

Dixcart Management (Malta) Limited

Privacy Notice

This Privacy notice ('Notice') applies to personal information which is collected and held by Dixcart Management Malta Limited ('Dixcart') and Elise Trustees Limited ('Elise') in the normal course of carrying out our business. To comply with the EU General Data Protection Regulation ('GDPR'), this notice explains what information we collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure. It continues to apply even if your agreement or business relationship with us ends. This Privacy Notice should be understood as covering both activities of Dixcart and Elise. This Privacy notice should be read in conjunction with our Terms and Service Agreement and our Business Engagement Form.

What information we collect

We'll only collect your information in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of our products or services you apply for, currently hold or have held in the past. We may also collect information about you when you interact with us, e.g. call us or ask about any of our services. Some of it will come directly from you, e.g. when you provide us with passports, utility bills etc. in order for us to be able to provide you a service. It can also come from your financial advisor, trustee, other Dixcart companies, or other sources you've asked us to obtain information from. We might also get some of it from publicly available sources.

The information we collect may include:

Information that you provide to us, e.g.:

- personal details, e.g. name, previous names, date and place of birth;
- contact details, e.g. address, email address, landline and mobile numbers;
- information concerning your identity e.g. photo ID, passport information, National Insurance number, National ID card and nationality;
- market research, e.g. information and opinions expressed when participating in market research;
- Know your client ('KYC') and Client Due Diligence ('CDD') Information e.g. utility bill, source of wealth/funds
- other information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise;

Information we collect or generate about you, e.g.:

- Investigation data e.g. due diligence checks, sanctions and anti-money laundering checks and external intelligence reports.
- Information relating to whether or not a person holds a status of Politically Exposed Person ('PEP') e.g. World checks or searches sourced through independent screening agencies.
- Information publicly available on the internet e.g. Internet search on company owned by a client.
- records of correspondence and other communications between us, such as emails.

Information we collect from other sources, e.g.:

- information you've asked us to collect for you, e.g. information about products or services or services from third party providers;
- information from third party providers, e.g. information that helps us to combat fraud or that an intermediary has provided to us on your behalf.
- any other publicly available sources of information;

How we'll use your information

We'll only use your information where we have your consent or we have another lawful reason for using it.

These reasons include where we:

- need to pursue our legitimate interests;
- need to process the information to enter into or carry out an agreement we have with you;
- need to process the information to comply with a legal obligation or EU or international agreements;
- believe the use of your information as described is in the public interest, e.g. for the purpose of preventing or detecting crime;
- need to establish, exercise or defend our legal rights;
- need to comply with a judicial or court order; or
- are opening a bank account as instructed by you;

The reasons we use your information include to:

- deliver our corporate, legal and trustee services or any other service you may require;

- carry out your instructions, e.g. to fulfil a payment request;
- manage our relationship with you, including (unless you tell us otherwise) telling you about products and services we think may be relevant for you;
- prevent or detect crime including fraud and financial crime, e.g. money laundering, financing for terrorism and human trafficking;
- security and business continuity;
- risk management;
- protect our legal rights and comply with our legal obligations;
- correspond with third parties such as intermediaries, banks, auditors, lawyers, notaries, and public authorities

Compliance with laws and regulatory compliance obligations

We'll use your information to meet our compliance obligations, to comply with other laws and regulations and to share with regulators and other authorities that we or other Dixcart Group companies are subject to. This may include using it to help detect or prevent crime (including terrorism financing, money laundering and other financial crimes). We'll only do this on the basis that it's needed to comply with a legal obligation, it's in our legitimate interests and that of others or to prevent or detect unlawful acts.

Who we might share your information with

We may share your information with others where lawful to do so including where we or they:

- need to in order to provide you with products or services you've requested
- have a public or legal duty to do so, e.g. to assist with detecting and preventing fraud, tax evasion and financial crime;
- need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests;
- have a legitimate business reason for doing so, e.g. to manage risk, including financial crime risk, verify your identity or enable another company to provide you with services you've requested;
- have asked you for your permission to share it, and you've agreed.

How long we'll keep your information

We keep your information during your business relationship with us. In case of termination of such business relationship, we will keep your information for as long as is appropriate or legally required. For example, your accounting information will be stored for at least 10 years according to our statutory obligations. We may need to

retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and financial crime, responding to requests from regulators, etc.

If we don't need to retain information for this period of time, we may archive, destroy, delete or anonymise.

Transferring your information overseas

Your information may be transferred to and stored in locations outside the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our contract with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it.

Your rights

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it;
- the right to receive certain information you have provided to us in an electronic format and / or request that we transmit it to a third party;
- the right to request that we rectify your information if it's inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;
- the right to object to, and request that we restrict, our processing of your information in some circumstances. Again, there may be situations where your object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and / or to refuse that request.

You can exercise your rights or put forward any queries or complaints by contacting our Data Protection Officer at gdpr.malta@dixcart.com or +356 22484000

You also have a right to complain to the Malta Information and Data Protection Commissioner's Office by visiting <https://idpc.org.mt>, or to the data protection regulator in the country where you live or work.