

Privacy Notice - Singapore

This Brandywine Global Investment Management (Asia) Pte Ltd. (“Brandywine Global Singapore”) Data Protection Policy (the “Policy”) describes Brandywine Global Singapore’s practices regarding the collection, use, storage, transfer and other processing of “personal data”, other than any personal data relating to employees of Brandywine Global Singapore. The Personal Data Protection Act (“PDPA”) governs the personal data protection requirements in Singapore.

What does this privacy policy cover?

This Policy is to inform you regarding the use of your personal information which is collected from you during interactions with us either directly or through your visit to our website.

Who is responsible for the personal information collected?

Your personal data is controlled ultimately by Brandywine Global Investment Management, LLC, a limited liability company registered in the United States of America.

Personal Data

Personal data refers to data, whether true or not, about an individual who can be identified either (i) from that data or (ii) from that data in combination with other information to which the organization has or is likely to have access.

Personal data may be obtained through a variety of sources, including business cards, emails, recording of meetings or telephone calls, and account opening or application forms. Such data may be recorded and held in email folders, address books, mobile phones, hard copy files, computer drives, databases and third party systems, such as client relationship management software.

Examples of personal data include: name, National Registration Identity Card or passport number, photograph, mobile telephone number, email address, residential address, tax or other financial information, and other sensitive data.

Purposes of the collection of your data

The PDPA governs how Brandywine Global Singapore collects, uses and holds personal data. The PDPA also sets out guidance as to the handling of the personal data, including a requirement for individuals to be told that their data is being collected and stored, and the purposes for which it is being collected and stored. Brandywine Global follows the rules and guidance set out in the PDPA including the guidelines on the length of time any personal data can be held, how it can be shared and transferred and a requirement for the data that is held to be up-to-date and accurate, as well as providing you with the ability to request access to, copy and correct personal data that we hold on you, as well as to request the discontinuance of collection, use, storage and transfer of your personal data.

Broadly, in accordance with the PDPA, Brandywine Global Singapore collects, uses, holds and transfers your personal data because:

- You have provided your consent and you have been informed of the purpose for the collection, use, storage and transfer of your personal data (either within or outside of Singapore);

- The information is necessary in relation to a contract with you or because you have asked for something to be done to facilitate entering into a contract;
- We require the information to fulfil a legal or regulatory obligation (other than an obligation under a contract); or
- It is in accordance with our legitimate interests.

If you wish us to stop using your personal information for any or all of the above purposes, please contact us at privacy@brandywineglobal.com. We will stop the use of your personal information for such purposes as soon as it is reasonably possible to do so.

In addition, the collected personal data will be transferred to selected third parties, which may be located outside of Singapore as part of our services offered to you. For example, if any of our servers are located outside of Singapore or one of our service providers is located outside of Singapore.

These third parties will not use your personal information for any other purposes other than what we have agreed with them. Brandywine Global Singapore requests those third parties to implement adequate levels of protection in order to safeguard your personal information.

We respect your personal information and therefore we will take steps to ensure that your privacy rights continue to be protected if we transfer your information outside of Singapore in this way. In addition, if you use our services whilst you are outside Singapore, your information may be transferred outside Singapore in order to provide you with those services.

Except as set out in this Policy, we will not disclose any personally identifiable information without your permission unless we are legally entitled to do so (for example, if required to do so by legal process or for the purposes of prevention of fraud or other crime) or if we believe that such action is necessary to protect and/or defend our rights, property or personal safety and those of our users/customers or other individuals.

Collection of non-personal data

We may automatically collect non-personal information about you such as the type of internet browsers you use or the website from which you linked to our website. We may also aggregate details which you have submitted to the site (for example, your age and the town where you live). You cannot be identified from this information and it is only used to assist us in providing an effective service on the website. We may from time to time supply third parties with this non-personal or aggregated data for use in connection with our website.

Responsibility

All employees of Brandywine Global Singapore are responsible for the protection of personal data and for ensuring that personal data is collected, used, held, transferred, and protected in accordance with this Policy and any other legal constraints.

Security of Personal Data

All our employees must ensure that all personal data processed by Brandywine Global Singapore is kept secure. Brandywine Global Singapore has put in place certain measures to protect against unauthorized or unlawful access to, and against accidental loss or destruction of, or damage to, personal data. Some of these security measures include: restricted building access, security password access for systems and restricted access to certain information. Brandywine Global Singapore is also subject to Brandywine Global's Information Security Policy and

Access Control Policy (“Brandywine IT policies”) which includes measures to be taken to ensure the confidentiality, integrity and security of your personal information controlled or processed by Brandywine Global. All Brandywine Global employees are required to familiarize themselves with Brandywine’s IT policies and abide by them. Our employees must also abide by the client confidentiality obligations contained in the Brandywine Singapore Compliance Policies and Procedures manual and any legal agreements with you.

Sharing Personal Data

All personal data should be kept strictly confidential unless we are permitted to share the personal data as outlined in this Policy.