

**BMO Global Asset Management (Asia) Limited
(including its assignees, transferees and successors, "BMO
GAM ASIA")**

NOTICE TO DATA SUBJECTS

relating to the

Personal Data (Privacy) Ordinance

(Chapter 486 of the Laws of Hong Kong) (the "Ordinance")

- a) From time to time, it is necessary for clients and various individuals (including without limitation applicants for financial services, directors, shareholders, officers and managers of corporate data subjects or applicants) (collectively "Data Subject(s)") to supply BMO GAM ASIA with personal data ("Data") in connection with various matters including the opening or continuation of accounts, the provision of advisory/management services or the provision of other services agreed from time to time between the Data Subject and BMO GAM ASIA.
- b) Failure to supply such Data may result in BMO GAM ASIA being unable to open or continue accounts or establish or continue services or facilities.
- c) Data is also collected from Data Subjects in the ordinary course of the continuation of the advisory/management relationship with BMO GAM ASIA, for example, when Data Subjects write cheques, deposit money or provide personal information in connection with their investments or investment accounts.
- d) Data relating to a Data Subject may be collected, used, processed, disclosed, transferred or stored for the following purposes (whether within or outside Hong Kong):—
- i. the processing of applications for services;
 - ii. the daily operation of the services provided to Data Subjects;
 - iii. conducting regular reviews and audits generally (including upon application for a service and upon regular or special reviews);
 - iv. designing financial services or related products for use by Data Subjects;
 - v. marketing services and products for use by corporate Data Subjects;
 - vi. determining amounts owed to or by Data Subjects;
 - vii. the enforcement of obligations of Data Subjects including, without limitation, the collection of amounts outstanding from Data Subjects;
 - viii. ensuring compliance with the requirements of any law or regulation of Hong Kong or elsewhere binding on or applying to BMO GAM ASIA, its holding company and affiliates, whether in Hong Kong or elsewhere (collectively "Group Members") or under and for the purposes of any application, direction, request, requirement, guideline or other similar document (whether or not having the force of law) issued by any competent regulatory or other authority of Hong Kong or elsewhere with which BMO GAM ASIA or any other Group Member are expected to comply;
 - ix. enabling BMO GAM ASIA or any of Group Member to comply with obligations, commitments or arrangements undertaken by BMO GAM ASIA or any of Group Member with, local or foreign bodies and authorities, whether legal, regulatory, governmental, tax, law enforcement, self-regulatory, industry or others, including but not limited to obligations or arrangements relating to information sharing and exchange for tax purposes, compliance with reporting requirements, sanctions, or prevention or detection of money laundering, terrorist financing or other unlawful activities;
 - x. enabling an actual or proposed assignee, transferee or successor of BMO GAM ASIA or of all or part of its business, assets and/or shares or an actual or proposed participant or sub-participant of BMO GAM ASIA's rights in respect of the Data Subject, to evaluate the transaction intended to be the subject of the assignment, transfer, succession, participation or sub-participation; and
 - xi. other purposes directly or indirectly relating to any of the above.
- e) Data held by BMO GAM ASIA relating to a Data Subject will be kept confidential but BMO GAM ASIA may provide such information to the following parties (whether within or outside Hong Kong) for the purposes set out in paragraph (d):—
- i. any agent, contractor or third party service provider who provides administrative, telecommunications, computer, financial intermediary, payment, debt collection, securities clearing or other services to BMO GAM ASIA in connection with the operation of its business;
 - ii. any other person under a duty of confidentiality to BMO GAM ASIA including any other Group Member which has undertaken to keep such information confidential;
 - iii. any financial institution or financial intermediary with which the Data Subject has or proposes to have dealings;
 - iv. any actual or proposed assignee, transferee or successor of BMO GAM ASIA or of all or part of its business, assets and/or shares or any actual or proposed participant or sub-participant of BMO GAM ASIA's rights in respect of the Data Subject;
 - v. government departments or other appropriate governmental or regulatory authorities within or outside of Hong Kong;
 - vi. appropriate persons in BMO GAM ASIA, any shareholder of BMO GAM ASIA, any other Group Member; and
 - vii. any person to whom GAM ASIA or any of the Group Members is under an obligation to make disclosure (A) under the requirements of any law or regulation

of Hong Kong or elsewhere binding on or applying to BMO GAM ASIA or any of the Group Members (B) under and for the purposes of any application, direction, request, requirement, guideline or other similar document (whether or not having the force of law) issued by any competent regulatory or other authorities of Hong Kong or elsewhere with which BMO GAM ASIA or any other Group Members are expected to comply, or (C) in connection with any present or future agreement, arrangement or commitment, contractual or otherwise, undertaken by BMO GAM ASIA or any of Group Members with any regulator, including but not limited to, for the purposes of compliance with its obligations or commitment undertaken in relation to any law and for compliance with sanctions, or prevention or detection of money laundering, terrorist financing or other unlawful activities.

- f) Pursuant to the Ordinance, any individual has the following rights:-
- i. the right to check whether BMO GAM ASIA holds Data about him or her and of access to such Data;
 - ii. the right to require that BMO GAM ASIA correct any Data relating to him or her which is inaccurate;
 - iii. the right to ascertain BMO GAM ASIA's policies and practices in relation to Data and to be informed of the kind of Data held by BMO GAM ASIA; and
 - iv. the right to obtain a copy of the Data.
- g) Data of a Data Subject may be collected, used, processed, stored, disclosed or transferred in and to any country or territory as BMO GAM ASIA or any person who has obtained such Data from BMO GAM ASIA (as referred to in paragraph (e) above) considers appropriate. Such Data may also be disclosed in accordance with the local practices and the laws or regulations in such country or territory. Disclosure or

transfer made pursuant to this Notice may be made to recipients in a jurisdiction other than that of the disclosing party or a jurisdiction that may not necessarily provide an equivalent level of protection for Data as the Data Subject's home jurisdiction.

- h) Unless written notice to the contrary is provided to BMO GAM ASIA, a Data Subject will be deemed to have acknowledged and consented to such collection, use, processing, storage, disclosure or transfer of Data as described in paragraphs d., e. and g. above. A Data Subject may revoke this consent by written notice to BMO GAM ASIA. Each Data Subject acknowledges that BMO GAM ASIA may be unable to open, continue or establish accounts or provide advisory/management services or other services or facilities without the consents described above.
- i) For any personal data provided by corporate Data Subjects to BMO GAM ASIA, whether such personal data pertains to employees, clients, customers or any other individuals (each an "Individual"), the Data Subject hereby represents to BMO GAM ASIA that each Individual whose personal data is disclosed by the Data Subject to BMO GAM ASIA has consented to the collection, use, processing, disclosure, transfer or storage of such personal data for the purposes set out in the Notice.
- j) In accordance with the Ordinance, BMO GAM ASIA is entitled to charge a reasonable fee for the processing of any request for access to Data.
- k) Requests for access to, or correction of, Data or for information regarding policies and practices and kinds of Data should be sent in writing to:-

Compliance Department
BMO Global Asset Management (Asia) Limited

Unit 3004
Two Exchange Square
8 Connaught Place, Central
Hong Kong

Email: DPO@columbiathreadneedle.com

- l) The contents of this Notice shall apply to all Data Subjects and form part of any contract for services that the Data Subjects have or may enter into with BMO GAM ASIA from time to time. If there is any inconsistency or discrepancy between this Notice and the relevant contract, this Notice shall prevail insofar as it relates to the protection of the Data Subjects' personal data.
- m) Nothing in this Notice shall limit the rights of Data Subjects under the Ordinance.

Nov 2021