

# **Privacy Policy**

## **1. INTRODUCTION AND APPLICATION**

1.1 This policy ("Privacy Policy") describes how Brahman Capital Management Pte Ltd and Brahman Pure Alpha Pte Ltd (collectively, "Brahman") and affiliates manages Personal Data which is in our possession or under our control. "Personal Data", is defined in the Personal Data Protection Act (No. 26 of 2012) of Singapore ("PDPA"), and currently refers to data, whether true or not, about an individual who can be identified from that data; or from that data and other information to which we have or are likely to have access to.

1.2 By using our services pursuant to your agreement(s) with us ("Services"), operating any account maintained with us, websites, or otherwise providing information to or communicating with us, you are taken to have agreed to our collection, use, processing and disclosure of your Personal Data in accordance with this Privacy Policy.

1.3 This Privacy Policy does not supersede or replace any other consents you may have previously or separately provided to us in respect of your Personal Data, and your consent to this Privacy Policy is in addition to any other rights which we may have at law to collect, use, process or disclose your Personal Data.

1.4 The words "we", "us", "our" or any of their derivatives refer to Brahman and its affiliates. The words "you", "your", "yours" or any of their derivatives refer to the person using our Services, operating any account maintained with us, accessing website or otherwise providing information to or communicating with us and shall include, as the context may require, personal representatives (as the case may be).

1.5 This Privacy Policy shall be governed by, and construed in accordance with, the laws of Singapore. Without prejudice to your rights under any applicable laws, any dispute arising out of or in connection with this Privacy Policy and/or the documents referred to herein, including any question regarding their existence, validity or termination, shall be referred to and finally resolved by the Courts of Singapore and both you and we hereby unconditionally and irrevocably submit to the exclusive jurisdiction of the Courts of Singapore.

## **2. PERSONAL DATA THAT WE COLLECT**

2.1 We collect, use, disclose, transfer and otherwise process Personal Data about you or individuals who are connected or associated with you including but not limited to your legal representatives ("Associated Persons") in accordance with this Privacy Policy.

2.2 The Personal Data that we collect or may collect include:

- (a) personal contact data including name, telephone number, email address, residential address and correspondence address;
- (b) specimen signature(s);
- (c) occupation, education and income levels;
- (d) identification card or passport number, date of birth, place of birth and other information for the verification of identity;
- (e) financial and banking information (e.g. Information on net assets, income, expenses, credit history, bank account and banking transactions, securities trading account);
- (f) images and voice recordings of our conversations with you;
- (g) tax and insurance information;
- (h) information about your risk profile, investments, investment objectives;
- (i) personal opinions made known to us (e.g. your feedback or responses to any surveys);
- (j) browsing history, patterns or other unique information;
- (k) your internet protocol address and information associated with such address;
- (l) any other personal data reasonably required in order for us to provide the services requested by you; and
- (m) any other personal data permitted by or required to comply with any applicable local or foreign laws, rules, acts, regulations, subsidiary legislation notices, notifications, circulars, licence conditions, directions, requests, requirements, guidelines, directives, codes, information papers, practice notes, demands, guidance and/or decisions of any national, state or local government, any agency, exchange, regulatory or self-regulatory body, law enforcement body, court, central bank or tax revenue authority or any other authority whether in Singapore or elsewhere, whether having the force of law or not (including any intergovernmental agreement between the governments or regulatory authorities of two or more jurisdictions or otherwise), as may be amended from time to time ("Applicable Laws") and our internal control and compliance policies.

### **3. SOURCES OF INFORMATION**

3.1 The Personal Data has/or will be obtained from the following sources, where applicable, or such other sources which we may see fit from time to time:

- (a) information provided or submitted by you through among others, your dealings and agreements with us, which includes information provided when registering as a user, providing information regarding any account which you may open with us, providing answers to security questions, completing any confirmations, declarations or forms, or through your utilization of any of our Services;
- (b) as applicable, publicly available or publicly accessible information; and
- (c) such other written, electronic or verbal communications or documents delivered to us prior to and during the course of our contractual or pre-contractual dealings with you.

