

## **PRIVACY NOTICE FOR AIMS ASSET MANAGEMENT SDN. BHD.**

Dear Fund Investors,

This Privacy Notice clarifies confidentiality obligations we may owe you. It serves to give information regarding your personal information and describes the basis on which we process your personal information, its purposes, your privacy rights and how we protect your personal information.

### **Who are we?**

AIMS Asset Management Sdn. Bhd. is a licensed Foreign Fund Management Company in Malaysia and operating from our office in Kuala Lumpur, Malaysia. We are licensed by the Securities Commission of Malaysia as a regulated financial entity. By appointment, we are the Investment Manager of the Funds under our management.

### **What information we might collect from you?**

In the conduct of our business, we may obtain personal information about you on your investment or proposed investment in a Fund managed by us. The personal information includes, without limitation:

**Contact Details:** Information such as your name, postal address, contact numbers, nationality/place of incorporation, e-mail address and other contact details.

**Payment Data:** Information necessary for us to process payments such as account name and number, security code number and other billing details.

**Tax Details:** Information such as your tax identification number, tax residency and other details pertaining your tax status.

**Financial Details:** Information such as source of funds and other financial information.

**Other Compliance Details:** Information we are legally required to collect for compliance purposes such as "Know Your Client" checks, details relevant to international sanctions and restrictive measure, litigations, and any other details that may impact our ability to act.

This information may come from sources such as executed subscription forms, written, electronic or verbal correspondences between you and us and platforms which allow us to access publicly available information.

### **How your information that we collect is used?**

We collect your personal information, as both a controller and processor, to fulfil our contractual obligations, our statutory obligations and other reasons for which we have lawful basis to (i) comply with legal and regulatory requirements to prevent money laundering and/or terrorist financing, (ii) perform "Know Your Client" checks, (iii) verify the status of your eligibility for the funds or services offered by us, (iv) comply with tax reporting requirements and (v) communicate with you regarding your investment in the Funds under our management.

If you have provided special categories of personal data to us for us to satisfy our obligation to respond to certain requests, we do so with your explicit consent. We will not process your personal information in order to communicate with you for marketing purposes without your consent.

### **How will we share your information we have collected?**

Internally: As we are not part of any group of entities, your information will be accessible by our employees. Our employees are not permitted to share the information we have collected from you with the public and/or unrelated parties, except as described herein or permitted by the privacy laws or other applicable laws.

Externally: We may share your personal information with third parties where the third parties require such information to carry out any of the purposes set forth above, such as Fund Administrators duly appointed by the Funds, Custodians duly appointed by the Funds and other relevant service providers appointed by the Funds.

Where your information is processed by us outside the European Economic Area (“EEA”), we will ensure appropriate safeguards are put in place to adequately protect it. In the event that your personal data is transferred to third parties listed above that are outside of the EEA, we will ensure we meet the relevant requirements of applicable privacy regulations for such transfers which may include but not limited to:

- 1) We are satisfied that the non-EEA country has data protection laws similar to the laws in the EEA;
- 2) We are satisfied that the recipient has agreed through contract to protect the information in the same data protection standards as the EEA; or
- 3) We are satisfied that we have obtained consent from relevant data subjects to the transfer.

### **How long do we keep your information?**

We are obligated to retain your personal information for a period of at least seven years from the date on which the business relationship commences or a later date on which the last transaction is completed. We will delete your personal data once it is no longer necessary for us to keep them for the purposes set forth above except as required or permitted by applicable law or regulation.

### **What are your rights to your information provided to us?**

You have the right to:

- 1) access and check the personal data we hold on you;
- 2) request for a correction of information about you that is inaccurate;
- 3) object or restrict our use of your personal data save for when the information is needed for the performance of our legal and compliance obligation; and
- 4) have a copy of the personal data we hold about you provided to you or transmitted to another controller where technically feasible.

To do so, please send your request to [admin@aimskl.com](mailto:admin@aimskl.com). You are required to ensure that the personal information we hold about you is up-to-date and accurate at all times. For any changes of any information provided to us, we request that you also notify us through the email provided above.

We may charge you a reasonable administrative fee for additional copies of the data you may request.

### **What steps do we take to ensure that your personal data is secured and how will you be informed of any breaches?**

It is our priority to safeguard your non-public personal information. We continuously ensure sufficient physical, electronic and procedural safeguards to protect against unauthorised access to the information we keep.

In any case that our IT systems are compromised resulting in a personal data breach, we are obliged to notify your supervisory authority within 72 hours when the breach is detected.

### **How do I enquire or complain?**

Please email your enquiry or complain to [admin@aimskl.com](mailto:admin@aimskl.com). We will promptly respond to your requests and complaints. In the event that you are unhappy with our response, you may escalate the matter to the relevant privacy regulator. We can provide you with the details of the relevant regulator upon your request.

### **Acceptance of Privacy Notice and changes to our Privacy Notice**

By taking no action upon receipt of this notice, you accept and agree to the collection and use of your personal data for the purposes set forth above.

We review our policies regularly and may occasionally change or update them. This Privacy Notice was last reviewed and updated on 24 May 2018.