

Privacy Policy

BACKGROUND:

Milltrust International Group understands that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who visits this website, www.milltrust.com ("Our Site") and will only collect and use personal data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is requested when you confirm your eligibility to access Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Policy, the following terms shall have the following meanings:

"Account" means an account required to access and/or use certain areas and features of Our Site;

"Cookie" means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in Part 13, below;

"Milltrust International Group" means Milltrust International Group (Singapore) Pte. Ltd, a limited company registered in the Republic of Singapore under company number 201026816M, whose registered address is 9 Raffles Place, #27-00 Republic Plaza, Singapore 048619, and whose main trading address is 77B Tras Street, Singapore, 079016; and

"Personal data" means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation ("GDPR"); and

"We/Us/Our" means Milltrust International Group, and the following group companies:



Milltrust International LLP, a limited liability partnership registered in England under company number OC344800, whose registered address is 5 Market Yard Mews, 194-204 Bermondsey Street, London SE1 3TQ, United Kingdom; and

Milltrust Ventures Pte Ltd., a company incorporated under the laws of Singapore (UEN: 202014675D), whose registered office is 77B Tras Street, Singapore, 079016.

2. Information About Us

2.1 Our Site is owned and operated by Milltrust International Group (Singapore) Pte. Ltd.

2.2 We can be contacted by email at info@milltrust.com, by telephone on +65 6225 3052 or +44 20 8638 0513, or by post at 77B Tras Street, Singapore, 079016 or 5 Market Yard Mews, 194-204 Bermondsey Street, London SE1 3TQ, United Kingdom.

2.3 Milltrust International LLP is authorised and regulated by the Financial Conduct Authority (FRN: 505716). Milltrust Ventures Pte Ltd is a subsidiary of Milltrust International Group (Singapore) Pte. Ltd and is registered with the Monetary Authority of Singapore as a Venture Capital Fund Management Company (VCFM).

3. What Does This Policy Cover?

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. What Is Personal Data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") and the Data Protection Act 2018 (collectively, "the Data Protection Legislation") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'.

Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

5. Your Rights

5.1 Under the Data Protection Legislation, you have the following rights, which We will always work to uphold:

5.1.1 The right to be informed about Our collection and use of personal data; This Privacy Policy should tell you everything you need to know, but you can always contact Us to find out more or to ask any questions using the details in Part 16.

5.1.2 The right to access the personal data We hold about you. Part 14 will tell you how to do this.

5.1.3 The right to have your personal data rectified if any of your personal data held by Us is inaccurate or incomplete. Please contact Us using the details in Part 16 to find out more.

5.1.4 The right to be forgotten – i.e. the right to ask Us to delete or otherwise dispose of any of your personal data that We hold. Please contact Us using the details in Part 16 to find out more.

5.1.5 The right to restrict (i.e. prevent) the processing of your personal data;

5.1.6 The right to object to Us using your personal data for a particular purpose or purposes.

5.1.7 The right to withdraw consent. This means that, if We are relying on your consent as the legal basis for using your personal data, you are free to withdraw that consent at any time.

5.1.8 The right to data portability. This means that, if you have provided personal data to Us directly, We are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask Us for a copy of that personal data to re-use with another service or business in many cases.

5.1.9 Rights with respect to automated decision making and profiling. We do not use your personal data in this way.

5.2 It is important that your personal data is kept accurate and up-to-date. If any of the personal data We hold about you changes, please keep Us informed as long as We have that data.

5.3 If you have any cause for complaint about Our use of your personal data, please contact Us using the details provided in Part 16 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

5.4 For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.



6. What Data Do We Collect?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data:

- 6.1 name;
- 6.2 business/company name
- 6.3 job title;
- 6.4 contact information such as email addresses and telephone numbers;
- 6.5 demographic information such as postcode;
- 6.6 IP address;
- 6.7 web browser type and version;
- 6.8 operating system; and
- 6.9 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

7. How Do We Use Your Data?

7.1 All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the Data Protection Legislation at all times. For more details on security see Part 9, below.

7.2 Our use of your personal data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your personal data (e.g. by subscribing to emails), or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:

- 7.2.1 Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- 7.2.2 Personalising and tailoring Our services for you;
- 7.2.3 Replying to emails from you;
- 7.2.4 Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by checking the “unsubscribe” link in our emails.

7.3 With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email or telephone, or post with information and news on Our services. We will not, however, send you any unsolicited marketing or spam. We will always work to fully protect your rights and comply with Our obligations under the Data Protection Legislation and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.



7.4 We will only use your personal data for the purpose(s) for which it was originally collected unless We reasonably believe that another purpose is compatible with that or those original purpose(s) and need to use your personal data for that purpose. If We do use your personal data in this way and you wish Us to explain how the new purpose is compatible with the original, please contact Us using the details in Part 16.

7.5 If We need to use your personal data for a purpose that is unrelated to, or incompatible with, the purpose(s) for which it was originally collected, We will inform you and explain the legal basis which allows Us to do so.

7.6 In some circumstances, where permitted or required by law, We may process your personal data without your knowledge or consent. This will only be done within the bounds of the Data Protection Legislation and your legal rights.