3.2 As the accuracy of your Personal Data depends largely on the information you provide to us, you should inform us as soon as practicable if there are any errors in the Personal Data or if there have been any changes to the Personal Data. We intend to keep the Personal Data accurate and up-to-date, and retain the Personal Data no longer than necessary for the above purposes or as required or permitted by any applicable law.

## **4. PURPOSE OF COLLECTING, USING AND DISCLOSING YOUR PERSONAL DATA**

4.1 We may use your Personal Data for our business purposes, including the provision of Services to you. This includes, the following purposes ("Purposes"):

- (a) provision of the Services as requested by you;
- (b) carrying out any transactions on your behalf;
- (c) assessing and processing applications, instructions or requests from you;
- (d) communicating with you, including providing you with updates on changes to our Services;
- (e) to verify your identity for the purposes of providing Services to you;
- (f) conducting due diligence checks, screenings or credit checks as may be required by any Applicable Laws or our internal policies and procedures;
- (g) for the specific purpose for which it was volunteered or provided to us;
- (h) to detect and protect us or any third parties against negligence, fraud, theft and other illegal activities;
- (i) to understand your needs and preferences;
- (j) improving the content, appearance and utility of our website;
- (k) to manage and develop infrastructure and business operations;
- (l) to administer any account which you may open with us;
- (m) to process payments;
- (n) to comply with our internal policies and procedures;
- (o) to respond to queries or feedback;
- (p) to address or investigate any complaints, claims or disputes;
- (q) as permitted by any Applicable Laws;
- (r) to comply with any Applicable Laws or any request from any relevant governmental or regulatory authority;
- (s) financial reporting, regulatory reporting, management reporting, risk management, audit and record keeping purposes;
- (t) enforcing obligations owed to us;
- (u) seeking professional advice, including legal advice;
- (v) any other reasonable purposes in connection with the provision of our Services;
- (w) with your consent, providing you with marketing materials in connection with the services we may provide;
- (x) fulfilling any purpose directly related to the above Purposes; or
- (y) any other purposes that are appropriate or authorized by any Applicable Laws.

## **5. DISCLOSURE AND SHARING OF YOUR PERSONAL DATA**

We may from time to time disclose and share your Personal Data to our directors, officers, employees, representatives, agents or delegates or any third parties, whether located in Singapore or otherwise, to carry out the Purposes. This includes, disclosing and sharing your Personal Data with the following:

- (a) any of our directors, officers, employees, representatives, agents or delegates;
- (b) any of our related corporations, and any of their successors or assigns, and their directors, officers, employees, representatives, agents or delegates;
- (c) our professional advisers, consultants and auditors;
- (d) any service providers, agents, contractors, delegates, suppliers or third parties which we may appoint from time to time to provide us with services in connection with the Services that we offer to you, and their directors, officers, employees, representatives, agents or delegates;
- (e) any sub-contractors which any of our service providers, agents, suppliers, delegates or contractors may appoint from time to time to provide them with services we offer to you, and their directors, officers, employees, representatives, agents or delegates;
- (f) anyone who takes over or may take over all or part of our rights or obligations under any agreement we have with you or anyone any agreement we have with you (or any part thereof) is transferred to or may be transferred to;
- (g) any person who we believe in good faith to be your legal advisers or other professionals;
- (h) any relevant governmental or regulatory authority, in so far as we need to do so to keep to any Applicable Laws, or which we in good faith believe that we should keep to; and
- (i) pursuant to a request by any relevant governmental or regulatory authority (regardless of the reason for such request and whether such request is exercised under a court order or otherwise);
- (j) parties which assist us in carrying out the Purposes laid out above in this Privacy Policy; and
- (k) any person to whom we are, in our belief in good faith, under an obligation to make disclosure as required by any Applicable Laws,

provided that in the case of disclosures under any of the circumstances in (a) to (d), we shall procure that the recipient is subject to the same duty of confidence.

