

# Privacy policy

August 2018

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## Preamble

### A. Administrator of guideline

Adenia's main person in charge of reviewing, revising and updating the document as often as required:

Name	Position	e-mail
Mr. Feizal MOOSSA	Chief Risk Officer	<a href="mailto:f.moossa@adenia.com">f.moossa@adenia.com</a>

### B. Updates and review of the guideline

This document will be updated whenever there is a material change to the operations, structure, business or location within Adenia.

Adenia's compliance team has the responsibility for conducting the required review of this document and the Board of Directors of Adenia Partners has the authority to sign off these guidelines. In the future, and as soon as Adenia Services has been set up, Adenia Services' Board of Directors will be approving this guideline.

Date	Summary of changes made	Changes approved by	Signature & Name
October 2018	General update to upgrade Adenia's practices	Board of directors of Adenia Partners	

# 1. Introduction

Adenia Partners Ltd, of 2<sup>nd</sup> Floor, the Country Side, Vivea Business Park, St Pierre, Mauritius (“Adenia”, “we” and “our” as appropriate) respects the privacy of our investors, employees, service providers, engagement parties and visitors. We are committed to protecting and respecting your privacy. This Privacy Policy explains and governs:

- › how we collect information belonging to our investors, employees, service providers, engagement parties (“**you**” and “**your**”, as appropriate);
- › how we store and protect your personal data;
- › how and why we use your personal data; and
- › your rights to control your personal data.

This Privacy Policy covers the site [www.adenia.com](http://www.adenia.com). We have structured the website so that you can visit the website without identifying yourself or revealing any personal data nor is any information about investors or engagement parties available on the website.

We shall collect personal data about you when you are admitted as an investor, become an employee of Adenia or engage into an contractual relationship with us.

If you have any questions in relation to this policy, please contact our Data Protection Officer on [f.moossa@adenia.com].

We may amend this Privacy Policy from time to time to comply with applicable laws and regulations or to meet our changing business requirements. You are encouraged to periodically review this page for the latest information on our privacy practices and amendments to our Privacy Policy. By continuing to use our website and our services, you agree to be bound by all such updates and amendments.

# 2. What is Personal Data

Personal data refers any information relating to an identified or identifiable individual.

# 3. Collecting your Information

If you engage with us in any way, we may collect the following information about you in a number of ways:

- › information you provide through communications with us;

- › information provided on your behalf by your representatives or agents (“Agents”) who engage with us on your behalf in the ways described above; and
- › information from outside sources, commercial databases, marketing databases, public records and other publicly available information sources.

## 4. Why are personal information collected?

We require these personal data:

- › to provide our services;
- › to respond to requests;
- › to maintain client relationships;
- › to verify your identity and the other information you have provided to us, including your bank account information and (if relevant) the identity of your business associates;
- › to notify clients of our product offerings and developments;
- › for our reporting and management;
- › to fulfil our legal obligation; and
- › Any other purpose that would relate to our business.

## 5. Marketing

We may use personal data about individuals to market our product offerings and developments, including by email. However, you have the right to object to the processing of personal data concerning him/her for such marketing by writing to our Data Protection Officer on [f.moossa@adenia.com].

## 6. With whom is your personal data being shared?

Adenia does not trade, rent or sell any personal data to any other organisation or third party. Your information is only provided to the relevant authorities unless you give your consent or if required by law, and to service providers such as our bankers, auditors, legal advisors and other service providers. We restrict the information that is passed on to the strict minimum.

Following the recent amendments in the law, disclosure of beneficial ownership is now required to be made to the authorities, including the Registrar of Companies. This entails that, for domestic companies, information such as beneficial ownership will be made available to the public (subject to a small administration fee for searches).

## **7. Your consent**

Your consent to provide us with your personal data is required prior to the lawful processing of your data in line with your engagement with Adenia.

You will be required to confirm by giving your consent in a clear and unambiguous action, to having read our Privacy Policy and proving your agreement to the processing of your personal data by Adenia.

## **8. Withdrawal of consent**

You have the right to withdraw consent to Adenia as regards to the processing of your personal data at any time. Should you wish to exercise this right, you will have to inform Adenia in writing.

If you withdraw your consent, Adenia will not be able to provide you with certain services and which may even entail the termination of the agreement with Adenia. You will be informed accordingly.

Please note that notwithstanding the withdrawal of your consent, your personal data may still be processed by Adenia in performance of its legal obligations.

## **9. What security measures are implemented to safeguard transmission and storage of data?**

Subject to the purpose for which we have collected your personal data, we may store some of the information electronically in our system. Some or all of the personal data may be available to Adenia and its staff for use in accordance with this policy.

Adenia will endeavor to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard-copy, and to keep this information accurate and up to date.

## 10. Links to other websites

Our website does not contain links to other websites of interest.

Our website uses Google Analytics, a web analytics service provided by Google, Inc. (“Google”). Google Analytics uses “cookies”, which are text files placed on your computer, to help the website analyze how users use the site.

## 11. Accessing and correcting your information

You may, at any time:

- › exercise your right to request access to the personal data we hold about you (a subject access request). Please email [f.moossa@adenia.com](mailto:f.moossa@adenia.com) with the subject line “subject access request”;
- › request that we update and correct any out-of-date or inaccurate personal data we hold about you.
- › You can email us at [f.moossa@adenia.com](mailto:f.moossa@adenia.com) and also log-in to your account and make changes yourself;
- › exercise your right to ask us to restrict or erase your personal data; and
- › opt out of any marketing communications that Adenia may send you by unsubscribing following the link on the marketing email you have received.

## 12. Storage of personal data

Adenia will keep your personal data during your engagement with us and even after the completion of the relationship for legal and regulatory purposes.

## 13. Right to complain

You have the right to lodge a complaint with the Data Commissioner through the Data Protection Office.

## 14. Change in Privacy Policy

With ever changing dynamics in the business environment, policies may need to be reviewed and revised. Adenia reserves the right to change this privacy policy at any time and notify you by posting an updated version of the policy on its website.



By signing the below, you are hereby giving your consent to having read the above Privacy Policy and proving your agreement to the processing of your personal data by Adenia.

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