

Personal Data Protection and Privacy Notice

1. Introduction

Astute Fund Management Berhad (“Astute”, “we”, “our”, or “us”) respects your privacy and is committed to protecting your personal data.

This Personal Data Protection and Privacy Notice (“Notice”) explains how we collect, use, disclose, store, retain, and protect your personal data in accordance with the Personal Data Protection Act 2010 (Act 709), as amended from time to time, including the Personal Data Protection (Amendment) Act 2024 (collectively referred to as the “PDPA”).

This Notice applies to all individuals whose personal data is processed by Astute, including investors, prospective investors, business partners, website users, and any other individuals who interact with us.

As a data controller under the PDPA, Astute is committed to ensuring that personal data is processed lawfully, fairly, and transparently. We implement appropriate technical, organizational, and administrative measures to safeguard personal data against unauthorized access, disclosure, alteration, loss, misuse, or destruction.

We may process and disclose your personal data where:

- You have provided your consent;
- The disclosure is required or permitted under applicable laws and regulations;
- The disclosure is necessary for the prevention, detection, or investigation of crime;
- The disclosure is required by a court order, regulatory authority, or governmental body; or
- The disclosure is otherwise permitted under the PDPA.

By providing your personal data to us or by continuing to use our products, services, or website, you acknowledge that you have read and understood this Notice and consent to the processing of your personal data in accordance with its terms.

Astute may revise this Notice from time to time to reflect changes in legal, regulatory, operational, or business requirements. Any updates will be published on our website, and the latest version shall supersede all previous versions.

2. Collection of Personal Data

We may collect and process personal data relating to you, including but not limited to:

- Full name, date of birth, identification or passport number, nationality, gender, marital status, residential and correspondence addresses;
- Contact information, including telephone number, mobile number, and email address;
- Employment and occupation details, including employer information;
- Financial information, including income details, assets, liabilities, net worth, bank account information, and investment-related information;
- Information relating to family members, nominees, beneficiaries, authorized persons, or emergency contacts;
- Biometric information, such as facial images or fingerprints, where required for identity verification purposes;
- Information obtained through correspondence, enquiries, complaints, surveys, events, seminars, or other interactions with Astute; and
- Any other information reasonably required for the provision of our products, services, and business operations.

Where indicated, the provision of personal data is mandatory. Failure to provide the required personal data may result in our inability to process your application, provide our products and services, comply with regulatory obligations, or communicate with you effectively.

3. Sources of Personal Data

We may collect personal data directly from you or from authorized third parties through various channels, including:

- Application forms, account opening documents, and investment-related documentation;
- Online forms submitted through our website;
- Correspondence via email, telephone, messaging platforms, or written communications;
- Meetings, events, seminars, and other interactions with Astute representatives;
- Publicly available sources where permitted by law;
- Referrals from authorized intermediaries, agents, distributors, business partners, or professional advisers;
- Information provided by regulatory authorities, government agencies, financial institutions, or service providers; and
- Any other lawful sources from which personal data may be obtained.

By providing personal data relating to another individual, you confirm that you have obtained the necessary consent or authority to disclose such information to Astute and for Astute to process the information in accordance with this Notice.

4. Purposes of Processing Personal Data

Astute may collect, use, process, and disclose your personal data for purposes including, but not limited to, the following:

Provision of Products and Services

- Processing applications for investment products and services;
- Managing subscriptions, redemptions, transfers, switches, and other investment transactions;
- Maintaining investor records and account administration;
- Providing customer support and responding to enquiries, requests, and complaints.

Regulatory and Legal Compliance

- Complying with applicable laws, regulations, guidelines, directives, and industry requirements;
- Conducting customer due diligence, identity verification, and anti-money laundering and counter-financing of terrorism checks;
- Meeting reporting, audit, and regulatory obligations imposed by relevant authorities.

Relationship Management and Communications

- Communicating with investors regarding their accounts, investments, transactions, and service updates;
- Providing notices, disclosures, statements, reports, and other relevant information;
- Managing and administering our business relationship with you.

Marketing and Business Development

- Providing information on products, services, events, seminars, and promotional activities that may be relevant to you;
- Conducting market research, surveys, and customer satisfaction assessments;
- Developing, improving, and enhancing our products and services.

Risk Management and Business Operations

- Preventing, detecting, and investigating fraud, financial crime, misconduct, or other unlawful activities;
- Managing operational, legal, regulatory, and reputational risks;
- Maintaining internal records and business administration;
- Protecting Astute's legal rights and interests.

Other Legitimate Purposes

- Any purpose directly related or incidental to the above purposes; and
- Any other purpose for which your consent has been obtained or that is otherwise permitted under applicable laws.