## **6. TRANSFER OF YOUR PERSONAL DATA OUTSIDE SINGAPORE**

We may transfer, store, process and/or deal with your Personal Data outside Singapore. In doing so, we will comply with the PDPA and other applicable data protection and privacy laws.

## **7. RETAINING YOUR PERSONAL DATA**

Your Personal Data is retained as long as the purpose for which it was collected remains and until it is no longer necessary for any other business purposes or to comply with any Applicable Laws.

## **8. RIGHTS OF ACCESS AND RECTIFICATION**

However, you may also request access to Personal Data we hold, or request the rectification of any inaccurate data. If you would like to do so, please contact our Data Protection Officer at [compliance@brahman.sg](mailto:compliance@brahman.sg).

## **9. CHANGES**

Our Privacy Policy may change from time to time. We will post any privacy policy changes on this page, for which you will be notified. If you continue to use our Services, operate any account maintained with us, websites, and/or otherwise provide information to or communicate with us, you are deemed to have agreed to such changes without reservation.

## **12. CONTACTING US**

If you have any questions about any aspects of this policy or your Personal Data, please contact our Data Protection Officer at [compliance@brahman.sg](mailto:compliance@brahman.sg).

# **Privacy Notice For Data Subjects From The EEA**

## **1. PRIVACY NOTICE**

Your privacy is important to us. This privacy notice (“Privacy Notice”) applies to every person from the EEA:

- who visits or registers with brahman.sg or any other of our websites where this policy is posted (each a “Site”);
- who uses the products and services that we make available or provide (our “Services”);
- whose personal data we may process as a result of providing the Services to others;
- who contacts Brahman either in relation to the Site or the Services; or
- who applies to work at Brahman.

## **2. PURPOSES OF THIS NOTICE**

This Privacy Notice explains to data subjects in the EEA the type of personal data that Brahman Capital Management Pte Ltd (“Brahman”) and affiliates (“we”, or “us”) might collect from you, or which we have obtained about you from a third party, the purposes for which we process your personal data and your rights in respect of our processing of your personal data.

Please note that when using the Site it should be read in conjunction with our Website Terms of Use.

Please also note that this Privacy Notice only applies to the use of your personal data obtained by us, it does not apply to your personal data collected during your communications with third parties.

## **3. PERSONAL DATA COLLECTION**

Our primary goal in collecting personal data from you may be: (i) to verify your identity; (ii) to help us deliver the Services; (iii) to develop new products or Services and conduct analysis to enhance current products and Services; (iv) to review the usage and operations of the site; (v) to provide you with customised Site content and site; (vi) to carry out requests made by you on the Site or in relation to Services; (vii) to investigate or settle inquiries or disputes; (viii) to comply with any applicable law, court order, other judicial process, or the requirements of any relevant regulator; (ix) to enforce our agreements with you; (x) to protect the rights, property or safety of us or third parties, including our other clients and users of the Site or Services; (xi) to provide support for the provision of Services; (xii) for recruitment, talent management, brand building, company communications and employment purposes; and (xiii) to use as otherwise required or permitted by law.

**To undertake these goals we may process the following personal data:**

- Visitors to the Site
- Individuals whose personal information may be processed by us as a result of providing the Services to them or to others (including corporate clients, investors or intermediaries)
- Potential recruits to Brahman
- Suppliers (including trading counterparties, subcontractors and individuals associated with our suppliers and subcontractors)

**Visitors to the Site**

- Contact information, including your name, job title, address, email address, telephone, or mobile number.
- Your interaction with the Site.
- IP address.
- Demographic information such as postcode, preferences and interests (including demographic information provided by third parties which may include amongst other things: location, hardware details for trouble shooting, search engine and social media interactions).
- Other information relevant to provision of Services.
- Any other personal data you provide to us

**Individuals whose personal information may be processed by us as a result of providing the Services to them or others (including corporate clients, investors or intermediaries)**

Primarily Brahman is engaged by corporate clients, investors or intermediaries (i.e. other corporate entities) and as such those clients, investors or intermediaries are not data subjects. However as part of such instructions personal data about other persons may be provided to us, e.g. personal data relating, without limitation, to any workers, employees, partners, members, directors, representatives or similar of our corporate clients, investors or intermediaries or prospective clients, investors or intermediaries).

