

## Privacy Policy

Manulife Investment Management (Singapore) Pte. Ltd. ("**Manulife IM (Singapore)**", "**us**", "**we**" or "**our**") is fully committed to protecting the privacy interests of individuals who provide us with information about themselves. In doing so, we instruct our staff to comply with strict internal standards of security and confidentiality. The personal data which we collect at this website comprises any or all of the following:

1. the IP address of the visitor's personal computer; the country from which the inquiry is made; the pages visited; the time at which a visit is made and the browser type; and
2. certain personal details of the visitor (these may for instance include his/her name; age; gender; profession); contact details; whether the visitor holds any funds offered or distributed by Manulife IM (Singapore) and wishes to receive information and if so, what kind of information.

Apart from any security passcode, personal data collected at the website is not electronically encrypted.

We or our third-party partners may use software tools or 'cookies' to gather information about site visitors' browsing activities. The information collected may be processed by us, our agents or any other third parties which provide services to Manulife IM (Singapore). For further details of our Cookies Policy which forms part of this Privacy Policy, please click [here](#).

If you wish to understand the list of purposes for which your personal data may be used or disclosed, you may refer to the Statement of Personal Data Protection below, which forms part of this Privacy Policy.

## Statement of Personal Data Protection

At Manulife Investment Management (Singapore) Pte. Ltd. ("**Manulife IM (Singapore)**"), we take the privacy and protection of your personal data seriously.

Manulife IM (Singapore) and those of its Representatives (as defined below) who receive your personal data comply with the Personal Data Protection Act 2012 of Singapore (the "**Act**") for the collection, use, and disclosure of your personal data. We will ensure that:

- only fair, proper and legitimate means are used to collect your personal data;
- personal data collected is used in accordance with the purpose for which personal data is collected;
- personal data collected is protected by appropriate safeguards and made available only to authorised persons; and
- you have the right to access and request correction of your personal data.

Please read this Statement of Personal Data Protection (the "**Statement**") so that you know and understand how we collect, use, and disclose your personal data.

By interacting with us, submitting information to us, signing up for any product or service offered by us, you agree and consent to Manulife IM (Singapore) and its affiliates, as well as our respective directors, officers, employees, agents and representatives ("**Representatives**", and together with us and our affiliates, referred to as "**Manulife**", "**us**", "**we**" or "**our**") collecting, using, disclosing and sharing your personal data amongst Manulife, and disclosing your personal data to Manulife's authorised service providers, contractors and business partners in the manner set forth in this Statement, including any future amendments.

In addition, this Statement will provide you with more information on the bases upon which we collect, use and/or disclose your personal data without your consent, where permitted by applicable laws.

This Statement supplements but does not supersede or replace any other consent you may have previously provided to Manulife in respect of your personal data. Your consent is additional to any rights which Manulife may have at law to collect, use or disclose your personal data.

### 1. Personal Data Protection Principles

Personal data is defined as data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which an organization has or is likely to have access. Examples of personal data will include your date of birth, health, education and employment information.

In handling your personal data, we abide by the following personal data protection principles:

#### 1.1 Notification of purpose and consent

- (a) Unless otherwise required or permitted by law, we will notify you of the purposes for which we intend to collect, use or disclose your personal data. This will occur at or before the time of the collection, use or disclosure. We limit the personal data we collect to that which is necessary for, or related to, these purposes.
- (b) Unless otherwise required or permitted by law, we will only collect, use or disclose personal data with your consent.

- (c) You may withdraw your consent for us to collect, use and disclose your personal data.

## **1.2 Access and correction**

- (a) Upon written request, we will provide you with access to your personal data and information about the ways in which your personal data may have been used or disclosed in the past year, as required or permitted by law.
- (b) You may also verify the accuracy and completeness of your personal data, and request for it be amended, where appropriate. We will respond to these requests in accordance with our personal data practices and policies and in accordance with the law.

## **1.3 Accuracy**

- (a) We will take reasonable efforts to keep your personal data accurate, complete and up to date as it is necessary to fulfil the purposes for which the data was collected and used. For this reason, you must also update us of any changes to your personal data as promptly as you can.

## **1.4 Safeguards**

- (a) We will take reasonable efforts to protect your personal data with security safeguards that are reasonable and appropriate to the sensitivity of the personal data, in order to protect it from unauthorized access, collection, use, modification, disclosure, copying or disposal, or similar risks, and the loss of any storage medium or device on which personal data is stored.
- (b) We are responsible for personal data in our possession, including information transferred to service providers who perform duties on our behalf. When we share personal data with our service providers, they must protect the shared personal data in ways that are consistent with our privacy policies and practices.

## **1.5 Retention**

- (a) Manulife IM (Singapore) complies with applicable regulatory requirements with respect to the retention of personal data.

