

# MILESTONE.Y ADVISORY LIMITED

## PRIVACY POLICY

MILESTONE.Y ADVISORY LIMITED (hereinafter referred to as "MYA") is dedicated to protecting the confidentiality and privacy of information entrusted to it. As part of this fundamental obligation, MYA is committed to the appropriate protection and use of personal information (sometimes referred to as "personal data", "personally identifiable information" or "PII") that has been collected online.

Generally, our intent is to collect only the personal information that is provided voluntarily by online visitors so that we can offer information and/or services to those individuals or offer information about employment opportunities.

### 1. Collection and use of personal information

#### 1.1 What information we collect

We obtain personal information about you if you choose to provide it — for example, your contact information if used to contact mailboxes or to register for certain services. In some cases, you will have previously provided your personal information to MYA.

If you choose to register or login to a MYA website using a third party single sign-in service that authenticates your identity and connects your social media login information (e.g., Linked-in, Google, Facebook or Twitter) with MYA, we will collect any information or content needed for the registration or log-in that you have permitted the social media provider to share with us, such as your name and email address. Other information we collect will depend on the privacy settings you have set with your social media provider, so please review the Privacy Policy or policy of the applicable service.

### 1.2 Automatic collection of personal information

In some instances, MYA and its service providers uses cookies, web beacons and other technologies to automatically collect certain types of information when you visit us online, as well as through emails that we may exchange. The collection of this information allows us to customize your online experience, improve the performance, usability and effectiveness of MYA's online presence, and to measure the effectiveness of our marketing activities.

### 1.2.1 IP addresses



An IP address is a number assigned to your computer whenever you access the internet. It allows computers and servers to recognise and communicate with one another. IP addresses from which visitors appear to originate will be recorded for IT security and system diagnostic purposes. This information will also typically be used in aggregate form to conduct website trend and performance analysis.

### 1.2.2 Cookies

Cookies will typically be placed on your computer or internet-enabled device whenever you visit us online. This allows the site to remember your computer or device and serve a number of purposes.

On some of our websites, a notification banner will appear requiring your consent to collect cookies. If you do not provide consent, your computer or internet-enabled device will not be tracked for marketing-related activities. A secondary type of cookie referred to as "user-input" cookies may still be required for necessary functionality. Such cookies will not be blocked through the use of this notification banner. Your selection will be saved in a cookie and is valid for a period of 90 days. If you wish to revoke your selection, you may do so by clearing your browser's cookies.

Although most browsers automatically accept cookies, you can choose whether or not to accept cookies via your browser's settings (often found in your browser's Tools or Preferences menu). You may also delete cookies from your device at any time. However, please be aware that if you do not accept cookies, you may not be able to fully experience some of our web sites' features.

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Below is a	list of the	types of	COOKIES	used on	our web sites:	

Purpose	Description	Type & Expiry
Performance (i.e., User's Browser)	Our web sites are built using common internet platforms. These have built-in cookies which help compatibility issues (e.g., to identify your browser type) and improve performance (e.g., quicker loading of content).	Session deleted upon closing the browser, or persistent.
Security Cookies	If you register for access to a restricted area, our cookies ensure that your device is logged for the duration of your visit. You will need your username and password to access the restricted areas.	Session deleted upon closing the browser, or persistent.



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Site Preferences	Our cookies may also remember your site preferences (e.g., language) or seek to enhance your experience (e.g., by personalizing a greeting or content). This will apply to areas where you have registered specifically for access or create an account.	Session deleted upon closing the browser, or persistent.
Analytical	We use several third party analytic tools to help us understand how site visitors use our web site. This allows us to improve the quality and content on MYA.com for our visitors. The aggregated statistical data cover items such as total visits or page views, and referrers to our web sites. For further details on our use of Google Analytic.	Persistent, but will delete automatically after two years if you no longer visit MYA.com
Social sharing	We use third party social media widgets or buttons to provide you with additional functionality to share content from our web pages to social media websites and email. Use of these widgets or buttons may place a cookie on your device to make their service easier to use, ensure your interaction is displayed on our web pages (e.g. the social share count cache is updated) and log information about your activities across the Internet and on our web sites. We encourage you to review each provider's privacy information before using any such service. For further details on our use of social media widgets and applications.	Persistent, but will be deleted automatically after two years if you no longer visit MYA.com

