Interactive Brokers Singapore Private Limited Privacy Policy Supplement

1. Introduction

Interactive Brokers Singapore Private Limited ("IBSG", "we" or "us") is bound by and acts in accordance with the Personal Data Protection Act 2012 ("PDPA"). We have produced this Policy in order to comply with the obligations under the PDPA. IBSG is part of the Interactive Brokers Group of companies ("IB Group"). The Group, including IBSG, understands that the confidentiality and security of the personal date or personal information you share with us is important and we handle all information we collect about you in accordance with this Policy. This policy supplements our Group policy, the Interactive Brokers Group Privacy Policy ("IB Group Policy") at https://www1.interactivebrokers.com/en/index.php?f=305, and provides further information about how IBSG collects, maintains, uses and discloses your personal information.

When we refer to "you" in this Policy, we are referring to our clients (who may be individuals or corporate persons), authorised persons or account signatories for clients, people and entities who are applying to open an account with us or use our services, persons associated with our clients or persons who are opening an account (including those persons about whom we are required to collect information under anti money laundering/combating of terrorist financing laws, such as beneficial owners of corporate persons, beneficiaries of trusts etc) whose personal information has been provided to us.

2. The kinds of information that IBSG collects

As outlined in the IB Group Policy, we collect your personal information when you apply to open an account with us or ask us to provide services or products. The types of personal information we collect includes: your names, addresses, dates of birth, email addresses, telephone numbers, national registration identity card ("NRIC") numbers, tax registration numbers, other government-issued identification numbers (e.g., passport numbers, driver's license numbers), marital status, employment status, annual income, net worth, trading history, investment objectives, funds deposit and transfer information.

In addition to the personal information we collect from you during account opening, we may collect information about you from public registers, including government administered databases, or other information aggregating services when we assess your application for an account, or any of the products and services we offer.

After you have opened an account with us, we may collect or verify your personal information when and if we need to update our records and when you interact with us via telephone or email.

3. How we hold personal information

Typically, we hold all personal information we collect electronically. Your personal information will be stored inside and outside of Singapore in places where we maintain electronic storage facilities. If it is stored outside Singapore, we will comply with the PDPA. The Interactive Brokers Group Cyber Security Notice at https://www1.interactivebrokers.com/en/index.php?f=18417 sets out the measures we undertake to safeguard your personal information stored electronically.

Where you have provided physical documents which contain personal information, we will hold those in Singapore in secure storage until they are returned to you or destroyed.

4. IBSG website

When you use IBSG’s website or the links from that website to pages maintained by other members of the IB Group, we collect anonymous statistical information. The information is used to evaluate website usage and for development purposes. IBSG and its affiliates use "cookies". By accessing the websites of IBSG, its affiliates within the IB Group or third-party services or information providers you acknowledge and accept the use of cookies.

5. Telephone calls

We may record the telephone conversations you have with us and our client services staff. We may be legally required to make a record of these conversations if they involve instructions to buy or sell certain
financial products.

IBSG may use such recordings in the resolution of disputes and if we do so, we will provide you a copy upon request.

6. Unsolicited information

If we receive unsolicited information from you, we will take reasonable steps to destroy it or remove it from our electronic systems. However, if that unsolicited information is co-mingled with information we have requested from you, you acknowledge that it will be handled in accordance with this policy.

7. Use of personal information

You agree and acknowledge that as we outlined in the IB Group Policy, we will use the personal information you have provided to meet our legal obligations, including to match against electronic records maintained by government bodies and third party information aggregators, and to determine your eligibility for products and services.

We do not sell your personal information to any third party and we shall comply fully with any duty or obligation of confidentiality that governs our relationship with you. We may disclose your personal information to:

- Affiliates within the Interactive Brokers Group;
- Other financial institutions or similar entities that we deal with as a result of the nature of our business or in relation to the products and services that you utilise (e.g. including third-party services or information providers accessible through Interactive Brokers Group websites, sub-custodians or other third party brokers);
- Relevant authorities such as government or law enforcement agencies; or,
- Other third parties as required by a court with jurisdiction.

8. Your obligations and rights

You are not obliged to provide us with personal information however we will not be able to offer you products and services should you choose not to. If you provide any personal information about yourself or any other person or entity to IBSG when you apply for any of our services or products, you represent and warrant that you are authorised to provide such information and that the personal information is true and accurate in all aspects.

Where you provide personal information on behalf of another person or entity, you agree to inform that person or entity of how we may use such information.

You have the right to ensure we hold correct personal information about you and you undertake, as a term of the client agreement with us, to inform us or update your account immediately should any information you have previously provided change. You also have the right to access the personal information we hold about you, see below regarding how you may do so, and make an inquiry.

9. How you may access personal information we collect about you

Clients of IBSG may access information IBSG holds about them by contacting IBSG at the IB Help Desk at https://www.interactivebrokers.com.sg/en/index.php?f=3869 or 800-101-3456 Toll free between 08:00 and 17:00 (Monday - Friday).

We aim to process all requests within 30 days, but if your request is complex we may take longer and will advise you of this.

There are no fees associated with requesting access to the information we hold about you, however IBSG reserves the right to charge you a reasonable fee for complying with your request if it involves the production of physical documents from our electronic records and the costs associated with postage. In certain legal circumstances we cannot provide you access to the information we hold about you. Where this is so we will explain to you the reasons for denying you access.

10. Revision of this Privacy Policy

We may revise this Privacy Policy from time to time for any reason. Where this Privacy Policy is revised we will upload the revised version to the website as soon as reasonably practicable.