The following is a non-exhaustive list which is reflective of the varied nature of the personal data processed as part of our business.

For instance, if we are providing services to a corporate client, investor or intermediary we may be provided with, and then process, personal data about their representatives including but not limited to the representative's name, address, identity details and contact details and any other information necessary to fulfil the Services (e.g. but without limitation including any regulatory Know Your Client and or Anti Money Laundering regulations (or similar) information).

We might also need to process personal data in relation to a corporate client's, investor's or shareholder's workers who use a Service in the course of their work for such corporate entity.

Please note that in this Privacy Notice when we reference the processing of personal data related to any corporate clients, investors, or intermediaries we also mean any individual whose personal data may be processed by us as a result of providing the Services.

#### **Potential recruits to Brahman**

- Name and job title.
- Contact information including email address.
- Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.
- Other information relevant to potential recruitment t (including background checks, reference checks, immigration status, relevant test scores in relation to any application).
- Any other personal data you provide to us as part of any application for a job at Brahman.
- Please note that Brahman may also receive information from third party recruiters, agents and from your references as part of any recruitment process.

#### **Suppliers (including trading counterparties, subcontractors and individuals associated with our suppliers and subcontractors)**

We collect and process personal data about our suppliers (including trading counterparties) and their representatives in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide the Services to our clients.

## **4. PERSONAL INFORMATION USE**

We may use your personal data for the following purposes:

- Fulfilment of Services.
- Business management, administration and legal and regulatory compliance.
- Recruitment and Talent Management.
- Insight and Analysis.
- Marketing communications. We carry out the following marketing activities using your personal data:
  - Email marketing.



- Your feedback about our Services.

### **Fulfilment of Services**

We collect and maintain personal data that you voluntarily submit to us during your use of the Site and/or our Services to enable us to perform the Services that we provide to you. Please note also that the terms of the relevant contract will also apply when we provide Services.

These purposes include:

- to ensure any investor is aware of the performance of their investment;
- to make necessary regulatory communications with clients, investors or intermediaries;
- general client, investor, or intermediary management to ensure Services are provided correctly; and
- relationship management between Brahman and any client, investor, shareholder or intermediary.

### **What is our legal basis?**

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or where it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in the best way that we can.

### **Business management, administration and legal and regulatory compliance.**

We use your personal data for the following business management, administration and legal and regulatory compliance purposes:

- to manage and administer Brahman's business;
- to manage and administer any investment funds that we manage and in which you may be an investor (please note further information will be provided in the relevant Private Placing Memorandum ("PPM"));
- to comply with our applicable legal and regulatory obligations, including but not limited to Know Your Client, AntiMoney Laundering or Anti-Bribery or similar obligations);
- to enforce our legal rights;
- to maintain regulatory records of our business activities;
- to make any necessary corporate filings;
- protect rights of third parties; and

- in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.

### **What is our legal basis?**

Where we use your personal data in connection with a business transition, to enforce our legal rights, or to protect the rights of third parties it is in our or a third party's legitimate interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us.

### **Recruitment and Talent Management**

We use your personal data for the following recruitment and talent management purposes:

- to assess your suitability for any position for which you may apply at Brahman (or future positions for which we think you may be suitable) including employment or freelancer positions, member level positions, internships and also any business support or services role whether such application has been received by us online, via email or by hard copy or in person application;
- to take any steps necessary to enter into any contract of employment (or otherwise) with you;
- to comply with any regulatory or legal obligations in relation to any such application; and
- to review Brahman's equal opportunity profile in accordance with applicable legislation. Brahman does not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation.

### **What is our legal basis?**

Where we use your personal data in connection with recruitment and talent management it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment and talent management decisions for Brahman or it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent.

