

GDPR Privacy Notice

We, Eastspring Investments Limited, take the privacy and protection of your personal information seriously.

So, we've set out below information about our processing of your personal information, what rights you have, and how you can get in touch if you want to know more.

When we say personal information, we mean information about you, such as your name, date of birth and contact details. We collect personal information from you that is necessary for us to either provide you with the product or service you've requested or to comply with statutory or contractual requirements. Unfortunately, if you're unable to provide certain personal information which is necessary for us to provide our products and/or services to you, we will not be able to provide you with those products and/or services.

We may change this Privacy Notice from time to time by updating our Privacy Notice page on our website. We encourage you to check our Privacy Notice from time to time on our website, as the version of our Privacy Notice which is displayed on our website takes precedence over all previous versions of our Privacy Notice.

Part A – Personal information we process

- Personal and contact details, such as title, full name, contact details and contact details history;
- your date of birth, gender and/or age;
- your nationality (if relevant to the product or service);
- details of fund investors, beneficiaries, such as joint policy holders and minor beneficiaries of our products or services;
- family members (if relevant to the product or service);
- records of your contact with us such as via the phone number of our customer service centre and, if you get in touch with us online using our online services or via our smartphone app, details such as your mobile phone location data, IP address and MAC address;
- products and services, you hold with us, as well as those you have been interested in and have held and the associated payment methods used;
- the usage of our products and services, any claims and whether those claims were paid out or not (and details related to this);
- analysis of data relating to marketing made to you, including history of communications and whether you open them or click on links;
- information about your use of products or services held with our Marketing Partners, such as insurance policies, mortgage, savings or financial services and products;
- information we obtained from third parties, including information about insurance risk, pricing, claims history, instances of suspect fraud and usage history;
- personal information which we obtain from Credit Reference Agencies and Fraud Prevention Agencies, including public (for example, defaults) and shared credit history, financial situation and financial history;

- fraud, debt and theft information, including details of money you owe, suspected instances of fraud or theft, and details of any devices used for fraud;
- criminal records information, including alleged offences;
- information about your health or if you are a vulnerable customer if you are applying for medical or life insurance;
- information about your property, such as location, value, number of rooms, property type and building work you've had done (if relevant to the product or service);
- financial details about you, such as your salary and details of other income, details of your savings, details of your expenditure, and payment method(s);
- details about all your existing borrowings and loans (if relevant to the product or service);
- information about your employment status (if relevant to the product or service);
- information about your property occupier status, such as whether you are a tenant, live with parents or are an owner occupier of the property where you live at the time of your application;
- your residency and/or citizenship status;
- your marital status, family, lifestyle or social circumstances (if relevant to the product or service). For example, the number of dependents you have or if you are a widow or widower;
- information we buy or rent from third parties, including demographic information, details of outstanding finance, marketing lists, publicly available information, and information to help improve the relevance of our products and services;
- insights about you and our customers gained from analysis or profiling of customers;
- third party transactions; such as where a person other than the account holder uses the service, information about that person and the transaction; and
- tax information (if relevant to the product or service). For example, for investment accounts.

Part B – Where we get your personal information

We'll collect personal information from the following general sources:

- from you directly, and any information from family members, associates or beneficiaries of products and services;
- information generated about you when you use our products and services;
- from a broker or other intermediary (for example, agents, distributors, business partners) who we work with to provide products or services or quote to you;
- Group companies if you already have a product with them, have applied for one or have held a one previously;
- Cookies, location services, IP addresses when you visit our website or mobile app.
- Questionnaire and contact details when you attend surveys, investor conferences, roadshows or when you update contact us form on our website;
- from other sources such as Fraud Prevention Agencies, Credit Reference Agencies, other lenders, publicly available directories and information (for example, telephone directory, social media, internet, news articles), debt recovery and/or tracing agents,

other organisations to assist in prevention and detection of crime, police and law enforcement agencies; and

- we buy or rent information about you or customers generally from third parties including demographic information, vehicle details, claims history, fraud information, marketing lists, publicly available information and other information to help improve our products and services or our business.

Part C - How we use your personal information and why

We, Eastspring Investments Limited, PCA, the Group and our Business Partners, will use the personal information you provide to us, together with other information, for the following purposes:

- the administration of our products and services, including to enable us to perform our obligations to you and to provide any relevant services as discussed with you prior to any purchase of a product or service;
- complying with any regulatory or other legal requirements;
- carrying out checks using agencies such as credit reference agencies, tracing companies, or publicly available information (See Part D for more);
- the provision of customer services - like to reply to a question, or tell you that something's changing;
- automated decision-making or profiling (see Part E for more); and
- keeping your information on record and carrying out other internal business administration.

In addition, we, Eastspring Investments Limited, PCA, the Group and our Marketing Partners, will use the personal information you provide to us, together with other information, to send you direct marketing offers by electronic and non-electronic means including by post, as well as sending you introductions to products and services from carefully selected third parties also by post. Please see part I for further details.

Some of the purposes above are necessary to allow us to perform our contractual obligations to you and to enable us to comply with applicable laws and regulation. We may also rely on legitimate interests in using and sharing your personal information for the purposes described above to improve our products and services. This allows us to explore ways to develop our business and to gain insights into how our products and services are used. If we need your consent to use your personal information for the purposes described above, we will only process your personal information if you have provided consent.

