

DWS GLOBAL BUSINESS SERVICES INC.

Privacy Statement

Relating to the Collection, Use, Disclosure and Transfer of Personal Data

In accordance with the Republic Act No. 10173 (Data Privacy Act of 2102) and its Implementing Rules and Regulations (collectively, "Data Privacy Laws"), the following information provides an overview of how DWS Global Business Services Inc. ("DGBSI," "us," or "we") uses information it holds about individuals ("personal data"), such as authorized representatives, signatories, and individual business or supplier contacts ("data subjects" or "you"). This Notice also outlines the data subjects' rights under the Data Privacy Laws.

1. Who is legally responsible for the handling of your personal data and who can you contact about this subject?

When you provide personal data to DGBSI, we act as a **"personal information controller."** It means:

- (a) we "control" the personal data you have provided, including making sure it is kept secure; and
- (b) we make certain independent decisions on how to use and protect your personal data – but only to the extent that we have informed you about the use and/or obtained consent from you, or are otherwise permitted by law.

We are required to handle (or "process") your personal data securely and otherwise in accordance with the Data Privacy Laws. Should you have queries or complaints about the way in which we process your personal data, you may raise these with your usual DWS contact or else with our internal Data Protection Officer via the contact details at the end of this Statement.

2. What personal data might we hold about you and where do we get it from?

We will only hold personal data about you that is relevant in the context of the business relationship which we have with you. Some of this information we will obtain directly from you. We also process personal data from a range of other sources, which may include other DWS and/or Deutsche Bank Group entities, other companies and financial institutions, publicly available sources, credit reference agencies, anti-fraud databases, sanctions lists, and databases of news articles.

DWS Global Business Services Inc.

Postal Address

19/F Four/NEO, 31st Street corner 4th Ave. T +63 (2) 8777 5300
Crescent Park, West Bonifacio Global City, www.dws.com
Philippines 1634

Registered address: 19/F Four/NEO 31st St. cor. 4th Ave. E-Square Zone
Crescent Park, West Bonifacio Global City, Philippines

The types of personal data that we process may include (but are not limited to):

1. Client or supplier/ vendor related:
 - a. Personal Details : such as but not limited to:
 - Full name;
 - Date and place of birth;
 - Mobile and business telephone number;
 - Email address;
 - Business address; or
 - Profession, occupation, job title or designation.
 - b. Financial Standing / Creditworthiness
 - c. Account and Securities / Deposit Information: including –
 - Credit Card details
 - Account balances
 - Transaction history
 - Purchase history
 - Payment history
 - d. Contract-based data of third-party products
2. Employee-related:
 - a. Position and Employment details
 - b. Personal details
 - c. Salary or Social Security data
 - d. System Access / Usage / Authorization

The personal data we collect may be in paper, electronic or any other forms.

If you fail to provide such personal data, we may not be able to provide you with the relevant services (or any part thereof), use the relevant services (or any part thereof) provided by you or conduct other corresponding activities, or comply with any applicable laws, regulations or guidelines and norms of regulatory bodies (or other competent authorities).

When we collect your personal data, we will, as necessary to fulfill any of the purposes stated in Section 3, use it, process it, modify it, share it within the DWS Group, Deutsche Bank Group, and with third parties (including regulators), store it, and delete it.

3. What will we use your personal data for (purposes) and does the law allow this (lawful bases)?

The purposes for which we process your personal data are summarized below, together with the specific grounds under the Data Privacy Laws (see sub-headings in bold) which allow us to do this:

(a) For the performance of a contract

It may be necessary for us to process your personal data to perform a contract with you relating to our financial services business or to take steps at your request prior to entering into a contract. For further details, please refer to your contractual documentation with us.

(b) For compliance with a legal obligation or acting in the public interest

As a registered entity, we are subject to a number of statutory and regulatory obligations that may require us to collect, store or disclose personal data, such as for anti-money laundering purposes or to respond to investigations or disclosure orders from the police, regulators of the DWS Group or Deutsche Bank Group entities, and tax or other public authorities (including parties outside of the Philippines).

(c) For the purposes of legitimate interests

Where necessary, we process your personal data to serve our legitimate interests or those of a third party. (The Data Privacy Laws permit this only insofar as such interests are not outweighed by a greater need to protect your privacy.) Cases where we rely on our legitimate interests to process your personal data include (but are not limited to):

- Client and vendor relationship management;
- Business analysis and development of services;
- Activities relating to information security and building security, including use of CCTV recording;
- Managing the risks and optimizing the efficiency of DWS Group operations;
- Recording of telephone lines and monitoring of electronic communications for business and compliance purposes;
- Prevention and detection of financial crime, investigation of complaints;
- Evaluating, bringing or defending legal claims;
- Audits;
- Business restructurings.

(d) On the basis of your consent

If we wish to process your personal data in a way not covered by the legal justifications above, we will need your consent. Where you give consent, you are entitled to withdraw it at any time. Note that withdrawing your consent does not render our prior handling of your personal data unlawful, and that it might have an impact on our ability to continue to provide our services to you or receive your services in the same way in future.

