

July 2018

# Schwab Singapore Privacy Policy

*You trust us with your personal information, and we take that trust seriously. Read below to learn about how we use your private information and the steps we take to ensure that it is secure.*

## Information We Collect, Use and Disclose

When you open an account with Charles Schwab Singapore Pte Ltd. (“Charles Schwab Singapore,” “Charles Schwab,” “we,” “our” or “us”), you are required to provide personal data and other personal and contact information. This information may be used for the purposes of, amongst others, managing your account, completing business for you and contacting you about your account and various services we offer. The term “personal data” shall have the meaning ascribed to it under the Personal Data Protection Act 2012.

For more information on the purposes for which we collect, use or disclose your personal data, please also refer to the Schwab One® Singapore Account Terms and Conditions and the Schwab Corporation Privacy Policy.

Pursuant to the Personal Data Protection Act 2012 of Singapore, which went into effect July 2, 2014, Charles Schwab Singapore is required to obtain your consent for the collection, use and/or disclosure of your personal data by Charles Schwab Singapore, and for you to receive marketing promotions from Charles Schwab Singapore. If we have collected or were already in possession of your personal data prior to July 2, 2014, we may have collected and been using your personal data for the original purposes for which your personal data was collected, including, but not limited to, for marketing/promoting products or services to you. Subject to all applicable provisions under the Personal Data Protection Act, we may continue to use your personal data for such original purposes unless you withdraw consent for such use or indicate to us that you do not consent to such use of your personal data. The collection of your information is compliant with Singapore and U.S. regulatory guidelines and includes, but is not limited to, your name, physical address, telephone number, identification number, and employment and financial information. Additionally, we may record and retain your communications with us for quality control purposes as well as for assistance in resolving misunderstandings.

## Supplementation of Information

From time to time, it is necessary to supply the information we receive to third-party sources. For example, to verify a customer’s identity, we may use personal identification to request a screening report from an outside firm so that we may access additional data on an individual. Before using personal information for this purpose, the third party must agree that it will not share or sell the information we provide to other third parties. If you do not consent to us supplying such information, we may not be able to provide the products or services that you have requested.

## Requesting Access to/Correction of/Updating of Personal Information

To change your personal information, log in to your Schwab account and update “My Profile.”

You also may change your personal information by contacting customer service at +65-6536-3922, contacting the data protection officer of Charles Schwab Singapore at telephone number +65-6536-3922 or fax number +65-6536-1151, by sending a

secure message from the Message Center within the Schwab platform or by submitting the request in writing to:

Charles Schwab Singapore Pte Ltd.  
1 George St.  
#07-01A  
Singapore 049145  
Attention: Data Protection Officer

You hereby acknowledge that Charles Schwab Singapore is entitled to, and may charge, a fee for attending to your access request.

## Request to Withdraw Consent

You may withdraw your consent for the collection, use and/or disclosure of your personal data in our possession or under our control or to receive marketing promotions from us. You may do so at any time by using the form prescribed by Charles Schwab Singapore for that purpose. Please contact the data protection officer of Charles Schwab Singapore by writing to him at 1 George Street, #07-01A, Singapore 049145 or by calling +65-6536-3922 if you wish to request a copy of such form.

However, depending on the circumstances and the nature/extent of your withdrawal, your withdrawal of consent may result in Charles Schwab Singapore’s inability to open or maintain account(s) for you or to provide you with services and products, and hence may result in the termination of your relationship and/or account(s) with Charles Schwab Singapore or result in other consequences of a legal nature which may arise by virtue of your legal relationship with Charles Schwab Singapore.

## Sharing

We do not sell customer information (current or former) to third parties. Any information shared by us is done so to fulfill our legal and regulatory requirements or to provide you with the products and services you have requested. We would like to reiterate that when we supply personal information to outside firms, we require that the information be kept confidential.