## **1.6 Accountability**

- (a) We have designated individuals who are responsible for monitoring our ongoing compliance with the Act.
- (b) We will make information about our personal data protection policies, practices and complaint process available to you through this Statement, and upon request.

## **2. Notice to You**

### **2.1 Personal data we collect**

We may collect the following personal data (not exhaustive) from you:

- (a) General identification and contact information (title, full name, address, email address, telephone number, age, date of birth, gender, marital status, citizenship, nationality, residency status, education etc);
- (b) Identification numbers issued by government agencies (NRIC number, passport number, foreign identification number, birth certificate number, etc);
- (c) Financial information and account details such as salary and other income, assets, liabilities, spending (expenditures), credit card information (credit card number, name on credit name), bank account information (account number, statement, account details) etc;
- (d) Employment information (employment status, name of current and past employer, current and past occupation, annual declared salary etc);
- (e) Medical and health information (health status, injury or disability information, medical and procedures performed, smoking status, family medical history, etc);
- (f) Information about your investment knowledge and risk tolerance;
- (g) Tax information;
- (h) Information from cookies, IP address, type of operating system, time and duration of your visit to our Site, internet locations you came from, web pages you visit in our website, browser and device you are using, date, and number of times you visit our website, information you input into our website or similar technologies, in order to enable or enhance the functionality of our website, or to analyse visitor traffic for marketing or other purposes;
- (i) images, photographs, videos, CCTV footage, voice recordings and electronic communications;
- (j) Information relevant to the provision of financial products (insurance coverage with other insurers, claims experience, employment information, driving or criminal record, travel record, etc);
- (k) Information about family members and other persons who might be designated as beneficiaries or trustees under an insurance plan or trust; and
- (l) Information obtained from third party(ies) in instances of suspected fraud, criminal records information, debt and theft information etc.

## **2.2 Where we collect personal data**

We may collect your personal data in the following ways (not exhaustive):

- (a) when you submit an account opening form or any other forms relating to any products and services offered and/or distributed by us;
- (b) when you enter into any agreement or provide other documentation or information in respect of your interactions and transactions with us, or when you use our services;

- (c) when you interact with our Representatives or appointed service providers (telephone calls, letters, social media platforms, surveys, emails etc);
- (d) when you use our electronic services, or interact with us via our website or use services on our website;
- (e) when you request us to contact you (on your request for more information about product or service, complaints or any other purposes);
- (f) when you update your contact details with us;
- (g) when you respond to our promotions, lucky draws, contest, events, initiatives, surveys organised by Manulife, our Representatives or service providers and/or any other request for personal data;
- (h) from a broker or other intermediary (e.g. distributors or business partners) who we work with to provide products or services or quote to you;
- (i) cookies, location services, IP addresses when you visit our website;
- (j) when your images are captured by us via CCTV cameras while you are within any of our premises, or via photographs or videos taken by us, our Representatives or service providers when you attend our events;
- (k) when we receive information from third party(ies) about you when you make payment;
- (l) from other sources such as fraud prevention agencies, credit reference agencies, other lenders, publicly available directories and information (e.g.: social media, internet, news articles etc), debt recovery and/or other organisation to assist in prevention and detection of crime, police and law enforcement agencies;
- (m) when we seek information from third party(ies) about you in connection with the products and services you have applied for; including but not limited to from other insurers, insurance associations, healthcare associations, clinics, investigators, ex-employer and the relevant authorities; or when you submit your personal data to us for any other reason;
- (n) other publicly available sources where relevant and appropriate; and/or
- (o) when you submit an application to use as a candidate for a Representative position or when you provide documents or information including your resume and/or curriculum vitae in connection with any appointment as a Representative or any other position.

## **2.3 How we use personal data**

The purposes for which personal data of our clients may be collected or used will vary depending on the nature of your relationship with us. For example, we may collect, use and/or disclose your personal data to:

- (a) promote our products and services, including on third-party websites that are not affiliated with us, through contracts with advertising agencies and marketing firms. These contracted service

providers may employ interest-based or online behavioural advertising techniques in order to display advertisements that are more likely to be of interest to you;

