



## Privacy Notice

This Privacy Notice is provided to you in relation to your personal data/information under, the Personal Data (Privacy) Ordinance (Cap. 486) of Hong Kong (**PDPO**), the *Privacy Act 1988* (Cth) of Australia (**Privacy Act**) or the General Data Protection Regulation of the European Union (**GDPR**), (the PDPO, the Privacy Act and the GDPR together being the **Privacy Laws**), i.e., information relating directly or indirectly to a living individual from whom it is practicable for the identity of the individual to be directly or indirectly ascertained and in a form in which access to or processing of data is practicable, or any information relating to an identified or identifiable natural person (an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier including, but not limited to: a name (First Name, Last Name, Alias), an identification number (including, but not limited to, Passport number, Employee Number or Driving License Number), an online identifier, location data (home or work addresses), contact information (telephone numbers, email addresses), photographs and biometric data, one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person)) provided to us in accordance with the requirements of the relevant Privacy Laws.

In this Privacy Notice, personal data refers to personal information under the Privacy Act, and personal data under the PDPO and GDPR, as the case may be.

### 1. Purpose under the GDPR

For the purposes of the GDPR, we are a data controller in respect of your personal data to the extent that you are an EU resident. We are responsible for ensuring that we use your personal data in compliance with GDPR.

We are registered in Hong Kong and our registered address is at 14-15/F., K11 Atelier, 18 Salisbury Road, Tsim Sha Tsui, Kowloon, Hong Kong and our company number is 671034.

Without limiting the generality of this Privacy Notice, this Privacy Notice also applies if we process personal data of contractors, market participants and clients to the extent that they are EU residents. In this regard, this Privacy Notice sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this Privacy Notice.

### 2. Types of Personal Data Collected

The personal data about you that we typically collect and process includes (but is not limited to):

- Contact details (including address, telephone numbers, email addresses);
- Individual names;
- Personal identifiers (including tax codes, national identification references, bank account details and passport numbers);
- Photographs;
- Information about our business relationship with you;
- Professional information (including job title, role, department);
- Communication preferences (including preferred language);
- Vendor contact and sub-contractor details; or
- Data subject details associated with the author or modifier of electronic records.

### 3. Disclosure Obligation

Unless otherwise stated, you must supply personal data requested by us in connection with the opening or continuation of accounts with us, the provision of services or products by us, or the use of our website, and (where applicable) one or more of our group companies. If you do not supply this data or subsequently withdraw your consent provided to us in relation to the use, retention, transfer and handling of your personal data, it will not be possible for us or them to open or maintain such account(s) or provide services or products to you or companies related to you or to process an employment application (as the case may be) as we or they may not have sufficient information to do so.

### 4. Use of Personal Data

#### 4.1. User

All personal data (whether provided by you or any other person, and whether provided before or after the date you receive this notice) may be provided to, exchanged with or transferred to, any of the following entities or persons as we may consider necessary whether or not they are in or outside Hong Kong (each, a "User"):

- (a) Mizuho Securities Asia Limited ("we" or "us") or any entity directly or indirectly controlled by us, any entity that directly or indirectly controls us, or any entity directly or indirectly under common control with us (together "Mizuho Financial Group") or our or their branches or offices;
- (b) any director, officer, employee or representative of the Mizuho Financial Group only when carrying out the business of the Mizuho Financial Group;

