

## Privacy Policy

### 1. Compliance with the Singapore Personal Data Protection Act

Kenedix Asia Pte. Ltd. (the “Company”) collects, uses, and discloses (collectively, “processes”) personal data in compliance with the Singapore Personal Data Protection Act (the “Act”) and this Privacy Policy (this “Policy”).

### 2. Purpose of Processing Personal Data

The Company may process the following categories of personal data for the purposes set out below and disclose such data to the recipients indicated. The Company ensures that, for such processing, consent has been obtained from the data subject in accordance with the Act or that the processing falls within an exception under the Act where consent is not required.

| Type of Personal Data  | Purpose of Collection and Use  | Recipients and Purpose of Disclosure   |
|--|--|--|
| Personal data of employees and job applicants (including name, age, gender, address, telephone number, email address, educational background, employment history, NRIC number, bank account details, employment information, etc.) | Collected directly from the data subject in writing or verbally for recruitment and employment decisions and management, and to comply with the Company’s legal obligations as an employer | May be disclosed to the Company’s affiliates or service providers located in Singapore or Japan for the purposes stated in the left column |
| Personal data of directors of client companies (passport details)  | Collected directly from the data subject by obtaining a copy of the passport for identity verification and AML screening as required by law at the time of fund establishment              | May be disclosed to service providers (due diligence firms) located in Singapore for AML screening   |

|  |   |  |
|--|---|--|
| Personal data of tenants of residential properties invested in by the Company's managed funds (including lease contract details, address, age range, gender, marital status, household size, employment type, employer details, household income, nationality, etc.) | Collected directly from the data subject in writing or verbally for the purpose of understanding and managing lease terms                                     | Not applicable   |
| Personal data contained in enquiry emails of the Company's website visitors (including name, telephone number, email address, purpose of enquiry, job title, company name, etc.)   | Collected directly from the data subject who sent enquiry emails for responding to enquiries and for managing and improving the Company's website or services | May be disclosed to service providers located in Singapore or Japan for the purposes stated in the left column |

Note 1: In addition to the above, regardless of the type of personal data, the Company may disclose personal data to authorities where required under Singapore law or applicable foreign laws, or upon request by such authorities. Furthermore, in the event of business reorganizations or integrations such as mergers and acquisitions, the Company may disclose personal data to third parties within or outside Singapore to the extent necessary for the implementation or preparation of such transactions.

Note 2: The Company also processes business contact data (such as business card information) of individuals belonging to corporate counterparties or individual counterparties. As business contact data is not subject to regulation under the Act, it is not included in the above table.

### 3. Compliance with Cross-Border Transfer Requirements

When disclosing personal data collected in Singapore to third parties located outside Singapore, the Company implements measures to comply with the cross-border transfer

requirements under the Act, such as entering into contractual arrangements for the protection of personal data or obtaining the data subject's consent to the transfer.

#### **4. Security Measures for Personal Data**

The Company retains personal data only for as long as necessary to fulfill the purposes specified in Section 2 of this Policy and implements reasonable physical, technical, and organizational measures, including internal policies, to safeguard personal data.

#### **5. Rights of Data Subjects**

Data subjects whose personal data is processed by the Company have certain rights under the Act, including the right to know how their personal data is processed, the right to request correction of inaccurate personal data, the right to withdraw consent to processing, and the right to data portability (which is, at the time of this Policy, not introduced yet but once introduced), among other rights provided under the Act. Data subjects may exercise these rights by notifying the point of contact specified in Section 6 of this Policy. Upon receiving such a request, the Company will verify the identity of the requester and respond in accordance with the Act if the statutory requirements are met. If the Company is unable to comply because the requirements are not met, the Company will provide the reasons.

#### **6. Contact Information**

For any requests or enquiries regarding the Company's processing of personal data, please contact the Company's Data Protection Officer using the contact details below:

Company Name: KENEDIX ASIA PTE. LTD.

Address: 160 ROBINSON ROAD #10-07 SBF CENTER 068914

Data Protection Officer Contact: [info@kenedix-asia.com](mailto:info@kenedix-asia.com)

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