

## **CROSSINVEST (ASIA) PTE LTD.**

### **The EU General Data Protection Regulation (GDPR)**

The GDPR is a new legal framework from the EU that takes effect on May 25, 2018.

This law is designed to accomplish two main things:

- i. Unify the current data protection privacy laws throughout the EU, and
- ii. Enhance the rights of citizens of the EU to protect their personal information

#### **REGULATIONS**

- i. This Regulation lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data.
- ii. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.
- iii. The free movement of personal data within the Union shall be neither restricted nor prohibited for reasons connected with the protection of natural persons with regard to the processing of personal data.

#### **POLICY**

Crossinvest (“The Company”) is committed to processing data in accordance with its responsibilities under GDPR and protecting the rights and freedoms of data subjects; safely and securely processing your data in accordance with all of our legal obligations.

We hold personal data about our clients, employees, our partners and other individuals for a variety of business purposes. We are committed to protecting all personal information. The greater control over how personal information is used, that the GDPR strives to provide, is provided for under our personal data protection policies Singapore Personal Data Protection Act.

#### **DATA PROTECTION PRINCIPLES**

Article 5 of the GDPR requires that personal data shall be:

- i. processed lawfully, fairly and in a transparent manner in relation to individuals;
- ii. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- iii. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- iv. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal

- v. data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- vi. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- vii. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

### **DATA MINIMISATION**

We have, when collecting personal data, ensured that all data collected is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

### **ACCURACY**

- i. We take reasonable steps, at all times, to ensure personal data is accurate.
- ii. Where necessary for the lawful basis on which data is processed, steps are always taken to ensure that personal data is kept up to date.

### **ARCHIVING/REMOVAL**

- i. To ensure that personal data is kept for no longer than required or necessary, we have in place an archiving policy within the company.
- ii. Our archiving policy states what data should/must be retained, for how long, and why.

### **SECURITY**

- i. We always ensure that personal data is encrypted and securely stored and that it is kept-up-to-date.
- ii. Access to personal data is limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
- iii. All personal data collected is deleted where appropriate and is done so safely such that the data is irrecoverable.
- iv. Appropriate back-up and disaster recovery solutions are in place.

## **Queries, Access/Correction Requests and Withdrawal of Consent**

If you have any queries, or you wish to access and/or correct your personal data, or you wish to withdraw your consent to our collection, use or disclosure of your personal data, please contact your Relationship Manager or submit a written request (with supporting documents, if any) to our Compliance Officer at:

Crossinvest (Asia) Pte. Ltd.  
82 Telok Ayer Street, #02-02  
Singapore 048467

Our Compliance Officer shall strive to respond to you within 30 days of your submission.

Please note that if you withdraw your consent to any or all use or disclosure of your personal data, depending on the nature of your request, we may not be in a position to continue to provide our services or products to you or administer any contractual relationship in place. Such withdrawal may result in the termination of any agreement you may have with us. All our rights are reserved in such event.

THE ABOVE GUIDELINE IS IN COMPLIANCE WITH THE EU REGULATIONS AND THE SINGAPORE DATA PROTECTION ACT

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN>

This Notice is effective from 25 MAY 2018