- (c) any agent, contractor, vendor, market participants or third party service provider who provides employment, administrative, telecommunications, computer, payment, or securities clearing, nominee, custodian or other services, to any Mizuho Financial Group company;
- (d) any person who owes a duty of confidentiality to us or who has undertaken to keep such information confidential;
- (e) any financial institutions with which you have or propose to have dealings;
- (f) where data is collected by a Mizuho Financial Group company as agent of any other person or for forwarding to or otherwise for the purpose of making any application or request to any other person for any facility or service, any such person who may not be in Hong Kong and may not be subject to the Privacy Laws and not restricted in the use of the data;
- (g) any trustee, registrar or custodian of any relevant unit trust or other collective investment scheme or any insurance company in connection with any service provided or to be provided by the Mizuho Financial Group or any centralized securities depository or registrar of products held in respect of any of your accounts;
- (h) credit reference agencies and, in the event of default, debt collection agencies;
- (i) any person to whom we transfer or assign or, propose to transfer or assign, our interests and/or obligations in respect of any of the accounts with us or any services provided by us;
- (j) if we are acquired by a third party, in which case personal data held by us about you will be disclosed to the third party buyer(s) and their advisers; or
- (k) any other third parties:
  - (i) as are necessary to provide any of the services
  - (ii) where required by law, regulation, court order or request from any governmental or regulatory body;
  - (iii) where the information is already in the public domain (otherwise than as a result of a breach of our obligations hereunder); or
  - (iv) where requested or permitted by you.

#### 4.2. Purposes

All personal data (whether provided by you or any other person, and whether provided before or after the date you receive this notice) may be used, stored and processed by any User for one or more of the following purposes:

- (a) allowing us to provide services to you;
- (b) contacting you as part of the conduct of normal business;
- (c) new or existing client verification;
- (d) ongoing account administration and maintenance;
- (e) developing financial services or related products for clients;
- (f) marketing (including direct marketing in accordance with paragraph 5 below) of financial services or related products;
- (g) providing you with information concerning our or the Mizuho Financial Group's businesses as well as information concerning any investment opportunities;
- (h) processing employment applications and, if this results in any employment with us, all aspects of our human resources functions;
- (i) transfer of such data to any place inside or outside Hong Kong whether for the processing, holding or use of such data inside or outside Hong Kong;
- (j) matching your personal data (irrespective of the purposes and sources for which such data were collected, and whether collected by a User or any other person);
- (k) data verification or exchange;
- (l) ensuring the ongoing credit worthiness of clients;
- (m) any purpose relating to or in connection with requirements to make disclosure under any law binding us or any other Mizuho Financial Group company under and for the purposes of compliance with any law, regulation, court order or order of a regulatory body;
- (n) enabling any of our actual or proposed transferees or assignees of our rights in respect of your account to evaluate the transaction intended to be the subject of the transfer or assignment;
- (o) conducting credit checks or assisting other institutions to conduct credit checks;
- (p) collecting debts, or assisting other institutions (including any Mizuho Financial Group company) to collect debts, from clients and those providing security for any clients' obligations; or producing or verifying data which may be used for the purpose of taking such action that a User or any other person may consider appropriate (including action that may relate to the rights, obligations or interest of you or any other person);
- (q) in connection with any system or facility for payment or communication by electronic means which we or any other Mizuho Financial Group company participates;
- (r) backup retention and management supporting business continuity;
- (s) providing an audit trail relating to the conduct of normal business;
- (t) for operation and maintenance purposes, IT applications and infrastructure; or
- (u) any other purpose relating to or in connection with the any of the above, any business or dealings of the Mizuho Financial Group or which a client may from time to time agree.

Your personal data is retained, used, stored or processed only for so long as required for the purposes for which it was collected, as necessary to comply with any applicable legal and regulatory requirements, for us to establish, exercise or defend our legal

rights or for the purpose of legal proceedings, or for our legitimate business interest (or the legitimate interests of one or more of our affiliates).

## **5. Use of Personal Data in Direct Marketing**

In addition to the purposes set out above, we intend to use your personal data (including but not limited to your name, contact details, products and services portfolio information, financial and investment experience and background and risk profile) for sending you promotional materials (such as information relating to our products and services) and/or contacting you in relation to our products and services. However, we cannot use your personal data without your consent.

If you do not agree to such use of your personal data in direct marketing, please indicate your objection by checking the appropriate box in the account opening and onboarding documents. By proceeding with the account opening and onboarding process without checking the box, you confirm your agreement to use of your personal data in direct marketing.

