

Data Privacy Notice

Sotravic Limitee

Welcome

The Data Privacy Notice demonstrates Sotravic Limitee's commitment (including its subsidiaries and affiliated entities) ("the Group") ("we", "us" or "our") to protecting your personal and sensitive data. The Group respects your privacy and this Data Privacy Notice supplements other previous data protection procedures and policies.

Purpose of the Data Privacy Notice

The purpose of the Data Privacy Notice is to clearly provide you with information on how the Group collects, uses, processes and discloses your personal and sensitive data. We will inform you how we safeguard your personal and sensitive data when you visit our corporate website whilst informing you how the law protects you together with your data privacy rights.

The Group reserves the right to amend this Data Privacy Notice by updating the Data Privacy page on the Corporate website.

Data Controller

The Group is compliant to the GDPR, data protection laws and regulations as the Group resides in Mauritius. The Data Controller of the Corporate Website and of your personal data is the Group.

Under the General Data Protection Regulation ("GDPR") and data protection laws we have appointed a Data Protection Officer who is responsible for the compliance to this Data Privacy Notice.

The Group encourages any questions on data privacy and this Data Privacy Notice, which includes any requests to exercise your legal rights as a data subject. In doing so, address any questions to our Data Protection Officer:

Baker Tilly

Email: Sotravic@bakertilly.mu

Tel: +230 460 8800

By writing: 1st Floor, CyberTower One, Ebene
72201, Mauritius

Your Data Rights

The GDPR and Data Protection Act 2017 provides that you, as a data subject, has a series of rights, namely the right:

- Of access to and copies of personal and sensitive data we hold;
- To rectify personal and sensitive data where it is inaccurate;
- To object to the processing of the data if it causes you distress or harm;

- To safely and securely transfer your personal and sensitive data which you have provided us in an easily readable format which include the specific purpose that you wish for the personal and sensitive data to be transmitted to another Data Controller; and
- Not to be subject to automated marketing decisions.

We have the discretion to refuse a request where an exception applies under the GDPR and data protection laws. All information shared with the Group is shared under the knowledge that the Group comprises of regulated licensed companies and under these licenses and regulations we are obligated to process, share and retain with certain authorities the information of our clients in a lawful manner.

Should you wish to exercise your legal rights as a data subject, or raise a complaint relating to data privacy, we would appreciate you contact our Data Protection Officer so that, in the first instance, we are able to address your concerns:

Baker Tilly

Email: Sotravic@bakertilly.mu

Tel: +230 460 8800

**By writing: 1st Floor, CyberTower One, Ebene
72201, Mauritius**

Where you are not satisfied with our data processing methods of your personal and sensitive data, you have the right to lodge a complaint to the Regulator in the jurisdiction to which you are located.

Data Collection

Personal data means any information about an individual from which that person can be identified.

We collect, use, store and transfer all types of personal data which can be grouped as:

Contact Information	E-mail address, home address, business address and telephone numbers.
Identity Information	First name, middle names and last name, aliases, date of birth, nationality, tax status information, source of wealth and funds, bank account information, educational, employment, affiliations with legal entities, family or personal information and interests.
Marketing and Communications Information	Your marketing and communication preferences when receiving marketing material from us.
Professional Information	Information relating to our range of professional services, tendering, legal, contractual and business development obligations. Due diligence data, money laundering, terrorist financing and proliferation risk profile assessments which we collect in the course of providing our professional services to you.
Special Categories / Sensitive Information	Race, ethnicity, religious, philosophical beliefs, sexual orientation, political opinions, trade union membership, genetic, health and biometric data, criminal convictions and offences.

Technical Information	Internet protocol (IP) address browser, time zone setting and location, browser plug-in, technical operating systems and other technology on devices which is used to access our corporate website.
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Data Collection Methods

We use various methods to collect personal information from you and about you which is required under the law and during the course of using our services:

- Direct interactions - as an individual, a Company or through an intermediary, an agent, adviser, intermediary or custodian of your assets. You may complete a form, correspond with us by e-mail, phone, post, SMS, fax or other forms of electronic communications whereby contact and identity information to be provided to us.
- Submitting an enquiry – which relates to our scope of services from within the Group.
- Tendering procedure – where the Group requires mandatory information to procure and complete the legal, technical and non-technical procedures.
- Business development – at the point an application form or other form is completed by you or on your behalf.
- Background Verification Checks – where third parties and openly available public sources are used to process and conduct these checks on you and your associations.
- Requesting our Newsletter be sent to you.
- Automated interactions using cookies.
- Technical information about your equipment when browsing actions and patterns.

How we process and use your Personal Data

We will only use and process your personal data including sensitive information (where applicable) when the law permits us to do so in a lawful manner. In the event that the Group processes your data for any other reasons which has not been mentioned below, the Group shall ask for your consent before processing and sharing your data.

