

## Privacy Notice

This Privacy Notice sets out the basis on which **Hotung Investment Holdings Limited (the “Company”)** and its subsidiaries (collectively, the “Group”) may collect, use, hold, disclose, or otherwise manage personal information in accordance with the **Singapore Personal Data Protection Act (“PDPA”)** and the **Personal Information Protection Act 2016 (as amended) of Bermuda (“PIPA”)**. This Privacy Notice applies to personal information in our possession or under our control, including personal data in the possession of organizations we have engaged to collect, use, disclose, or process personal data for our purposes.

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### 1. Personal Information

"Personal Information" refers to any information, whether accurate or not, about an individual who can be identified or is identifiable (a) from that information, or (b) from that information and other data to which we have or are likely to have access, including information in our records that may be updated from time to time.

#### Examples of Personal Information we may collect:

- **Identity Information:** Full name, date of birth, gender, passport or ID numbers, nationality, and photograph.
- **Contact Information:** Phone number, mailing address, email address, and emergency contact details.
- **Financial Information:** Shareholding details, securities account numbers, transaction records, tax identification numbers, and payment details.
- **Technical Information:** IP addresses, device identifiers, browser type, operating systems, and website usage data.
- **Compliance and Legal Information:** Records of consents, audit logs, regulatory filings, and government-issued identifiers.
- **Employment and Professional Information:** Job titles, employment

records, professional qualifications, and affiliations.

- **Preferences and Views:** Personal preferences, feedback, and opinions.
- **Transaction-Related Information:** Information regarding transactions or interactions with us.
- **Other Information:** Any additional information related to you and/or any other person(s) that you provide during your interactions with us.

It should be noted that the examples listed above are not exhaustive.

If you provide us with any Personal Information about a third party (including, but not limited to, your spouse, children, parents, proxies, nominees, corporate representatives, any individuals who may be beneficial owners, and/or employees), by submitting such information to us, you represent to us that you have obtained the consent of the third party to provide us with their Personal Information for the intended purposes.

We may collect this information directly, from publicly or commercially available sources, or from third parties where lawful and as we may deem appropriate.

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## **2. Collection, Use, and Disclosure of Personal Information**

### **Purpose of Use**

We may collect, use, or disclose Personal Information for the following lawful purposes:

1. **Shareholder Management:** Maintaining shareholder registers, facilitating voting, dividend payments, and general administrative functions.
2. **Compliance and Legal Obligations:** Fulfilling statutory and regulatory obligations under applicable laws and regulations, including but not limited to any applicable company, securities, taxation, and data protection laws, regulations, rules or guidelines, and maintaining any registers required by applicable laws or regulations.
3. **Identity Verification:** Ensuring the identity of shareholders or their proxies,

nominees, corporate representatives or beneficial owners.

4. **Communication:** Responding to inquiries, shareholder communications, and company updates.
5. **Marketing and Communication Activities:** Conducting marketing activities, including social media posts, videos, and promotional materials.
6. **Business Operations:** Conducting internal audits, risk management, compliance monitoring, and data hosting.
7. **Litigation and Dispute Resolution:** Facilitating legal proceedings, obtaining legal advice, and defending legal claims.
8. **Analysis and Reporting:** Analyzing shareholder data and preparing reports.
9. **Administrative Purposes:** For administrative, payment processing, redemption, data processing, hosting, storing, or backing up Personal Information on third-party servers or data clouds or the provision of any services by the Group or in connection with the Group's business.

We may continue to retain and process your Personal Information for a reasonable period even after your relationship with us or the transaction has ended, to fulfill our legal obligations or business purposes.

### **Disclosure of Personal Information**

We may disclose your Personal Information:

- To **group companies, affiliates, and subsidiaries.**
- To **any service providers, agents, and other organizations** engaged to perform any of the functions related to any of the purposes mentioned above.
- To **any auditors and professional advisers of the Company or any of our group companies.**
- To **any official, governmental or regulatory authorities or other persons,** as required by law, regulations and/or a court order or if requested by any governmental or regulatory authority.

Your Personal Information may be transferred or disclosed to any assignee or transferee of all or any substantial part of the Group's business.

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### **3. Withdrawing Your Consent**

The consent you provide for the collection, use, and disclosure of your Personal Information will remain valid until withdrawn by you in writing. You may withdraw your consent and request us to stop collecting, using, and/or disclosing your Personal Information for any or all the purposes listed above by submitting your request in writing or via email to our **Data Protection and Privacy Officer** at the contact details provided below.

Upon receiving your written request to withdraw consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) to process your request and notify you of the consequences of acceding to the same. This may include legal consequences affecting your rights and liabilities to us.

Please note that withdrawing consent does not affect our right to continue collecting, using, and disclosing Personal Information where such collection, use, and disclosure without consent is permitted or where such collection, use, and disclosure is required under applicable laws, regulations, rules, guidelines and/or a court order or if requested or required by any governmental or regulatory authority.

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### **4. Protection and Retention of Personal Information**

We implement reasonable administrative, physical, and technical measures to safeguard your Personal Information from unauthorized access, disclosure, or misuse. These measures include limiting access to Personal Information on a need-to-know basis and encrypting sensitive data where applicable.

We generally rely on Personal Information provided by you (or your authorized representative) and may retain your Personal Information for as long as necessary to fulfill the purposes for which it was collected, or as required or permitted by

applicable laws. When Personal Information is no longer necessary, we will remove or anonymize it where practicable.

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## 5. Rights of Individuals

Under PDPA and PIPA, you have the following rights concerning your Personal Information:

- **Access:** Request a copy of the Personal Information we hold about you.
- **Correction:** Request updates or corrections to your Personal Information which is inaccurate.
- **Withdrawal of Consent:** Withdraw consent to the use of your Personal Information for specific processing activities or for advertising or marketing purposes.
- Request that some or all of your Personal Information be erased or destroyed where that Personal Information is no longer relevant for the purpose of its use.

To exercise your rights, please contact our **Data Protection and Privacy Officer** at the contact details below.

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## 6. Accuracy of Personal Information

You should ensure that all Personal Information submitted to us is complete, accurate, and true. Failure to provide accurate information may affect our ability to fulfill your requests or process your transactions efficiently.

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## 7. Updates to Privacy Notice

We are committed to regularly reviewing and updating our policies to reflect changes in market and legal requirements. The Company reserves the right to amend this Privacy Notice from time to time without prior notice to you. Any updates to this Privacy Notice will be communicated through our official channels.

Please check our website periodically at [www.hihl.com.sg](http://www.hihl.com.sg) to see if any changes have been made.

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## **8. Contacting Us**

For questions, updates, or requests regarding this Privacy Notice or your Personal Information or for access to, correction or erasure of your Personal Information, please contact:

### **Data Protection and Privacy Officer**

Name: Yu-Chieh Chen

Email: [privacy@equity.com.tw](mailto:privacy@equity.com.tw)