You may in the future withdraw your consent to use of your personal data by us for direct marketing purposes and we shall cease using your personal data without charge after receipt of your request. You shall inform us of your wish to withdraw your consent by using the contact information specified under the heading "Contact Person" below.

## **6. Transfer of Personal Data to a Third Country**

The personal data that we collect from you may be transferred to, and stored at, a destination outside the country or region that you are in, such as Australia, Hong Kong, Japan or South Korea, as the case may be. It may also be processed by staff operating outside of the country or region that you are in, such as Australia, Hong Kong, Japan or South Korea, as the case may be.

Where we transfer your personal data outside the country or region that you are in, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the country or region that you are in. This can be done in a number of ways, for instance:

- the country that we send your personal data to might be approved by the relevant authorities;
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the country or region that you are in. In all cases, however, we will ensure that any transfer of your personal data is compliant with the relevant data protection law.

## **7. Technical and Organization Security Measures**

We implement a variety of security measures to maintain the safety of your personal data stored with us.

We hold your personal data in paper-based and electronic files. We seek to ensure that your personal data which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Only authorised personnel have access to your details through our systems. Your information is treated with respect and only accessed when necessary. We require third parties handling personal data on our behalf to follow equally compliant standards of security and confidentiality.

When we no longer require your personal data (including when we are no longer required by law to keep records relating to you), we take reasonable steps to have it destroyed or de-identified.

Where your information is collected via our website or websites of our vendors, we use, and will ensure our vendors use, a secure server.

## **8. Retention Time**

Personal data is kept for the time necessary to provide the services to the User or to fulfil legal, contractual or ongoing business interests. Once the purpose for processing the personal data has been discharged we shall keep such personal data no longer than is necessary, subject to any laws or regulations that may set a minimum period for which we have to keep your personal data.

## **9. Rights of Access and Correction**

You have the right to have access to and correction of your personal data under the applicable Privacy Laws. In general, and subject to certain exemptions and the applicability of the Privacy Laws, you are entitled to:

- (a) enquire whether we hold personal data in relation to you;
- (b) request a copy of any such personal data;
- (c) receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible;
- (d) request the correction of your personal data which is inaccurate or incomplete;
- (e) be given reasons if a request for access or correction is refused;
- (f) ascertain our policies and practices in relation to personal data and to be informed of the kind of personal data held by us;

- (g) in relation to customer credit, request to be informed which items of personal data are routinely disclosed to credit reference agencies or debt collection agencies, and be provided with further information to enable the making of an access and correction request to the relevant credit reference agency or debt collection agency;
- (h) in relation to any personal data which has been provided by us to a credit reference agency, to instruct us upon termination of an account by full repayment to make a request to the credit reference agency to delete such data from its database, as long as the instruction is given within five years of termination and at no time did the account have a default of payment lasting in excess of 60 days within 5 years immediately before account termination. In the event the account has had a default of payment lasting in excess of 60 days the data may be retained by the credit reference agency until the expiry of five years from the date of final settlement of the amount in default or five years from the date of discharge from a bankruptcy as notified to us, whichever is earlier;
- (i) request that we erase your personal data;
- (j) object to, and request us to restrict our processing of your personal data;
- (k) lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by us; and
- (l) where we have obtained a credit report on you from a credit reference agency in considering any application for credit, to be given the contact details of the relevant credit reference agency.

## 10. Feedback and complaints

You can tell us about any concerns on how your personal data has been handled (including any concerns that it may not have been handled in accordance with our obligations under the Privacy Laws) by using the contact details below under the heading "Contact Person".

Following a complaint, we will commence an investigation into your complaint. You may be informed of the outcome of your complaint following completion of the investigation. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or impact on the commercial arrangements between you and us.

If you're not satisfied with our response after you've been through our internal complaints process, you may make a complaint to the Hong Kong Privacy Commissioner for Personal Data or Australian Information Commissioner if your complaint is about your privacy.