- (b) analyse the use of our website through the use of web analytics services. These tools use cookies to collect and generate information about your visits to our website (including your IP address) that is transmitted to their servers in an anonymous form for processing. We study patterns of website activity so we can improve the experience of visitors to our sites;
- (c) confirm your identity and uniquely verify your identity;
- (d) confirm the accuracy of the information collected;
- (e) processing, assessing and determining applications or requests made by you for products and/or services, including carrying out on your behalf any transfers of assets or transactions contemplated on the Manulife Investments iFunds Singapore ("**iFunds**") platform and the services provided by Manulife to you;
- (f) properly administer, maintain, manage and operate the products and services we provide, including the investigation, review, assessment and settlement of claims;
- (g) understanding your financial situation better, evaluating customer application, assessing any risk Manulife is assuming;
- (h) providing investment management services, dealing and advisory services, custody services and other services under the terms and conditions of the accounts you hold with Manulife, including disclosing your personal data to third party service providers for such third party service providers to provide such services to Manulife in respect of the iFunds platform or to you in respect of your assets and monies transacted through your account on the iFunds platform;
- (i) communicate with you, especially with respect to your account, updates and changes;
- (j) provide you with ongoing services and respond to your queries, feedback, requests or instructions;
- (k) make or obtain payments;
- (l) recover any debts owed to us;
- (m) detect, investigate and prevent errors, misrepresentations, fraud, or other unlawful or improper activities;
- (n) coach employees and monitor for quality assurance;
- (o) comply with all legal and regulatory requirements within and outside Singapore including disclosures to judicial, regulatory, government, statutory authorities and industry entities;
- (p) resolve complaints, managing and preparing on incidents and handle requests for data access or correction;

- (q) conduct compliance monitoring and audit reviews;
- (r) compile statistics to design and improve products and services, or participate in industry exercises and studies;
- (s) assist us to understand the current and future needs of our clients, for example, to conduct surveys and other forms of market research and analysis;
- (t) perform any functions and activities related to products or services including but not limited to marketing, audit, reporting, research, analysis, reinsurance, general servicing and maintenance of online and other services;
- (u) administering contests, lucky draws and events;
- (v) design, promote, improve and further the provision of our financial products, services and promotions;
- (w) conduct checks with the National Do Not Call Registry and our internal Do Not Call Registry;
- (x) making disclosure under and/or complying with the requirements of any law, rule, regulation, code of practice, guideline or guidance binding on or applicable to Manulife or any investment fund distributed or made available for investment by Manulife, in the past or at present, via an iFunds account (whether within or outside Singapore) including but not limited to making disclosure to local or foreign regulators, governmental bodies, industry recognized bodies (whether within or outside Singapore) such as investment fund federations or associations, credit reference agencies or auditors;
- (y) comply with any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognized bodies (whether within or outside Singapore) that is assumed by or imposed on us or any investment fund distributed or made available for investment by Manulife, in the past or at present, via an iFunds account by reason of its financial, commercial, business or other activities in or related to the jurisdiction of the relevant local or foreign regulators, governmental bodies, or industry recognised bodies;
- (z) for operational purposes, credit assessment, credit scoring models or statistical analysis (including in each case, behaviour analysis and evaluation of the overall relationship with our group of companies which includes using such data to comply with any obligations, requirements, policies, procedures, measures or arrangements for sharing data and information within our group of companies and/or other use of data and information in accordance with any group-wide programmes or in relation to any investment fund distributed or made available for investment by Manulife, in the past or at present, via an iFunds account for compliance with extraterritorial enforcement of tax, sanctions or prevention or detection of money laundering, terrorism financing or other unlawful activities), whether on our clients or otherwise;
- (aa) exercise any rights we may have in connection with the provision of products and services to you;
- (bb) conducting identity and/or credit checks;

- (cc) determining any amount of indebtedness owing to or from you, and collecting and recovering any amount owing from you or any person who has provided any security or undertaking for your liabilities;
- (dd) enable an actual or proposed assignee, transferee, participant or sub-participant of our rights or business to evaluate the transaction intended to be the subject of the assignment, transfer, participation or sub-participation;
- (ee) market financial products where specifically or deemed consented to or where permissible under applicable laws or regulations;
- (ff) for any other purposes specifically provided for in any particular product or service offered by us or permitted or required by law or the relevant authorities;
- (gg) personalize and enhance your experience while you are visiting or using our Websites and Apps and make navigation easier;
- (hh) enable you to use our online planning, digital advice, or investment strategy tools;
- (ii) allow our web server to determine whether the cookies setting on your web browser has been enabled or disabled so that we will know whether data can be collected from your web browser;
- (jj) track your visits to our website and recognize your web browser when you are a repeat visitor so that we can gather statistics on the number of new and repeat visitors and evaluate our website effectiveness;
- (kk) deliver targeted advertising of Manulife products and services on our website;
- (ll) enable contracted third parties (including any custodian or broker) to perform services or functions on our behalf. They are required to safeguard the information we share with them and can only use it for our contracted business purposes; or
- (mm) any purpose relating to the above (including seeking professional advice) or any other purpose in accordance with the general policies of Manulife in relation to insurance, investment funds, wealth management services and other financial products and services as set out in notices, circulars, or other terms and conditions made available by Manulife to you from time to time.

In some circumstances we may anonymize your personal data so that it no longer identifies you, and therefore allowing us to retain and use such anonymized data without restriction, including for data analytics.

