

**KHAZANAH AMERICAS INC**  
**GENERAL DATA PROTECTION POLICY**

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**1. YOUR PRIVACY**

- 1.1 Khazanah Americas Inc. ("**KAI**", "**us**", "**we**" or "**our**") is committed to protecting your privacy and will take the relevant measures to safeguard your personal information in accordance with all applicable data privacy laws and regulations in the United States ("**Data Protection Legislation**"). This General Data Protection Policy (the "**Policy**") sets out how we use and protect the information you give us.
- 1.2 You should read this Policy carefully and ensure that you fully understand it.
- 1.3 Any of your personal data that is collected, processed or stored by us will be held by us in accordance with the Data Protection Legislation, which regulates the collection and sale of personal information. For the purposes of Data Protection Legislation, the business is Khazanah Americas Inc. of 499 Park Ave, Suite 1600 New York, NY 10022 USA.

**2. YOUR PERSONAL DATA**

**Categories of personal data**

- 2.1 We, or a service provider engaged by us, may collect and process personal data from you. The personal data collected from you (e.g., the "**data subject**") may include (but may not be limited to) personal data that falls into the following categories of data:
  - 2.1.1 name;
  - 2.1.2 personal, business, and emergency contact information (including home address, email address, phone number, gender, marital status);
  - 2.1.3 date of birth;
  - 2.1.4 signature;
  - 2.1.5 bank account details;
  - 2.1.6 national ID number or passport number (or other identification numbers as appropriate, e.g. social security number or national insurance number);
  - 2.1.7 nationality and place of birth; and
  - 2.1.8 other personal data as may be required from time to time for business purposes, including planning and management.

## **How we will collect your data**

- 2.2 We may collect and process your personal data in the ways set out below:
  - 2.2.1 We may collect and process information that you provide by filling in forms for us (whether electronic or not). This includes information (such as your email address) provided at the time of responding to any request for information from us.
  - 2.2.2 We may collect and process information that you provide us as part of a business relationship or contract.
  - 2.2.3 If you contact us, we may keep a record of that correspondence.
  - 2.2.4 We may collect and process details of your visits to our website (if any) including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access.
  - 2.2.5 We may collect and process your personal data from third parties, our business partners or from publicly-available sources.

## **3. PURPOSE OF PROCESSING AND USES MADE OF THE INFORMATION**

- 3.1 We process and use information held about you in the following ways:
  - 3.1.1 To ensure that content from our website (if any) is presented in the most effective manner for you and for your computer.
  - 3.1.2 To provide you with any information that you request from us or which we feel may interest you, including information on networking and stakeholder events organised by KAI and/or any of our group companies (which means our subsidiaries, our ultimate holding company and its subsidiaries), or any of its related and associate companies and affiliates as well as any company in which we, or any of our group companies, have an investment (together, the “**KAI Group**”), as permitted under applicable law or where you have consented to be contacted for such purposes.
  - 3.1.3 To carry out our business, including obligations arising from any contracts entered into between you and us.
  - 3.1.4 To evaluate your suitability to render the relevant services to KAI or any members of the KAI Group.
  - 3.1.5 To comply with our obligations and any requests received regarding background and security screening;
  - 3.1.6 To prepare and execute legal documents.
  - 3.1.7 To process payments and comply with our accounting and tax obligations.
  - 3.1.8 For administrative purposes.
  - 3.1.9 For contact purposes.
  - 3.1.10 To comply with our obligations regarding security and access within the KAI Group.
  - 3.1.11 To investigate complaints and suspected suspicious transactions.

3.2 Your information is necessary to us. If you do not provide all the personal data that we request from you, we may not be able to fulfil all of the functions set out in paragraph 3.1 above.

#### **4. WHERE AND HOW WE STORE AND RETAIN YOUR PERSONAL DATA**

4.1 Your personal data will be stored within the territory of the United States. We, other members of the KAI Group or any third party receiving your personal data from us may transfer your personal data outside of the United States.

4.2 We will hold your personal data for as long as necessary to fulfill the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements.

