of likely consequences where the relevant individual withdraws consent given or deemed to have been given.

*For the purposes of this Policy, please note that:*

- *"Personal data" refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an organisation has or is likely to have access. This includes unique identifiers (e.g. NRIC number, passport number); as well as any set of data (e.g. name, age, address, telephone number, occupation, etc.) which when taken together would be able to identify the individual.*
- *"we", "us" and "our" refers to Amundi Malaysia "you" and "your" refers to you*

#### **What Kind of Personal Data We Collect And How We Collect it:**

In order to enable us to deal with your inquiries, manage your investment portfolios for you or the organisation that you represent and/or to generally provide you with our products and services ("products and services"), we may need to and/or may be required to collect, use, disclose and store (i.e. "process") personal data and financial information about you, including but not limited to:

- a. personal data to establish your identity and background;
- b. personal data to establish your financial standing and creditworthiness, where required; and/or
- c. personal data that you provide when you apply for any of our products and services.

We may obtain this information from you and/or from a variety of sources, including but not limited to:

- a. through your relationship with us, for example information provided by you in application forms, agreements you enter into with us, when using our products or services;
- b. through your verbal and written communications with us;
- c. from an analysis of the way you use and manage your investment products and/services with us, from the transactions you make and from the payments which are made to/from your investment(s);
- d. from third parties connected with you, such as the organisations that you represent or your financial advisers, subject to your prior consent;
- e. information and data collected such as images, photographs, videos, CCTV footage, voice recordings when you participate in events organised by Amundi Malaysia, such as functions, seminars or contests; and/or
- f. from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

### **How We Use Your Personal Data**

We may use your personal data for one or more of the following purposes:

- a. to confirm and verify your identity;
- b. to assess your application(s) /inquiry(ies) for our products and services;
- c. to process your transactions in relation to your investment(s) in any of our products and services;
- d. to manage and maintain your investment(s) portfolios/accounts with us;
- e. to better manage our business and your relationship with us;
- f. to notify you about benefits and changes to the features of products and services;
- g. to respond to your enquiries and complaints and generally to resolve disputes;
- h. to post your photograph and other visual images of you on Amundi Malaysia's intranet, websites and publications;
- i. to update, consolidate and improve the accuracy of our records;
- j. to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- k. to conduct research for analytical and/or statistical purposes;
- l. for audit, compliance and risk management purposes;
- m. to assess financial and insurance risks;
- n. to conduct anti-money laundering checks; for crime detection, prevention and prosecution; and/or
- o. for any other purpose that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

We will ask for your consent before using your personal data for a purpose other than those that are set out in this Policy, in the information memorandums/prospectuses and application forms of our funds, in your agreement(s) with us or in the agreement(s) with our institutional customer(s).

### **Disclosure Of Your Personal Data**

As a part of providing you with our products and services and the management and/or operation of the same, we may be required or need to disclose information about you and/or your investment portfolios with us to the following third parties:

- a. companies and/or organisations that act as our agents and/or professional advisers;
- b. companies and/or organisations that assist us in processing and/or otherwise fulfilling transactions that you have requested;
- c. any other person notified by you as authorised to give instructions on your behalf;
- d. any third party as a result of any restructuring of your investments or the sale of debts, or the acquisition or sale of any company by Amundi Malaysia or its related companies, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us; and/or
- e. any competent authority(ies) and/or regulator(s),

subject at all time to any laws, (including regulations, guidelines and/or obligations) applicable to Amundi Malaysia.

We will otherwise treat your personal data as private and confidential and will not disclose your information to anyone outside Amundi Malaysia except:

- a. where you have given permission;
- b. where we are required or permitted to do so by law, regulations or guidelines;
- c. where required or authorised by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over Amundi Malaysia;
- d. where we may transfer rights and obligations under this agreement;
- e. where we are required to meet our obligations to any relevant regulatory authority.

### **Transferring Your Personal Data Overseas**

Amundi Malaysia may transfer your personal data to our Head Office in France to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information in accordance with Amundi Group's programmes for compliance with sanctions or prevention or detection of money laundering, terrorist financing or other unlawful activities or for any other permitted purposes as described in this Policy. Your personal data will be protected in accordance with PDPA and in accordance with the local practices and laws, rules and regulations (including any governmental acts and orders) in such countries.

### **Security Of Your Personal Data**

Amundi Malaysia places great importance on ensuring the security of your personal data. We regularly review and implement up-to-date technical and organisational security measures when processing your personal data.

Employees of Amundi Malaysia are trained to handle the personal data securely and with strict confidentiality, failing which they may be subject to disciplinary action.

### **Retention Of Your Personal Data**

Amundi Malaysia will retain your personal data in compliance with this Policy, in the terms and conditions of the trust deeds of our funds, in your agreement(s) with us or in the agreement(s) with the institutional customer :

- (i) for the duration of your relationship with us;
- (ii) for such period as may be necessary to protect the interests of Amundi Malaysia and/or its customers as may be deemed necessary; and/or
- (iii) where otherwise required by the law.

### **What If Personal Data Provided By You Is Incomplete?**

It may be obligatory for you in some instances to provide certain personal data to enable us to process your application or provide you with our products or services. If you are unable to or decline to provide such obligatory personal data, we may not be able to process your application or provide you with the said products or services.

### **Your Rights To Access And Correct Your Personal Data**

We can assist you to access and correct your personal data provided to us.

Where you wish to have access to your personal data in our possession, or where you are of the opinion that such personal data held by us is inaccurate, incomplete, misleading or where relevant, not up-to-date, you may make a request to us by contacting us at the address detailed at the end of this Policy or alternatively you may make such request via our Data Access Request Form or Data Correction Request Form respectively. These forms are available at our office.

We will use reasonable efforts to comply with your request to access or correct your personal data within 21 days of receiving your duly completed Data Access Request Form/Data Correction Request Form and the relevant processing fee (if any).

Please note that we may withhold access to your personal data in certain situations, for example when we are unable to confirm your identity, where the information reveals personal data about another person, where such information is subject to legal privilege or if such provision of information will be contrary to national interest or if such refusal is permitted under PDPA. Nevertheless, we will notify you of the reason(s) for not being able to accede to your request, subject to any legal or regulatory constraints.

Please also note that Amundi Malaysia may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

You can also assist us to keep your personal data (such as your current mailing address) up to date, as it will enable us to serve you better.

### **Enquiries/Complaints/Communication**

Should you have any queries, concerns or complaints in relation to this Privacy Policy, kindly contact us during office hours between 9.00 am to 6.00 pm – Monday to Friday at the following contact point:

#### **Amundi Malaysia Sdn Bhd**

Address : Level 29, Integra Tower, The Intermark,  
348, Jalan Tun Razak, 50400 Kuala Lumpur

Attention : Data Protection Officer