### Office of the Hong Kong Privacy Commissioner for Personal Data

Visit: [pcpd.org.hk](http://pcpd.org.hk)

Email: [complaints@pcpd.org.hk](mailto:complaints@pcpd.org.hk)

Mail: Room 1303, 13/F, Dah Sing Financial Centre, 248 Queen's Road East, Wanchai, Hong Kong

### Office of the Australian Information Commissioner

Visit: [oaic.gov.au](http://oaic.gov.au)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Mail: GPO Box 5288, Sydney NSW 2001

## 11. Contact Person

If you wish to request access to and/or correction of personal data concerning you or for information regarding policies, practices of and the kind of personal data held by us, you should address your request in writing to us as follows:

### **Mizuho Securities Asia Limited**

**14-15/F., K11 Atelier**

**18 Salisbury Road**

**Tsim Sha Tsui, Kowloon**

**Hong Kong**

**Attention: Compliance (Re: Personal Data Privacy)**

In accordance with the terms of the PDPO, we have the right to charge a reasonable fee for the processing of any data access request. Nothing in this notice shall limit your rights under the PDPO.

## 12. Changes to this Privacy Notice

We reserve the right to make written changes to this Privacy Notice at any time. If we make any changes, it will notify you.



**Mizuho Securities (Singapore) Pte. Ltd.**

**Data Protection Notice**

**(June 2024)**

## Contents

1.	Introduction .....	2
2.	Personal Data .....	2
3.	Collection and Use of Personal Data.....	4
4.	Disclosure of Personal Data to Third Parties .....	7
5.	Withdrawing Consent .....	8
6.	Access to and Correction of Personal Data .....	9
7.	Protection of Personal Data .....	9
8.	Accuracy of Personal Data.....	10
9.	Retention of Personal Data .....	10
10.	Transfers of Personal Data out of Singapore .....	10
11.	Data Protection Officer .....	11

## 1. Introduction

Mizuho Securities (Singapore) Pte. Ltd. (“**MHSS**”, “**we**”, “**us**”, or “**our**”) takes the protection of personal data seriously. We recognize that as a customer, employee, job applicant, vendor or contractor, you have provided your personal data to us with the utmost confidence that we will protect it. Where your personal data is in our possession or control, it is our responsibility to properly use, manage, protect and process your personal data.

This Data Protection Notice (“**Notice**”) sets out the basis on which MHSS may collect, use, disclose or otherwise process personal data of our customers, employees, job applicants, vendors, contractors and other individuals, in accordance with the Personal Data Protection Act 2012 (the “**PDPA**”) and the Personal Data Protection Regulations 2021, as amended from time to time. Please take time to read and understand this Notice.

### **APPLICABILITY OF THIS NOTICE**

This Notice applies to –

- ❖ Customers, employees, job applicants and any other persons, including third party vendors, contractors or individuals from whom MHSS collects personal data; and
- ❖ All personal data in our possession and under our control, including personal data in the possession of organizations which we have engaged to collect, use or process personal data for our purposes.

#### **Effect of this Notice**

This Notice supplements but does not supersede nor replace any other consents which you may have previously provided to MHSS in respect of your personal data, and your consents therein are in addition to any rights which we may have at law to collect, use or disclose your personal data.

For the avoidance of doubt, this Notice applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Notice from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Notice was last updated.

## 2. Personal Data

### 2.1 As used in this Notice:

“**business contact information**” refers to an individual’s name, position name or title, business telephone number, business address, business electronic mail address or business fax number and any other similar information about the individual, not provided by the individual solely for his or her personal purposes;

“**customer**” means an individual, corporate, institution or entity (a) with whom we establish or intend to establish business relations; or (b) for whom we undertake or intend to undertake any transaction without an account being opened. For the purposes of this Notice, “**business**

**relations**” means (i) the opening or maintenance of an account with us; (ii) instructing us or entering into a transaction with us; or (ii) the provision of financial advice by us;

**“customer connected individuals”** means individuals connected to a customer including but not limited to authorized signatories, beneficial owners, directors, officers, employees or staff members, investors, control persons, account signatories, guarantors, security providers or obligors.