4.3 If we no longer need to use your personal data for the purposes set out in paragraph 3.1 above and/or we are not legally required to retain your personal data, we will take reasonable steps to destroy your personal data or render it anonymous.

#### **5. HOW WE SHARE, TRANSFER OR MAKE AVAILABLE YOUR PERSONAL DATA.**

5.1 We do not sell your personal information to third parties.

5.2 Unless you specify otherwise, we may disclose your personal information to:

5.2.1 any member of the KAI Group including but not limited to those located in Europe, Malaysia, Turkey, China and India; or

5.2.2 third parties in the following circumstances, including outside of the United States:

(A) in the event that KAI or a member of the KAI Group, including Khazanah Nasional Berhad, sells or buys any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets, including as part of any due diligence;

(B) if KAI or substantially all of its assets are acquired by a third party, in which case personal data held by it will be one of the transferred assets;

(C) agents, service providers and third parties who provide services relating to the purposes for which the personal data is collected and processed, including data processing services and Cloud service providers, or for the purpose of providing network or administrative services, whether or not such agents, service providers and third parties are based in the United States;

(D) any person who is under a duty of confidentiality and has undertaken to keep such data confidential; and

(E) if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or to protect the rights, property, or safety of KAI or any members of the KAI Group, our business partners or others.

- 5.3 We do not disclose your personal data to third parties other than those indicated in this Policy without your consent or opportunity to opt out.
- 5.4 However, we may disclose your personal data if required by law or in good faith, if such action is necessary to comply with any law enforcement agency requirements, court orders or legal processes.

## **6. SECURITY MEASURES**

- 6.1 We will take all reasonable precautions necessary to protect your personal data from:
  - 6.1.1 misuse, interference and loss; and
  - 6.1.2 unauthorised access, modification or disclosure.
- 6.2 We may use third party data storage providers to store personal information electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment.
- 6.3 Please note that, unfortunately, there is always risk involved in sending information through any channel over the internet. Any information you send to us over the internet is entirely at your own risk. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted over the internet and we do not warrant the security of any information, including personal data, which you transmit to us over the internet.
- 6.4 Where we transfer your personal data outside the United States and where the country or territory in question does not maintain adequate data protection standards, we will take reasonable steps to ensure that your data is treated securely and in accordance with this Policy.
- 6.5 In the event of an unauthorized data breach involving data subjects' unencrypted personal data, we will inform impacted data subjects in a timely manner in accordance with Data Protection Legislation. When it is difficult to notify a person on an individual basis, we may issue a public announcement in a reasonable and effective manner in accordance with Data Protection Legislation.

## **7. ACCESS, CORRECTIONS AND COMPLAINTS**

- 7.1 If you would like to make any inquiries or complaints about your personal data, you may contact our **Data Protection Compliance Manager** at [KAI.pdofficer@khazanah.com](mailto:KAI.pdofficer@khazanah.com).
- 7.2 If you have a concern about how we have handled your personal data, please let us know so we can fix the problem. You can contact us at any time as set out below in section 10.

If your complaint is not resolved, you can file a complaint with the Federal Trade Commission. You may file a complaint online at [www.ftc.gov](http://www.ftc.gov) or by phone by calling the FTC's Consumer Response Center at 1-877-FTC-HELP (1-877-382-4357).

## **8. PROCESSING IN LINE WITH YOUR RIGHTS**

- 8.1 You have the right to ask us not to process your personal data for marketing purposes. We will inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third

party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on certain forms we use to collect your data. You can also exercise the right at any time by contacting us at any time as set out below in section 10.

- 8.2 Our forms and websites (if any) may, from time to time, contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **9. MONITORING AND REVIEW OF POLICY**

- 9.1 KAI may review and change this Policy from time to time to reflect changes in the law, our business practices, processes or structure. This Policy is not a contract, nor does it suggest any obligation on our part with another party.

## **10. HOW TO CONTACT US**

- 10.1 Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to Data Protection Compliance Manager at [KAI.pdofficer@khazanah.com](mailto:KAI.pdofficer@khazanah.com).