Other third party tools and widgets will be used on our individual web pages from time to time to provide additional functionality. Depending on how you set your preferences in your browser and/or the cookie banner, use of these tools or widgets will typically place a cookie on your device to make their service easier to use, and ensure your interaction is displayed on our webpages properly.



Cookies by themselves do not tell us your email address or otherwise identify you personally. In our analytical reports, we will obtain other identifiers including IP addresses, but this is for the purpose of identifying the number of unique visitors to our web sites and geographic origin of visitor trends, and not to identify individual visitors.

### 1.2.3 Web beacons

A web beacon is a small image file on a web page that can be used to collect certain information from your computer, such as an IP address, the time the content was viewed, a browser type, and the existence of cookies previously set by the same server. MYA only uses web beacons in accordance with applicable laws.

MYA or its service providers will use web beacons to track the effectiveness of third party web sites that provide us with recruiting or marketing services or to gather aggregate visitor statistics and manage cookies.

You have the option to render some web beacons unusable by rejecting their associated cookies. The web beacon may still record an anonymous visit from your IP address but cookie information will not be recorded.

In some of our newsletters and other communications, we will monitor recipient actions such as email open rates through embedded links within the messages. We collect this information to gauge user interest and to enhance future user experiences.

### 1.2.4 Location-based tools

MYA will collect and use the geographical location of your computer or mobile device. This location data is collected for the purpose of providing you with information regarding services which we believe may be of interest to you based on your geographic location, and to improve our location-based products and services.

### 1.3 Social media widgets and applications

MYA websites will typically include functionality to enable sharing via third party social media applications, such as the Facebook Like button or X widget. These social media applications will collect and use information regarding your use of MYA websites (see details on 'Social Sharing' cookies above). Any personal information that you provide via such social media applications will often be collected and used by other members of that social media application and such interactions are governed by the privacy policies of the companies that provide the application. We do not have control over, or responsibility for, those companies or their use of your information.

In addition, MYA websites may host blogs, forums, crowd-sourcing and other applications or services (collectively "social media features"). The purpose of social media features is to facilitate the sharing of knowledge and content. Any personal information that you provide on any MYA social media feature will typically be shared with other users of that social media



feature (unless otherwise stated at the point of collection), over whom we often have limited or no control.

### 2. How We Use Your Personal Information

When you register or submit personal information to MYA, we will use this information only for the purposes for which it is collected and in the manner outlined in this Privacy Policy Your personal information is not used for other purposes, unless we obtain your permission, or unless otherwise required or permitted by law or professional standards. For example, if you register to a MYA website and provide information about your preferences we will use this information to personalize your user experience. Where you register or login using a third party single user sign-in we may also recognize you as the same user across any different devices you use and personalize your user experience across other MYA websites you visit. If you send us a resume or curriculum vitae (CV) to apply online for a position with MYA, we will use the information that you provide to match you with available MYA job opportunities.

In some cases where you have registered for certain services we will store your email address temporarily until we receive confirmation of the information you provided via an email (i.e. where we send an email to the email address provided as part of your registration to confirm a subscription request).

### 3. The legal grounds we have to use your personal information

MYA generally collects only the personal information necessary to fulfill your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

The law in Singapore allows us to process personal information, so long as we have a ground under the law to do so. It also requires us to tell you what those grounds are. As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract**: this is when the processing of your personal information is necessary in order to perform our obligations under a contract;
- Legal obligation: this is when we are required to process your personal information in order to comply with a legal obligation, such as keeping records for tax purposes or providing information to a public body or law enforcement agency;
- **Legitimate interests**: we will process information about you where it is in our legitimate interest in running a lawful business to do so in order to further that business, so long as it doesn't outweigh your interests; or
- Your consent: in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting MYA at info@milestoney.com.