**“employee”** means all persons engaged in a contract of service with us (whether on a part-time, temporary or full-time basis) as well as interns, secondees and trainees working at, seconded or attached to us, and all references to **“employment”** shall apply equally to internships, secondments and traineeships (as may be applicable);

**“job applicant”** means any person who has applied for a position with us; and

**“personal data”** means data, whether true or not, about a customer who can be identified: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

- 2.2** Depending on the nature of your interaction with us, some examples of personal data which we may collect from you include, without limitation:

<b>Customer or customer connected individuals</b>	Full name (including any aliases), unique identification numbers such as NRIC, FIN, birth certificate or passport, residential address, email address, telephone number, nationality, date and place of birth, marital status, employment information, proof of identification, specimen signature.
<b>job applicant</b>	Mailing address, telephone number, email address and other contact details, resume, educational qualifications, professional qualifications, certifications, employment references, employment and training history, salary information and bank account details, details of next-of-kin/spouse/other family members and photographs.
<b>employee</b>	Name or alias, gender, NRIC/FIN, passport, date of birth, nationality, country/city of birth, mailing address, telephone numbers, email address, employment and training history, salary information and bank account details, details of your next-of-kin/spouse/other family members, records on leave of absence from work, photographs, performance assessments and disciplinary records.
<b>others, including vendors, contractors and other individuals</b>	Full name (including any aliases), unique identification numbers such as NRIC, FIN or passport, residential address, email address, telephone number, nationality, date of birth, employment information.



- 2.3 The data protection provisions in the PDPA do not apply to business contact information.
- 2.4 Other terms used in this Notice shall have the meanings given to them in the PDPA (where the context so permits).

### 3. Collection and Use of Personal Data

#### CUSTOMERS

- 3.1 Where you are a customer, we generally do not collect your personal data or personal data of your customer connected individuals unless –
- (a) Voluntary / Written Consent – It is provided to us voluntarily by you directly or via a third party who has been duly authorized by you to disclose your personal data to us (your “**authorized representative**”) after being notified of the purposes for which the personal data is collected; and (ii) you (or your authorized representative) have provided written consent to the collection and usage of your personal data for those purposes; or
  - (b) Permitted by Law – Collection and use of personal data without consent is permitted or required by the PDPA or other laws.

We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorized by law).

**By entering into any agreements with us, voluntarily submitting personal data to us, instructing us or entering into a transaction with us or applying for products or services offered by us, you agree and consent to MHSS (including Mizuho Group Affiliates (defined below)) as well as our respective agents, authorized service providers and relevant third parties collecting, using and disclosing your personal data in accordance with this Notice.**

#### Avenues of Collection

- 3.2 MHSS may collect personal data from customers in the following ways:
- (i) when you submit application forms, questionnaires or other forms to us;
  - (ii) when you submit queries, requests, complaints or feedback to us;
  - (iii) when you use or sign up for any MHSS’s services;
  - (iv) when you interact with our staff, which may include customer service officers, relationship managers and other representatives, through telephone calls, letters, meetings and emails;
  - (v) when your images are captured by us in the form of photographs or videos, including, without limitation, via our CCTV cameras while you are on our premises or when you attend our events;
  - (vi) when you request that we contact you, and when you respond to our marketing representatives, agents and other service providers;
  - (vii) when you request to be included in an email or other mailing list;

- (viii) when we receive your personal data from business partners, public agencies, your employer or previous employer and other third parties in connection with your relationship with us; and
- (ix) when you submit your personal data to us for any other reasons.