**Marketing communications. We carry out the following marketing activities using your personal data:**

#### **Email marketing**

We use information that we observe about you from your interactions with our Site, our email communications to you, our interactions with you on our other digital channels such as social media and/or with Services (see the Insight and Analysis section above for more details of the information collected and how it is collected) and/or your address details, to provide information that we think will be of interest about us and our Services. For example newsletters, and where permitted by applicable law, marketing materials, from Brahman.

#### **What is our legal basis?**

Where your personal data is anonymised, we do not require a legal basis to use it as the personal data will no longer constitute personal data that is regulated under data protection laws. However, our collection and use of such anonymised information may be subject to other laws where your consent is required. Please see the “Our use of cookies and similar technologies” section for further details.

Where your personal data is not in an anonymous form, such as your email address, it is in our legitimate interest to use your personal data for email marketing.

We will only send you marketing communications via email where you have consented to receive such marketing communications or where we have a lawful right to do so.

#### **Your feedback about our Services**

From time to time we will contact you to invite you to provide feedback about our Services. We use this information to help us improve the quality of service provided by our staff. We also use your feedback to monitor the quality of our Services.

#### **What is our legal basis?**

It is in our legitimate business interests to use the information you provide to us in your feedback for the purposes described above.

## **5. HOW DO WE OBTAIN YOUR CONSENT?**

Where our use of your personal data requires your consent, you can provide such consent:

- at the time we collect your personal data following any instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice.

## **6. OUR USE OF COOKIES AND SIMILAR TECHNOLOGIES**

The Site uses certain essential and functional cookies, pixels, beacons, log files and other technologies to allow the Site to function (all referred to as “cookies”).

## 7. PERSONAL INFORMATION SHARING

We will only share personal data with others when we are legally permitted to do so. When we share personal data with others, we use reasonable efforts to put contractual arrangements and security mechanisms in place to protect the personal data and to comply with our data protection, confidentiality and security standards.

Please note that when processing your personal data we may need to share it with other third parties as follows:

- Our affiliated companies and licensees, including subsidiaries of such companies.
- Third party service providers that provide applications/functionality, data processing or IT services to us.
- We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security, recruitment portals, advertising and marketing and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world and personal data may be stored in any one of them.
- Third party service providers that otherwise assist us in providing Services or information (including but without limitation any Fund Administrator of an investment fund managed by Brahman).
- Third party organisations that assist us with our marketing activities listing above.
- Auditors, lawyers, accountants and other professional advisers.
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

## 8. EXTRA-EEA TRANSFERS

Please note that, due to the international operations of Brahman, where necessary to deliver the Services we will transfer personal data to countries outside the EEA (including Brahman's US and Singapore operations) and such personal data may be stored on servers located outside the EEA. When doing so we will use reasonable efforts to comply with our legal and regulatory obligations in relation to the personal information including but without limitation having a lawful basis for transferring personal data and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data.

## **9. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?**

Regarding visitors to the Site, we will retain relevant personal data for at least six years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations).

Regarding personal data we have processed as part of providing you with the Services, we will retain relevant personal data for at least six years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation or similar legislation around the world (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations). We may then destroy such files without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

Regarding personal data we have processed in relation to any recruitment activity, if you are unsuccessful in your application your personal data will be kept for a period after informing you that you were unsuccessful. If you are successful any retention protocols that apply to staff members at Brahman will apply. In considering how long to keep your personal data its relevance to Brahman's business and your potential employment either as a record or in the event of a legal claim will be taken into account.

## **10. PERSONAL DATA SECURITY**

We take the security of all the personal data we hold very seriously. We use reasonable efforts to adhere to internationally recognised security standards. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the personal data we hold secure.

## **11. YOUR RIGHTS AND ACCESS TO PERSONAL DATA**

You have the following rights in relation to the personal data we hold about you:

- Right of access.
- Right to rectification.
- Right to erasure.
- Right to restrict processing.
- Right to data portability.
- Right to object.
- Rights in relation to automated decision-making and profiling.