Without limiting the list of third parties set out under the Schwab One® Singapore Account Terms and Conditions, please note that we share selected information as part of normal business operations and for normal custodial, legal and/or regulatory purposes required by our service partners, the U.S. Internal Revenue Service, the U.S. Securities and Exchange Commission, the Monetary Authority of Singapore, the Suspicious Transactions Reporting Office (in Singapore), the Inland Revenue Authority of Singapore and other regulatory and government entities. We may also share selected information with any entity related to Charles Schwab Singapore (including, but not limited to, Charles Schwab & Co., Inc. and all other related corporations and subsidiaries of the foregoing corporations) and between each of them and with third parties that send marketing/promotional communications to their own lists on our behalf to our customers who have elected to receive such communications. Also, in some cases, we share information to retain a service to contact opt-in customers on our behalf to perform analyses of your satisfaction with Charles Schwab Singapore.

We may also share limited demographic and non-personally identifiable information with third parties to assist us with business and marketing analysis. Again, these third parties agree to keep the information confidential.

Additionally, we occasionally invite our customers to participate in offers that require them to share their contact information with outside firms. We also may purchase or receive non-customers lists, but we do not redistribute such lists.

For the avoidance of doubt, the above information is without prejudice to any other rights of disclosure we may have pursuant to any other agreement with you (including, but not limited to, the Schwab One® Singapore Account Terms and Conditions) and any other rights of disclosure we may have pursuant to applicable laws and regulations.

### **Complaints Process**

As indicated under the Schwab One® Singapore Account Terms and Conditions, if you have any complaint regarding how we are handling your personal data, you may refer your complaint to the data protection officer of Charles Schwab Singapore by writing to him at 1 George Street, #07-01A, Singapore 049145 or by calling +65-6536-3922. Charles Schwab Singapore will investigate the complaint and report back to you on the findings and the resolution to the complaint.

### **Security**

Schwab uses a number of methods to protect your information. When you submit sensitive information via our website, your information is encrypted (look for the padlock icon on your browser to verify security). We invest in security technology and aim to ensure that our processes meet or exceed industry standards. Your information is transmitted on the secured portion of our website.

We use firewalls and Secure Sockets Layer (SSL) technology, among other methods, to prevent unauthorized access to your account information.

Moreover, when you provide your login ID and password to access customer-only areas, that information is encrypted during transmission. Remember, you should never share your password with anyone and you should change your password frequently. You can safely change your password online at any time by answering certain questions about yourself or requesting a temporary password and changing your password upon logging in.

We also take steps to protect your offline information. Only employees and third-party service providers who need the information to perform their responsibilities are granted access to your information.

Furthermore, all employees are kept up to date on our security and privacy practices, and our service providers are contractually obligated to keep information confidential.

Schwab has a collection of security measures designed to keep your personal and financial information safe online. For more details on such security measures, including how we use cookies on our site, you can review our website.

### **Accuracy of Personal Data**

Keeping your data and information accurate and updated is very important to us. You can help us keep accurate records by informing us of any changes. If you have reasons to believe that your records or any other personal data or contact information with us are inaccurate, incomplete or not updated, please let us know per the procedures set out under “Requesting Access to/Correction of/Updating of Personal Information” above. Personal data submitted during the account opening process will also be checked to ensure accuracy.

### **Retention of Personal Data**

Your personal data is retained as long as the purpose(s) for which it was collected remains and until it is no longer necessary for any other legal or business purposes.

### **Transfer of Personal Data**

Charles Schwab Singapore has or will enter into a legally binding contract with overseas recipients of your personal data, to ensure that overseas recipients provide to your transferred personal data a standard of protection that is at least comparable to the protection under the Personal Data Protection Act 2012 of Singapore.

### **Email Address**

Maintaining an email address is mandatory, even if you choose to no longer receive “offers and announcements” or other educational or marketing announcements from us. In order to conduct business with you and comply with Singapore and U.S. regulatory guidelines, it is crucial that we maintain the ability to provide you with legal notices and trade-related information.

### **Links**

The Charles Schwab Singapore website contains links to other websites. Please be aware that we are not responsible for the privacy or security practices of other websites. We encourage our users to be aware when they leave our website and to read the privacy statements of each and every website that collects personal information. We also encourage our users to review the privacy statements of our service providers, available on their websites.

### **Notification of Changes**

The most recent version of our privacy policy is available on our website. Please refer to it and stay informed about the information we collect, how we use it, and when and why we may disclose it.