There are some categories of personal data that the law deems sensitive (“Sensitive Personal Information”), which may be subject to stricter rules for processing and

securing it. Information about a person's individual's race, ethnic origin, marital status, age, color, and religious, philosophical or political affiliations, or criminal record are examples. If you voluntarily provide such information to us in circumstances where this could be relevant to the services we offer you or for broader business relationship management purposes, we will take it that this constitutes your consent to use this information as appropriate. You could withdraw that consent but it may hamper our ability to maintain our business relationship.

4. Who might we share your personal data with?

Where necessary to fulfil your instructions to us and for the other purposes outlined above, we may share information about you with a range of recipients including (but not limited to) the following: credit reference agencies, background screening providers, financial institutions, funds, payment recipients, payment and settlement infrastructure providers, exchanges, regulators, courts, public authorities (including tax authorities), DWS or Deutsche Bank Group entities and service providers, professional advisors, auditors, insurers and potential purchasers of elements of our business.

These recipients could be located outside of the Philippines.

Where we need to transfer or share your personal data, we will carefully assess the legitimacy, propriety, and necessity of the data sharing. We will comply with and require the recipient to take all the data protection measures required pursuant to the Data Privacy Laws and relevant laws and regulations.

5. Will we send your personal data to other countries?

DGBSI is active globally and thus information relating to you may, in line with the purposes described above, be transferred to other countries. We may also use service providers (within the DWS or Deutsche Bank Group or third-party providers) located in another country.

Where the laws of that country do not provide a level of protection equal to or higher than that provided in the Data Privacy Laws, we require the recipient, through contractual undertaking, to apply the same level of protection as would be necessary under the Data Privacy Laws. We will also comply with the relevant requirements of the Data Privacy Laws and other applicable laws, such as obtaining your consent, where required.

6. How long will we use and keep your data for?

In general terms, we will continue to use or otherwise process your personal data if a legal basis or justification exists. We retain your personal data as long as necessary for the purposes for which we obtained it (see Section 3 above). In making decisions about how long to retain personal data, we take account of the following:

- The termination date of the relevant contract or business relationship;

- Any retention period required by law, regulation or internal policy;
- Any need to preserve records beyond the above periods to be able to deal with actual or potential audits, tax matters or legal claims.

We adhere to the retention and disposal requirements under the DWS Group's (or, to the extent applicable, Deutsche Bank Group's) policies and applicable regulations. Records and personal data that are eligible for disposal in accordance with the DWS Group's (or, to the extent applicable, Deutsche Bank Group's) master retention schedule undergo a process of vetting (such as legal holds review) and approvals before they are permanently disposed of or erased in accordance with internal procedures.

7. What data protection rights do you have?

Subject to certain exceptions and limitations, by law you have the right to:

- (a) **Be informed** whether your personal data shall be, are being, or have been processed;
- (b) **Be furnished** with information relating to the processing of your personal data, including but not limited to the: description of the personal data to be entered into our systems; purposes for which they are being or will be processed; legal basis, scope, and method of processing; recipients or classes of recipients to whom the personal data are or may be disclosed; methods utilized for automated access (if relevant); retention period; and existence of your rights as a data subject;
- (c) **Object** to the processing of your personal data;
- (d) **Access** your personal data. This includes being informed of the source(s) of your personal data, details about the recipient of your personal data, manner of their processing, reason(s) for the disclosure, and whether decisions are being made about you solely on the basis of an automated process, amongst other information;
- (e) **Correct any inaccuracies** in your personal data;
- (f) **Withdraw or order the suspension, blocking, removal or destruction** of your personal data from our processing systems;
- (g) **Be indemnified for any damages** sustained due to inaccurate, incomplete, outdated, false, unlawfully obtained or unauthorized use of personal information; and
- (h) **Obtain a copy of your personal data in an electronic or structured format**, where it is processed by electronic means and in a structured and commonly used format.

To exercise any of these rights, please write to your usual contact at DWS or the Data Protection Officer via the contact details given at the end of this Notice.

8. How we protect your personal data?

Personal data security is our top priority. We always endeavor to safeguard your personal data against unauthorized or accidental access, processing or damage. We maintain this commitment to information security by implementing appropriate physical, technical, and organizational measures to secure your personal data.

We maintain strict security to prevent unauthorized access to our systems that contain personal data. We exercise strict management over our staff members who may have access to your personal data, including but not limited to access controls applied to different positions, confidentiality obligation agreed by staff members, formulation and implementation of data privacy and information security-related policies and procedures, and data privacy and information security trainings to staff. These security measures are reviewed and updated regularly.

9. Updates to this Privacy Statement

We may update this Privacy Statement from time to time to clarify it or address changes in law or our business operations. This Privacy Statement is supplemental to the Privacy Notice of the DWS Group accessible on this website : <https://www.dws.com/footer/Legal-Resources/privacy-notice/>

We may also notify you in other ways about the processing of your personal data, such as in updates to our service documentation with you. If you have any questions regarding subsequent updates, please contact us.

10. Contact Information/Data Protection Officer

DWS Global Business Services Inc.
Compliance Department
Attention: Data Protection Officer
Email: dpo.dwsph@db.com
Address: 16th Floor Four/Neo, 31st St. cor. 4th Ave, Bonifacio Global City
Taguig City 1634 Philippines