## **2.4 To whom we disclose personal data**

Personal data held by us will be kept confidential, but we may disclose or transfer such personal data including without limitation to the following persons and/or entities (whether within or outside Singapore) for any of the purposes set out in Section 2.3 above:



- (a) any person in connection with any claims made by or against or otherwise involving our clients in respect of any products and services;
- (b) financial institutions, credit card companies, credit reference agencies (including any debt collection agencies) and industry bodies, to facilitate the processing of your applications, claims or any other procedures;
- (c) any agent, contractor or third-party service provider who provides administrative, consultative, telecommunications, computer, information technology, payment, data processing or storage, claim investigation, marketing, mailing, printing, telemarketing, customer satisfaction analysis, or other services, or any member of Manulife group of companies in connection with the operation of our business, including any custodian, administrator, investment manager, investment consultant or distributor;
- (d) any financial consultant, bank partner, broker, introducer, advisor or other intermediary (including their employees);
- (e) any service provider, financial institution or investment platform in connection with processing, assessing and determining applications or requests made by you for products and/or services, including carrying out on your behalf any transfers of assets or transactions contemplated on the iFunds platform and the services provided by Manulife to you;
- (f) any person which has undertaken to us or any member of Manulife group of companies to keep such personal data confidential;
- (g) any member of Manulife group of companies, where such a disclosure is required for the provision of products or services to you;
- (h) any person to whom we or any member of Manulife group of companies is under an obligation or otherwise required to make disclosure under the requirements of any laws, rules, regulations, codes of practice, guidelines or guidance binding on or applicable to us or any member of Manulife group of companies including but not limited to any local or foreign regulators, governmental bodies, or industry recognized bodies; or
- (i) any person to whom we or any member of Manulife group of companies is under an obligation or otherwise required to make disclosure pursuant to any contractual or other commitment or arrangement with local or foreign regulators, governmental bodies, or industry recognized bodies that is assumed by or imposed on us or any member of Manulife group of companies by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign regulators, governmental bodies, or industry recognized bodies.

We will not share your personal information, without your consent, with any organization outside Manulife for the purpose of marketing our products or services to you.

### **3. Withdrawal of Consent**

You may withdraw consent for us to collect, use or disclose your personal data for any purpose (e.g. sending you marketing messages) by contacting us directly using the contact details set out under the section titled "Contact Information" below. Upon receipt of your notice to withdraw consent, we will

inform you of the likely consequences of the consent withdrawal. In some cases, withdrawing your consent may have an impact on our ability to provide financial products and services to you and we may not be in a position to continue providing our services to you and we shall, in such circumstances, notify you before completing the processing of your request. Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclose without consent is permitted or required under applicable laws or regulations.

#### **4. Transfer of Personal Data Outside of Singapore**

We operate our business in Singapore and for contractual, legal or business reasons, we may transfer personal data to any member of Manulife group of companies or service providers located outside Singapore. We will use legally binding instruments and other safeguards to ensure that appropriate levels of protection necessary to maintain the security of your personal data are in place and that any transferred personal data is processed only in accordance with the Act and any other applicable laws and regulations.

#### **5. Personal data of another person**

If you give us personal information about another person(s), we will assume that they have appointed and authorised you to act on their behalf.

This includes providing consent to:

- Our processing of their personal information as mentioned above; and
- You are receiving our information protection notices on their behalf.

You warrant that where you have disclosed personal data of third parties to Manulife and its service providers and agents in connection with the purposes set out in this Statement, you have obtained the prior consent of such third parties for Manulife and its service providers and agents to collect, use and disclose such personal data for such purposes, in accordance with any applicable laws, regulations and/or guidelines. You will indemnify Manulife and its service providers and agents in respect of any penalties, liabilities, claims, demands, losses and damages as a result of breach of this warranty. Upon reasonable request from Manulife, you agree to provide to Manulife a copy of document(s) containing such consent or which evidences that the relevant third party individual has given such consent.

#### **6. Use of Cookies**

By continuing to use our website and allowing the use of cookies, you consent to the collection, use and/or disclosure of your personal information using cookies for the purposes as set out in our [Cookies Policy](#).

#### **7. Changes to this Statement**

We reserve the right to modify or change this Statement from time to time on our website. We encourage you to check this Statement periodically to read and understand our latest policy and practices regarding the handling of your personal data.

The date as stated below indicates the last time this Statement was revised.

## **8. Contact Information**

For any complaints, questions, concerns about our personal data protection policies and practices, withdrawal of consent, or to request access to, update or correct the personal data within our possession and control, please contact:

The Data Protection Officer  
Manulife Investment Management (Singapore) Pte. Ltd.  
8 Cross Street, #16-01 Manulife Tower, Singapore 048424  
Email: [SGP\\_MIM\\_Compliance@manulifeam.com](mailto:SGP_MIM_Compliance@manulifeam.com)

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