8. How Long Will You Keep Your Personal Data?

8.1 We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will, therefore, be retained for the following periods (or its retention will be determined on the following bases):

8.1.1 Where there is a legal or regulatory requirement to retain data for a specific period, we will retain your data only for as long as prescribed by these requirements;

8.1.2 If you ask to delete your personal data, and there is no legal or regulatory requirement to retain this data, we will do so within 7 days of receiving your request.

9. How and Where Do We Store Your Data?

9.1 We only keep your personal data for as long as We need to in order to use it as described above in Part 7, and/or for as long as We have your permission to keep it.

9.2 Some or all of your personal data may be stored in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that We will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the Data Protection Legislation.

9.3 We share and store your data within the group of companies of which We are a part. Where this involves the transfer of personal data outside the EEA,



Our group ensures that personal data is protected by requiring all companies within the group to follow the same rules with respect to personal data usage. These are known as “binding corporate rules”. More information on binding corporate rules is available from the [European Commission](#).

9.4 We may share your data with external third parties that are based outside the EEA. We will only transfer your personal data to third countries whose levels of data protection are deemed ‘adequate’ by the European Commission. More information is available from the [European Commission](#).

9.5 The security of your personal data is essential to Us, and to protect your data, We take a number of important measures, including the following:

9.5.1 limiting access to your personal data to those employees, agents, contractors, and other third parties with a legitimate need to know and ensuring that they are subject to duties of confidentiality;

9.5.2 procedures for dealing with data breaches (the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, your personal data) including notifying you and/or the Information Commissioner’s Office where We are legally required to do so.

10. Do We Share Your Personal Data?

10.1 We share your data with the other companies in Our group listed under definitions above.

10.2 We may sometimes contract with third parties to supply services to you on Our behalf. These may include payment processing, search engine facilities, advertising, and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.

10.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

10.4 We may sometimes use third-party data processors that are located outside the EEA. Where We transfer any personal data outside the EEA, We will



take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the Data Protection Legislation.

10.5 In certain circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

11. What Happens If Our Business Changes Hands?

11.1 We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

11.2 In the event that any of your data is to be transferred in such a manner, you will not be contacted in advance and informed of the changes. You will retain the option to have your data deleted or withheld from the new owner or controller.

12. How Can You Control Your Personal Data?

12.1 In addition to your rights under the Data Protection Legislation, set out in Part 5, when you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details).

12.2 You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service (“the TPS”), the Corporate Telephone Preference Service (“the CTPS”), and the Mailing Preference Service (“the MPS”). These may help to prevent you from receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receive.

13. Your Right to Withhold Information



13.1 You may access certain areas of Our Site without providing any data at all. However, to use all features and functions available on Our Site you may be required to submit or allow for the collection of certain data.

13.2 You may restrict Our use of Cookies. For more information, see Part 15.

14. How Can You Access Your Personal Data?

14.1 If you want to know what personal data We hold about you, you can ask Us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a “subject access request”.

14.2 All subject access requests should be made in writing and sent to the email or postal addresses shown in Part 16.

14.3 There is not normally any charge for a subject access request. If your request is ‘manifestly unfounded or excessive’ (for example, if you make repetitive requests) a fee may be charged to cover Our administrative costs in responding.

14.4 We will respond to your subject access request within 21 days and, in any case, not more than one month of receiving it. Normally, We aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of three months from the date We receive your request. You will be kept fully informed of Our progress.

15. Our Use of Cookies

15.1 Our Site may place and access certain first-party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these Cookies and have taken steps to ensure that your privacy and personal data is protected and respected at all times.

15.2 All Cookies used by and on Our Site are used in accordance with current Cookie Law.

15.3 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.



15.4 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are shown below in Part 15.5. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in Part 15.6, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.

15.5 The following first-party Cookies may be placed on your computer or device:

Cookie name	Purpose	Strictly Necessary
Google Analytics	Helps us track visitors to our site.	No
Google Tag Manager	Helps us understand what parts of the site people are visiting.	No

15.6 In addition to the controls that We provide, you can choose to enable or disable Cookies in your internet browser. Most internet browsers also enable you to choose whether you wish to disable all Cookies or only third party Cookies. By default, most internet browsers accept Cookies but this can be changed. For further details, please consult the help menu in your internet browser or the documentation that came with your device.

15.7 You can choose to delete Cookies on your computer or device at any time, however, you may lose any information that enables you to access Our Site more quickly and efficiently including, but not limited to, login and personalisation settings.

15.8 It is recommended that you keep your internet browser and operating system up-to-date and that you consult the help and guidance provided by the developer of your internet browser and manufacturer of your computer or device if you are unsure about adjusting your privacy settings.

16. Contacting Us

If you have any questions about Our Site or this Privacy Policy, or with anything to do with your personal data and data protection, including making a subject access request, please contact Us by email at info@milltrust.com, by telephone on +65 6225 3052 or +44 20 8638 0513, or by post at 77B Tras Street, Singapore, 079016 or 5 Market Yard Mews, 194-204 Bermondsey Street, London, SE1 3TQ, United Kingdom. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you (as under Part 14, above).

17. Changes to Our Privacy Policy

Milltrust International LLP
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Milltrust International LLP is authorised and regulated by the Financial Conduct Authority



17.1 We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if We change Our business in a way that affects personal data protection.

17.2 Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date. This Privacy Policy was last updated on 11 October 2024.

Milltrust International Group (Singapore) Pte. Ltd
October 2024