Examples of the 'legitimate interests' referred to above are:



- To offer information and/or services to individuals who visit our website or offer information about employment opportunities.
- To prevent fraud or criminal activity and to safeguard our IT systems.
- To customize individuals' online experience and improve the performance usability and effectiveness of MYA's online presence.
- To conduct, and to analyze, our marketing activities.
- To meet our corporate and social responsibility obligations.
- To exercise our fundamental rights in the EU under Articles 16 and 17 of the Charter of Fundamental Rights, including our freedom to conduct a business and right to property.

In some cases, the personal data that we collect will also include special categories of data, such as diversity related information (including data about racial and ethnic origin, political opinions, religious beliefs and other beliefs of a similar nature, trade union membership and data about sexual life and sexual orientation), or health data and data about alleged or proven criminal offences in each case where permitted by law.

### 4. Sharing and transfer of personal information

### 4.1 Transfer within the global organization of MYA firms

We share information about you with other firms in the MYA global organization as part of international engagements, and with MYA International Limited, its related entities and other MYA firms where required or desirable to meet our legal and regulatory obligations around the world. Other parts of the MYA organization are also used to provide services to us and you, for example hosting and supporting IT applications, provision of certain forms of insurance for MYA firms and their clients, performing client conflicts checks and Anti-Money Laundering checks, assisting with client engagement services and otherwise as required in order to continue to run MYA's business.

### 4.2 Transfers to third parties

We do not share personal information with third parties, except as necessary for our legitimate professional and business needs, to carry out your requests, and/or as required or permitted by law or professional standards. For more information on such third parties, please see this. In addition, MYA will transfer certain personal information outside of the EEA to outside companies working with us or on our behalf for the purposes described in this Privacy Policy. MYA will also typically store personal information outside of the EEA. If you wish to know to which countries we may send your information, please write to info@milestoney.com. If we do this your personal information will continue to be protected by means of contracts we have in place with those organizations.

MYA will not transfer the personal information you provide to any third parties for their own direct marketing use.



# 5. Choices

In general, you are not required to submit any personal information to MYA, but we will require you to provide certain personal information in order for you to receive additional information about our services and events. MYA will also ask for your permission for certain uses of your personal information, and you can agree to or decline those uses. If you opt-in for particular services or communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in each communication. If you decide to unsubscribe from a service or communication, we will try to remove your information promptly, although we may require additional information before we can process your request.

As described in "Cookies" above, if you wish to prevent cookies from tracking you as you navigate our websites, you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Note, however, that some portions of our websites may not work properly if you elect to refuse cookies.

## 6. Data security and integrity

MYA has reasonable security policies and procedures in place to protect personal information from unauthorized loss, misuse, alteration, or destruction. Despite MYA's best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information.

We also make reasonable efforts to retain personal information only for so long i) as the information is necessary to comply with an individual's request, ii) as necessary to comply with legal, regulatory, internal business or policy requirements, or iii) until that person asks that the information be deleted. The period for which data is retained will depend on the specific nature and circumstances under which the information was collected; however, subject to the requirements of i)-iii) above, personal information will not be retained for more than 7 years.

### 7. Links to other websites

Please be aware that MYA websites will typically contain links to other websites, including websites maintained by other MYA firms that are not governed by this Privacy Policy but by other Privacy Policies that will often differ somewhat. We encourage users to review the privacy policy of each website visited before disclosing any personal information.

### 8. Privacy Policy revisions

When we modify this Privacy Policy we will post it here with an updated date.

### 9. Policy questions and enforcement

MYA is committed to protecting the online privacy of your personal information. If you have questions or comments about our administration of your personal information, please contact us



at info@milestoney.com. You may also use this address to communicate any concerns you may have regarding compliance with our Privacy Policy.