### **Purposes**

- 3.3** We may collect and use your personal data for any or all of the following purposes, and we may disclose your personal data to third parties, where necessary, for the following purposes –
- 3.3.1** Performing obligations in the course of, or in connection with, our provision of the services requested by you;
  - 3.3.2** Verifying your identity or information contained in the customer application form or other onboarding document, in order to conduct customer due diligence (whether prior to establishing business relations, for ongoing monitoring or otherwise) to such standards as MHSS is required to observe under applicable laws and regulations;
  - 3.3.3** Account opening and ongoing account administration and maintenance (including credit worthiness), and managing your relationship with us;
  - 3.3.4** Marketing (including direct marketing) of financial services or related products, with your consent where provided;
  - 3.3.5** Financial reporting, regulatory reporting, management reporting, risk management (including monitoring credit exposures), audit and record keeping purposes;
  - 3.3.6** Seeking professional advice, including without limitation, legal or tax advice;
  - 3.3.7** Complying with applicable laws, regulations, codes of practice, guidelines, or rules applicable to the Mizuho Group Affiliates (defined below), or to assist in law enforcement and investigations conducted by any governmental and/or regulatory authority;
  - 3.3.8** Collecting debts, or where applicable, assisting other institutions (including any Mizuho Group Affiliates (defined below)) to collect debts from customers and those providing security for any customers' obligations;
  - 3.3.9** In connection with any system or facility for payment or communication by electronic means which MHSS or any other Mizuho Group Affiliates (defined below) participates;
  - 3.3.10** Responding to, handling and processing queries, requests, applications, complaints and feedback from you; and
  - 3.3.11** Any other purpose relating to or in connection with any of the above, any business or dealings of the Mizuho Group Affiliates (defined below) or for any purpose, which MHSS and you may from time to time agree.
- 3.4** The purposes listed above may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, a period to enable us to enforce our rights under a contract with you).

- 3.5** In providing services to you, we may receive personal data about a range of customer connected individuals. We may receive this personal data directly from you or from other entities such as your agents or related corporations.
- 3.6** Where you provide us with any personal data relating to a third party or your customer connected individual, by submitting such information to us, you represent and warrant to us that you have obtained the consent of that third party or customer connected individual for the provision of their personal data for the purposes set out in this Notice.

### **EMPLOYEES & JOB APPLICANTS**

- 3.7** Where you are an employee or job applicant, we generally do not collect your personal data unless –
- (a) Voluntary / Written Consent – You knowingly and voluntarily provide in the course of, or in connection with, your employment or job application with us, or via your authorized representative (which may include your job placement agent) after (i) being notified of the purposes for which the data is collected; and (ii) you (or your authorized representative) have provided written consent to the collection and usage of your personal data for those purposes; or
  - (b) Permitted by Law – Collection and use of personal data without consent is permitted or required by the PDPA or other laws.

We shall seek your consent before collecting any additional personal data and before using your personal data for a purpose which has not been notified to you (except where permitted or authorized by law).

### **Purposes/Disclosure for Employees**

- 3.8** We may collect and use your personal data for any or all of the following purposes, and we may disclose your personal data to third parties, where necessary, for the following purposes –
- 3.8.1** Performing obligations under or in connection with your contract of employment with us, including, without limitation, payment of remuneration and tax;
  - 3.8.2** All administrative and human resources related matters within our organization, including administering payroll, granting access to our premises and computer systems, processing leave applications, administering your insurance and other benefits, processing your claims and expenses, investigating any acts of default (or suspected acts of default) and developing human resource policies;
  - 3.8.3** Conducting rigorous due diligence checks (whether independent or otherwise) to ensure fitness and propriety; and
  - 3.8.4** Managing and terminating our employment relationship with you, including monitoring your internet access and use of our intranet email to investigate any potential or actual contravention of our internal policies and procedures, applicable laws and regulations and resolving any employment-related grievances.

### **Purposes/Disclosure for Job Applicants**

- 3.9** We may collect and use your personal data for any or all of the following purposes, and we may disclose your personal data to third parties, where necessary, for the following purposes –
- 3.9.1** Assessing and evaluating your suitability for employment in any current or prospective position within MHSS or any Mizuho Group Affiliates (defined below);
  - 3.9.2** Verifying your identity and the accuracy of your personal details and other information provided; and
  - 3.9.3** Conducting rigorous due diligence checks (whether independent or otherwise) to ensure fitness and propriety.
- 3.10** The purposes listed above may continue to apply even in situations where your relationship with us has been terminated or altered in any way, for a reasonable period thereafter (including, where applicable, to satisfy record retention requirements).