Who we share your personal information with and why

We'll share your personal information within the Group and with our Business Partners, for any of the purposes set out in this Part C. If you have a joint policy or investment, the other person may receive your personal information too. If appropriate, we may also pass on your personal information to financial crime prevention agencies, any legal, regulatory or government bodies.

We may process your personal information in a country other than the one you are resident in. To the extent we transfer your personal data, we will use appropriate safeguards and comply with the

laws of the country to which your personal information is transferred. Details of the safeguards we use are available on request.

We keep your personal information for a set amount of time

Your personal information will be stored either for as long as you (or your joint policyholder) are our customer, or longer if required by law or as is otherwise necessary. It'll always be in line with our data retention policy.

Part D - Reference checks

For certain products, we may use approved credit reference agencies, tracing companies, financial crime prevention agencies, or publicly available information, to help us to check your identity, as well as to prevent fraud and money laundering; this may include checks on your current or previous addresses. Results of these may be recorded for future reference.

These checks may also be carried out for a fund investor, joint policy holder or person(s) that you provide personal information on. Should we ever lose contact with you, we may use these agencies to verify your address to help us get back in touch.

Any transfer of your personal information will always be done securely.

Part E – We may use your personal information to make automated decisions or profile you

We, Eastspring Investments Limited, PCA, our Business Partners, and our Marketing Partners may use your personal information to make automated decisions affecting you or to conduct other profiling (for example, marketing profiling).

To the extent that we conduct such automated decision-making activity, we'll provide you with further information at the appropriate time.

Part F – Use of your sensitive personal information

For certain products or services, we'll need to process your sensitive personal information, such as information relating to health, genetics, biometric identifiers and sexual orientation. To the extent that we need your explicit consent to process this kind of personal information in the manner described in Parts C, D, and E, we will provide details of this at the point of collection and seek your consent.

Part G – You're in control

When it comes to how we use your personal information, you've got the right to:

- request a copy of your personal information for free (we may charge you for this if the request is manifestly unfounded or excessive);
- in certain circumstances request that we move your personal information to another organisation if you want us to;¹

¹ We will provide any electronic information (not paper records) that we hold and only that which you provided to us – we will not provide the results of any processing carried out on that data.

- request that we correct anything that's wrong, or complete any incomplete personal information;
- ask us to delete your personal information if it is no longer needed for the purposes set out in Part A or if there is no other legal basis for the processing;
- limit how we use your personal information or withdraw your consents (including automated decision making) you have given for the processing of your personal information;
- object to us using your personal information for direct marketing (including related profiling) or other processing based on legitimate interests; and
- complain to a data protection authority or another independent regulator about how we're using it.

If you want to do any of these things, or would like an explanation about these rights, we've explained how you can get in touch in the Contact Us section.

If you do need to speak to us, it'll be useful to have to hand that the data controller of your personal information is Eastspring Investments Limited. We may monitor or record calls or any other communication we have with you. This might be for training, for security, or to help us check for quality.

Part H – Acting on someone else's behalf?

If you give us personal information about another person (or persons), we'll take that to mean they have appointed and authorised you to act on their behalf. This includes providing consent to:

- our processing of their personal information and sensitive personal information (as we've explained in Parts A - G above); and
- you are getting any information protection notices on their behalf.

If for any reason you are concerned as to whether you are permitted to provide us with the other person's information, please contact us at the email address below before sending us anything.

Part I – Direct marketing

We, Eastspring Investments Limited, PCA, our Business Partners, and our Marketing Partners will still send you information by post about our and the Group's products and services and carefully selected third parties.

Additionally, from time to time, we, Eastspring Investments Limited, PCA, and the Group would like to contact you by electronic means with details about products, services and any special offers. We will only do this if you have consented to us contacting you by electronic means.

And if you change your mind, and / or you would like to opt-out of receiving non-electronic direct marketing, it's easy to let us know. Just use one of the options in the Contact us section.

Contact us

If you want to exercise your rights in Part G or if you require any other information about any other part of this notice, you can contact us in several different ways.

Write to us at:

Legal & Compliance
Eastspring Investments Limited
Marunouchi Park Building
2-6-1 Marunouchi, Chiyoda-ku
Tokyo 100-6905, Japan

Or visit:

Eastspring Investments Limited
Marunouchi Park Building
2-6-1 Marunouchi, Chiyoda-ku
Tokyo 100-6905, Japan

PCA means Prudential Corporation Asia Limited.

The Group means any affiliates of Ultimate Parent Company of PCA and Eastspring Investments Limited. Eastspring Investments, PCA and the Group are not affiliated in any manner with Prudential Financial, Inc, a company whose principal place of business is in the United States of America.

Business Partners means our service providers, accountants, auditors, IT service and platform providers, intermediaries, reinsurers, investment managers, agents, pension trustees (and other stakeholders), scheme advisors, introducers, selected third party financial and insurance product providers, and our legal advisers.

Marketing Partners means our service providers, intermediaries, pension trustees (and other stakeholders), scheme advisors, introducers and selected third party financial and insurance product providers.