Commonly, personal data is used and processed in the following set of circumstances:

Performance of a Contract	<p>Where we interact with you, your advisors or representatives prior to entering into a client relationship with you.</p> <p>We use your personal information to:</p> <ol style="list-style-type: none"> a. provide you with details of the scope of services the Group offers as set out in our engagement terms; b. handle a complaint or feedback from you to which we will respond to; c. for any other purposes for which you have contacted us and provided us with your personal information.
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	<p>We will transfer or share your personal information with:</p> <ol style="list-style-type: none"> a. the authorized advisers, intermediaries or custodians of your assets which you have informed us of; b. the Group including third parties in order to provide you with the range of services you require; c. the Group's team of advisors and intermediaries – administration, sales and marketing, tendering and infrastructure team, accounting, legal services, or another purpose to which you require; d. the Group's data storage partners; e. with the Regulators and any other authorities where the laws and regulations require us to do so.
<p>Legitimate Interests</p>	<p>Where it is mandatory for our legitimate interests or of another party for:</p> <ol style="list-style-type: none"> a. marketing and communications; b. continuous training and monitoring the performance of our employees in the Group; c. internal administration and management of our Group; d. seeking legal advice on our rights. <p>We will transfer or share your personal information with:</p> <ol style="list-style-type: none"> a. our authorized employees, sub-contractors, advisers, intermediaries, agents or other third parties who process data on our behalf; b. the Group's data storage partners.
<p>Marketing and Communications Information</p>	<p>We will provide you with our marketing and communication information regarding the range of services our Group provides, namely:</p> <ol style="list-style-type: none"> a. newsletters; b. invitations to corporate functions; c. regulatory and legal updates; d. updates on the Group's range of services; <p>references when receiving marketing material from us.</p> <p>We will share and transfer to you our marketing and communication information by:</p> <ol style="list-style-type: none"> a. E-mail b. SMS c. Telephone d. Post e. Other electronic means <p>Where you object to receiving our marketing and communication information, the Group encourages you to contact the Data Protection Officer.</p>
<p>Lawful Obligations</p>	<p>Where it is a mandatory to comply with legal and regulatory requirements when processing your personal and sensitive data in order to:</p> <ol style="list-style-type: none"> a. adhere to our compliance obligations with anti-money

	<p>laundering, countering terrorist financing, avoidance of fraud, bribery and proliferation;</p> <ol style="list-style-type: none"> b. adhere to the obligations required by the tax authorities, Court or legal entity; c. adhere to audit and regulatory filings; d. adhere to tendering and procurement proposals and correspondences; e. law enforcement requests. <p>The Group conducts mandatory assessments in relation to your financial, investments and legal standing for our Group to ascertain your eligibility for our scope of services. The Group will enter into contractual arrangements with the private and public sectors. The Group balances this requirement by adopting additional safeguards on processing sensitive data under the GDPR and data protection laws.</p>
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Transferring your Data Abroad

The Group has external third parties based outside of the European Union and may need to transfer and share your personal data as per the lawful purposes and situations set out in this Data Protection Notice in order to comply with international and legal requirements.

As part of the management and disaster recovery operations of the Group, your personal data may be transferred and stored to a cloud-based service provider or web host located outside of the European Union.

In the event that the Group transfers and shares your personal data, the Group ensures a protected and professional degree of protection which is applicable to your personal data through the adoption and implementation of the following safeguards:

- The Group will only transfer personal data to countries that are deemed to have an adequate level of data protection;
- Where the Group has entered into a service agreement with a service provider, the Group may use specific contracts with a data security addendum which will afford the same level of data protection;
- The Group will refer the matter to the appropriate Regulator to ensure that additional safeguards can be met regarding sensitive data.

The Group will only transfer and share your personal and sensitive data under one of the following situations:

- The jurisdiction to which we transfer your personal data to is approved by the European Commission as having an adequate level of protection for personal data;
- The transferring recipient has European Commission data privacy contractual clauses with the Group; or
- You have provided the Group with your unequivocal consent to transfer and share your personal data.

Should you have any questions regarding the transfer or sharing of your personal data outside of the European Union or to countries which are deemed to be data protection compliant, the Group encourages you to contact the Data Protection Officer.

Retention of your Data

The Group has a lawful obligation to retain your personal data for as long as we have a lawful reason to do so, namely:

- For client screening, identification and reporting as required under the anti-money laundering and countering of terrorist financing and proliferation legal framework;
- The provision of our scope of services to you;
- The provision of tendering and procurement purposes;
- For the duration of our client relationship where there is a legal requirement to adhere to;
- Until the termination of the contractual relationship with you or your designated.

Contact Information

Should you have any questions pertaining to this Data Privacy Notice, have a data request or concern to be addressed, we encourage you to contact the Data Protection Officer:

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