- Right to withdraw consent.
- Right to lodge a complaint with the supervisory authority.

### **Right of access**

If you ask us, we will confirm whether we are processing your personal data and, if necessary, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

### **Right to rectification**

If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we have shared your personal data with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

### **Right to erasure**

You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

### **Right to restrict processing**

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we have shared your personal data with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

### **Right to data portability**

With effect from May 25, 2018, you have the right, in certain circumstances, to obtain personal data you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

### **Right to object**

You can ask us to stop processing your personal data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or
- processing your personal data for direct marketing.

### **Rights in relation to automated decision-making and profiling**

You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

### **Right to withdraw consent**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time. However, please be aware that such withdrawal of consent may affect our or our affiliates or other third party's ability to provide Services to you or other person, and may affect whether we continue to provide those services to you or other person.

### **Right to lodge a complaint with the supervisory authority**

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, you can report it to your local data protection regulators.

## **12. REVISIONS TO THIS PRIVACY NOTICE**

We may make changes to this Privacy Notice from time to time.

To ensure that you are always aware of how we use your personal data we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We encourage you to review this Privacy Notice periodically to be informed of how we use your personal data.

## **13. CONTACT US**

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an e-mail to [compliance@brahman.sg](mailto:compliance@brahman.sg); or

EFFECTIVE DATE: May 25, 2018, Version Number 1

## Privacy Policy Notice for U.S. Accounts

Financial companies choose how they share your personal information. U.S. Federal law gives our investors the right to limit some but not all sharing. US Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this “**Privacy Policy Notice**” carefully to understand what we do.

Brahman (“**Brahman**” or the “**Firm**” or “**us**”) does not disclose non-public personal information about its prospective, existing or former investors to third parties other than as described below.

*Personal information we collect.* Brahman collects personal information about you in connection with providing advisory services to you. This information includes your name, address, personal identification details, social security number and may include other information such as your:

- Assets;
- Investment experience;
- Transaction history;
- Income; and
- Wire transfer instructions.

*How Brahman collects this information.* Brahman collects this information from you through various means. For example, when you give us your contact information, buy securities (i.e., interests in a fund) from the Firm, tell the Firm where to send money, or make a wire transfer. Brahman also may collect your personal information from other sources. The Firm maintains physical, electronic, and procedural safeguards that comply with federal standards to safeguard your non-public personal information which the Firm believes are adequate to prevent unauthorized disclosure of such information.

*How Brahman uses this information.* All financial companies need to share customers’ personal information to run their everyday business and the Firm uses the personal information collected from you for everyday business purposes. These purposes may include for example:

- To provide advisory services to you.
- To open an account for you.
- To process a transaction for your account.



- To comply with the law (e.g. Know Your Customer and Anti Money Laundering Regulations) and associated internal policies and practices.
- To respond to court orders and legal investigations.

*Disclosure to others.* Brahman may provide your personal information to firms that assist the Firm in servicing your account and have a need for such information, such as a broker or fund administrator, auditors, corporate secretary and regulators both in Singapore or the United States. These sharing practices are consistent with Federal privacy and related laws, and in general, you may not limit our use of your personal information for these purposes under such laws. Brahman notes that the Federal privacy laws only give you the right to limit the certain types of information sharing that the Firm does not engage in (e.g., sharing any personal information with others in order for them to market to you).

*How Brahman protects your personal information.* To protect your personal information from unauthorized access and use, Brahman maintains physical, electronic, and procedural safeguards that comply with Federal law to safeguard non-public personal information which the Firm believes are adequate to prevent unauthorized disclosure of such information. These measures include computer safeguards and secured files and buildings.

This Privacy Policy Notice relates to the following entities:

- Brahman Capital Management Pte Ltd
- Brahman Pure Alpha Pte Ltd Fund

*Who to contact with questions.* If you have any questions about this Privacy Notice, please contact the Data Protection Officer via email at [Compliance@brahman.sg](mailto:Compliance@brahman.sg)