

PRIVACY POLICY

1. Introduction

The protection and security of your personal information is important to **AMPYR Global Energy Holdings Pte. Ltd.**, (Registration Number 201906134K), and/or its parent company, subsidiaries and affiliates, which are referred to in this Policy as “**AMPYR Group**”, “**we**” or “**us**” or “**our**” collectively or singularly as the context requires. We are committed to managing personal information in accordance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and in accordance with other applicable privacy laws. Our Privacy Policy outlines how we collect and handle your personal information in connection with our products or services provided in Australia through AMPYR Group.

2. Types of Information Collected

Personal information means any information or opinion about an identified individual or from which an individual can be reasonably identified. It does not include information where the identity has been removed (anonymous data).

We collect and hold personal information that is necessary for, or related to, one or more of our services or activities; or because it is required under a relevant law or regulation.

The types of personal information that we will collect from you will depend on the nature of your interaction with us. We may collect, use, store and transfer different kinds of personal information about you including as follows:

- **Contact Data** includes full name, residential address, personal email address and personal telephone number.
- **Transaction Data** includes details about products or services your request from us.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us.

From time to time, you may be able to deal with us anonymously or by pseudonym. However, where we need to collect personal information, for example, by law or under the terms of a contract we have with you, and you fail to provide that information when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with products or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. Collection

We collect personal information to provide our products and services and for our business operations. We describe the main types of personal information we collect and the main reasons why we collect that information below.

Information collected may include your name, postal or residential address, email address, telephone number, date of birth, nationality, Tax File Number, bank account and investment details.

We may collect information that you give to us when you or your authorised representatives interact with us, for example, if you contact us regarding an investment. We may also collect information from outside sources such as our business and commercial partners, credit reporting bodies, consultants, other customers and from publicly available sources (such as published content) and data providers, as well as information from AMPYR Group members in Australia or internationally.

We also collect personal information about individuals employed by our suppliers, contractors, dealers, agents and corporate customers. We will explain why we are collecting this information and how we will use that information, unless it is obvious from the circumstances.

When you apply for a job or contract with us, we may collect information about you to help us decide whether to offer you the job or contract. For example, we may collect information about how to contact you, your education or work history, or other information included in your CV or résumé. We may collect this information from you, or from any recruitment consultant, your previous employers, or other referees. This Privacy Policy does not apply to our collection, use and disclosure of information:

- we hold about you once you become an employee;
- we keep after your employment relationship with us ends,

where that collection, use or disclosure relates to your employee relationship with us and the records we hold about you as an employee.

4. Purposes for processing your personal information

We may process any personal information you provide to us to enable us to perform the contract entered into between you and us, to ensure our compliance with legal and regulatory requirements or for the purposes of our legitimate business interests, including the following:

- to enable us to carry out our obligations arising from any contracts and to provide you with the information, products and services that you request from us;
- to enable us to verify your identity;
- to enable us to verify, facilitate, respond to and/or process an enquiry or other request you make when you contact us, including for customer services support;
- to manage your relationship with us;
- to comply with our legal obligations, standards, policies and procedures under applicable law;
- for purposes related to the administration of products and services offered by us;
- to notify you about changes to our products and services;
- for researching, designing and launching financial, investment services or related products for clients;
- to enable us to issue a notice or corrective action to you in relation to any of our services, if required;

- to store, host and/or backup (whether for disaster recovery or otherwise) your personal information, whether within or outside Australia;
- for record-keeping purpose;
- to respond to requests for information from public and governmental/regulatory authorities, statutory board, related companies and for audit, compliance, investigation and inspection purposes;
- to communicate and provide you with the relevant market information you have requested in our newsletters (by email);
- for research and data analysis to improve our products and services. We may do this research or engage a service provider to do this on our behalf; and
- for any other purpose related to the above.

Your personal information will be retained for as long as it is necessary to fulfil the purposes for which it was collected or for business or legal purposes, or in accordance with applicable laws.

When we collect your information, we may explain that we will use and disclose your information in other ways.

We may also remove certain information or alter the information we collect about you so you can no longer be identified from that information. We do this so that we can use it or disclose it to third parties for other purposes.