## **4. Disclosure of Personal Data to Third Parties**

- 4.1** Your personal data in our possession will be kept confidential, and will only be used or disclosed to our directors, employees, officers and agents on a strictly need-to-know basis in order for them to fulfil the purposes detailed in Section 3.
- 4.2** However, in order to provide you with effective and continuous services, and to perform our obligations in connection with our provision of services or for the purposes listed in Section 3, we may disclose your personal data to the following third parties as MHSS may consider necessary, whether located in Singapore or elsewhere:
- 4.2.1 *Affiliates*** – As part of the Mizuho Financial Group, MHSS works closely with its affiliates in the Mizuho Financial Group, including but not limited to Mizuho Securities Co., Ltd, Mizuho Securities Asia Limited, Mizuho Securities USA LLC, Mizuho International Plc and Mizuho Bank, Ltd. (collectively, referred to as “**Mizuho Group Affiliates**”), in operating its businesses.
  - 4.2.2 *Third Party Service Providers*** – MHSS may outsource (in whole or in part) the performance of certain functions or the provision of certain services to agents, contractors or third party providers or other organizations, which we have engaged to perform any functions, pursuant to contractual arrangements. These include, without limitation, courier services, employment, administrative, telecommunications, information technology, payment, payroll, processing, training, market research, storage, archival, securities clearing, nominee, custodian or other services.
  - 4.2.3 *Financial Institutions*** – Any financial institutions or business partners (including brokers) with which MHSS customers have or propose to have dealings relevant to the nature of the businesses or services, including, without limitation, any trustee, registrar or custodian of any relevant unit trust or other collective investment scheme or any insurance company in connection with any service provided or to be provided by the

Mizuho Financial Group or any centralized securities depository or registrar of products held in respect of MHSS customers.

- 4.2.4 Background Screening Agencies or Credit Reference Agencies** – Where we are required to conduct background screening on you, we will be required to disclose your personal data to screening agencies, credit reference agencies and in the event of default, debt collection agencies.
- 4.2.5 Professional Advisers** – From time to time, MHSS may need to disclose your personal data, on a strictly need-to-know basis, to professional advisers such as lawyers, auditors or tax consultants.
- 4.2.6 Regulatory bodies and Government Agencies** – Relevant regulatory bodies, government agencies, statutory boards, administrative bodies, authorities or law enforcement agencies to comply with any laws, rules, guidelines and regulations or schemes to which the Mizuho Group Affiliates may be subject, whether situated locally or overseas.
- 4.2.7 Any other relevant parties** – Any person to whom MHSS transfers or assigns or, proposes to transfer or assign, MHSS's interests and/or obligations in respect of MHSS customers, including any accounts or any services, or any other party to whom disclosure of personal data is reasonably necessary for the purpose of managing, maintaining or terminating our relationship with you, or providing you with our services.

## 5. Withdrawing Consent

- 5.1** The consent that you provide for the collection, use and disclosure of your personal data will remain valid until such time it is withdrawn in writing by you.

### Request to Withdraw Consent

- 5.2** You may withdraw consent and request MHSS to stop collecting, using and/or disclosing your personal data for any or all of the purposes listed above in Section 3 by submitting your request in writing or via email to our Data Protection Officer at the contact details provided in Section 11 below.
- 5.3** Upon receipt of 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.
- 5.4** In general, we shall seek to process your request within *thirty (30) calendar days* from receipt of the request.

### Consequences of Withdrawal

- 5.5** While we respect your decision to withdraw your consent, please note that depending on the nature, scope and extent of your request, we may not be in a position, where applicable, –

- (a) to continue providing services to you; or
- (b) to process your job application (as the case may be).

We shall, in such circumstances, notify you of the consequences of such withdrawal, including, without limitation, legal consequences which may affect your rights and liabilities to us, before completing the processing of your request.

Should you decide to cancel your withdrawal of consent, please inform us in writing in the manner described in Section 5.2 above.

- 5.6** Please note that withdrawals of consent do not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

## 6. Access to and Correction of Personal Data

- 6.1** You have a right under the PDPA to have access to your personal data in our possession and control. MHSS shall make a reasonable effort to ensure that the personal data which is collected from you is accurate and complete, in particular, if your personal data is likely to be used by us to make a decision that affects you, or is disclosed to another organization.

- 6.2** If you wish to make –

- (a) **Access Request** – an access request for access to a copy of the personal data which we hold about you or information about the ways in which we use or disclose your personal data; or
- (b) **Correction Request** – a correction request to correct or update any of your personal data which we hold about you,

you may submit your request in writing or via email to our Data Protection Officer at the contact details provided in Section 11 below.

- 6.3** Please note that, depending on the extent of the request, a reasonable fee may be charged for an access request. If so, we will inform you of the fee prior to processing your request.

- 6.4** We will respond to your request as soon as reasonably possible. In general, a response will be provided within *thirty (30) calendar days* from receipt of your request. Should we be unable to respond to your request within thirty (30) days after receiving your request, we will inform you in writing within that period of the time or date by which we will be able to respond to your request.

## 7. Protection of Personal Data

- 7.1** To safeguard your personal data from unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks, we have put in place appropriate administrative, physical and technical measures as well as reasonable security arrangements.

- 7.2** Such measures include, without limitation, antivirus protection, encryption and disclosing personal data to our employees, officers, agents and third party providers on a need-to-know basis.
- 7.3** You should be aware, however, that no method of transmission over the Internet or method of electronic storage is completely secure. While security cannot be guaranteed, we strive to protect the security of your information and are constantly reviewing and enhancing our information security measures.

## **8. Accuracy of Personal Data**

- 8.1** We generally rely on personal data provided by you (or your authorized representative).
- 8.2** In order to ensure that your personal data is current, complete and accurate, please update us if there are changes to your personal data by informing our Data Protection Officer in writing or via email at the contact details provided in Section 11 below.

## **9. Retention of Personal Data**

- 9.1** We may retain your personal data for as long as it is necessary to fulfil the purposes for which it was collected, or as required or permitted by applicable laws.
- 9.2** We will cease to retain your personal data, or remove the means by which the personal data can be associated with you, as soon as it is reasonable to assume that such retention no longer serves the purposes for which the personal data was collected, and is no longer necessary for legal or business purposes.

## **10. Transfers of Personal Data out of Singapore**

- 10.1** We generally do not transfer your personal data to countries outside of Singapore. Where we transfer your personal data to a country or territory outside Singapore, it will be on the basis that:
- (a) we have obtained your consent to do so;
  - (b) the transfer is necessary for the performance of or to enter into a contract between us;
  - (c) the transfer is necessary for the performance of a contract between us and a third party which is entered into at your request;
  - (d) the transfer is necessary for the purposes permitted under the PDPA and underlying regulation;
  - (e) such personal data is only in transit and is not being accessed, used by or disclosed, to any organization; or
  - (f) such personal data is publicly available in Singapore.

- 10.2** In the event that we need to do so, we will take all reasonable and appropriate steps to ensure that your personal data is provided with a standard of protection at least comparable to that provided under the PDPA.

## **11. Data Protection Officer**

Any requests to withdraw consent or to access, correct or update your personal data should be made in writing to MHSS's Data Protection Officer at the contact details below.

Data Protection Officer  
Mizuho Securities (Singapore) Pte. Ltd.  
Compliance Department  
E-mail: [mhss.compliance@sg.mizuho-sc.com](mailto:mhss.compliance@sg.mizuho-sc.com)  
Address: 12 Marina View, #25-02/03, Asia Square Tower 2, Singapore 018961  
Phone: +65 6603 5688