5. Marketing

We may use your personal information to send you marketing-related information (such as newsletters) from AMPYR Group where it is linked to the products or services we are providing you. You may unsubscribe at any time by clicking on the “unsubscribe” link at the bottom of each marketing communication.

Please note that where you opt-out of receiving marketing communications, we may still send you certain communications relating to your use of our products or services, such as service announcements, notices about information on the products or services and administrative messages.

6. Disclosure of Your Personal Information

Your personal information may be used, disclosed, maintained, accessed, processed and/or transferred to the following third parties, whether located in Australia or outside of Australia, for one or more of the purposes set out above:

- our parent company, subsidiaries and affiliated companies;
- public and government/regulatory authorities, statutory boards, industry associations and/or agencies under applicable laws;
- courts and other alternative dispute forums;

- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal information in the same way as set out in this Privacy Policy;
- banks where we facilitate opening your account for managing your portfolio(s);
- third party service providers which require the processing of your information, for example, third party service providers which have been engaged by us to provide and maintain any IT equipment and cloud computing system used to store and access your personal information; or
- third party service providers who provide administrative, research, design, launch, digital or telecommunication, settlement clearing or other services to us (such as due diligence services, identification verification services, trustees, custodians, investment managers in the operation of our business); or
- Where we provide your personal information to third party services providers, they are required to keep your personal information confidential and secure and must only use your personal information as instructed by.

We may also disclose your personal information where required to respond to authorised requests from public and government/regulatory authorities, statutory boards or where required by any applicable law, including for national security. Where required by law, we may also disclose your personal information where necessary to enforce agreements, to investigate or protect the rights, property or safety of AMPYR Group and our group companies, our products and services and our personnel, customers, distributors or business partners or to prevent or take action regarding illegal activities or fraud, situations involving potential threats to the safety of any person or as evidence in litigation or investigations.

7. Keeping Your Personal Information Secure

We will take all reasonable steps (including appropriate technical and organisational measures) to ensure your personal information is processed securely to protect the confidentiality, integrity and availability of your personal information and in accordance with this Privacy Policy.

The nature of the Internet is such that we cannot guarantee or warrant the security of any information you transmit to us via the Internet and any transmission is at your own risk.

8. Storing Your Personal Information

Your personal information will be stored on servers located in India. It may also be processed by, and transferred to, AMPYR Group personnel or by one of our service providers operating outside of Australia (including in Singapore, India, United Kingdom or other countries). By submitting your personal information to us, you agree and consent of such transfer, storing and processing.

We will ensure that the personal information which we collect from you and transfer to the AMPYR Group or a third-party is adequately protected inside or outside of Australia.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

9. Your Rights

You have a right to request access to and/or correction of the personal information currently in our possession by writing to our Privacy Officer. You also have a right to make a privacy complaint. Further information on how to exercise your rights is below.

10. Accuracy and requests for access and correction of personal information

Where you submit your personal information to us, you should ensure the personal information is accurate, and let us know promptly if the personal information changes so that we are not holding any inaccurate personal information about you.

We will take reasonable steps to ensure that the information we hold about you is relevant, accurate, up-to-date and complete.

You can request that we provide you with access to information we hold about you or ask us to correct any personal information we hold about you that is out-of-date, incorrect, incomplete or misleading. You can contact us by submitting a request in writing to the address set out below. If we are able to, we will action your request within a reasonable timeframe (usually within 30 days) following receipt of your request.

We may decline an access or correction request in circumstances prescribed by the Privacy Act. If complying with your request for access requires considerable time and expense on our part, we may charge you a reasonable fee for providing you with information.

If we do refuse your access or correction request, we will provide you with written reasons for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction (if you ask us to do so).

11. Complaints

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to our Privacy Officer using the contact details set out below. Our Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint.

Your complaint will then be investigated. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.



In most cases, we will investigate and respond to a complaint within a reasonable time, usually within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, you may make a complaint to the Office of the Australian Information Commissioner (**OAIC**). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

12. Changes to this Privacy Policy

We reserve the right to amend this Privacy Policy from time to time and publish on the website. Your continued use of our services following the effective date of amendment of this Privacy Policy will signify your consent to and acceptance of its revised terms.

13. Our Privacy Officer

If you have any questions on this Privacy Policy or data protection matters, please do not hesitate to contact our Privacy Officer at AUS.Privacy@agpgroup.com.