



PRIVACY POLICY

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1. Introduction

This Privacy Policy explains how AXYS Investment Partners Limited, AXYS Stockbroking Ltd and AXYS Corporate Advisory Ltd (altogether referred as “AXYS”, “we”, “our” or “us”) collect, use, disclose and transfer personal information that has been provided to us.

AXYS Investment Partners Limited (“AIP”) is authorized and licensed by the Financial Services Commission (the “FSC”) in Mauritius to operate as an Investment Adviser, CIS Manager and Distributor of Financial Products.

AXYS Stockbroking Ltd (“ASL”) is authorized and licensed by the FSC to operate as an Investment Dealer.

AXYS Corporate Advisory Ltd (“ACA”) is authorized and licensed by the FSC to operate as a Corporate Finance Adviser.

Personal data about you when you are a client, an employee of AXYS, a potential employee, a beneficial owner of a client, a potential client or a user of AXYS services (collectively, “users” “your” or “you”) means any data relating to an identified or identifiable natural person (including but not limited to name, address, contact details etc).

Additionally, when you choose to receive our marketing communications (including newsletters, leaflets etc.), we ask that you provide us with your email address. The provision of such information is purely voluntary, and you may opt out of receiving our marketing communications at any time by unsubscribing to these communications.

Our Privacy Policy must be read together with the Data Protection Act 2017, any legal notices or terms and conditions which may be available on our website. Unless otherwise superseded by alternative terms and conditions (such as in users or employee contracts), the method by which the user's personal data is collected, used, distributed, and maintained will be in line with this policy.

2. Data we Collect and Hold on You

- **Use of our Products or Services** – your personal data will be used by AXYS to provide you with products and services being provided or distributed by AXYS.
- **By participating in our Events** – if you have attended any of our events, we may collect your name, organisation, job title, telephone numbers and email address.
- **When you visit or register to use our website** – we may collect some data through cookies. This may include data regarding your use of our website, including the pages you viewed, any document downloads, any subscription for alerts or newsletters and any search terms

entered. Your IP address may be used by AXYS to provide you with further data regarding AXYS.

- **Use of Subscription Data** – if you seek or subscribe to any services of AXYS, we will collect and use relevant data to carry out our regulatory due diligence processes, including amongst others, your name, phone number, title, email address and National Identity Card/ Passport details. This data may be shared with approved third-party service providers of AXYS and with relevant regulatory authorities.
- **Use of Technology Systems of AXYS** – while using any software application made available by AXYS, personal data may be collected regarding your device, operating system, browser, application name, vendor, IP address, and country of origin.
- **Use of AXYS Market Data** – we may collect personal data such as names, titles, phone numbers and emails for our own business and administrative purposes.
- **Recruitment and Employment** – we may collect personal data from applicants and employees as a part of our recruitment process, to conduct interviews and employee on-boarding. We may collect personal data such as name, contact details, professional background, reference, background checks and bank account information for payroll and for employee insurance.
- **Use of Social Networks** – you may be able to connect your personal or business social media accounts to social media accounts maintained by AXYS (LinkedIn, Facebook, Twitter, etc). Your use of this functionality shall be treated as your consent for AXYS to obtain the personal data available on the social media account you link to AXYS, in accordance with the privacy policies of those social media sites.
- **Records of Correspondence** – we keep records of communications, which take place between you and us, including emails, letters, meetings and telephone calls.
- **Other Information** – additional information you provide to us or created by us when providing services to you.

3. Purposes for which we Use Your Personal Data are as Follows:

- a. Carrying out due diligence, enhanced due diligence, politically exposed person checks and performing risk assessment on:
 - i. Clients' potential clients
 - ii. Clients' directors, beneficial owners, and authorised persons
 - iii. Users of our services
 - iv. Employees
 - v. Potential employees
 - vi. Service providers.
- b. Carrying out our obligations to Clients and/or users of our services under any applicable contract (including any Customer Registration Form or any other form of engagement document);
- c. Legal and regulatory compliance, which include:
 - i. Performing checks and monitoring transactions.
 - ii. Sharing information on suspected financial crimes, fraud and threats with law enforcement agencies and regulatory authority.
- d. Managing users' grievances and resolutions
 - i. Investigating any complaints
 - ii. Providing evidence in any dispute or anticipated disputes.
- e. Sending you marketing and promotional materials about our services, news and events:
 - i. Sending our email newsletters, information about services and related information which may be of interest to you
 - ii. Notifying you about changes to our services
 - iii. Sending you invites to our events.
- f. Internal management, administrative and organizational purposes
 - i. Records keeping, document retention/storage
 - ii. Database management
 - iii. Carrying out statistical analysis, creating forecasts and research purposes.
- g. Business continuity and risk management:
 - i. For detecting and preventing fraud and for risk management purposes

- ii. For database management
 - iii. For business and disaster recovery (creating backups)
 - iv. Ensuring network and information security.
- h. Sharing data with other third parties, including third parties who process personal data on our behalf.

4. Information Sharing

- a. We only share your information with AXYS affiliates to provide you with the services you have requested and to fulfil our contractual obligations to you, and to fulfil legal and regulatory requirements
- b. We may share your data with third parties who process data on our behalf to provide you or us with products or services for the purposes outlined above. These third parties include
 - i. Professional advisers, including lawyers, insurers and tax advisers
 - ii. Screening services providers, including due diligence and financial crime screening databases providers
 - iii. IT consultants, business partners and service providers, including hosting and cloud services providers
 - iv. Other suppliers and providers of services to us, including banks, our sub-contractors' agents and other entities within our group
 - v. Investors and other relevant parties in the event of an actual potential sale or other corporate transactions related to AXYS.
- c. We may also share your data with other third parties, where required or permitted by law for example
 - i. Regulatory authorities
 - ii. Government departments
 - iii. To the extent required by law, regulations or court order, for example, if we are under a duty to disclose your personal data in order to comply with any legal obligation
 - iv. When we consider disclosure to be necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal purpose
 - v. For the prevention or detection of any fraud or other criminal activity.

5. Transferring your Personal Information

- a. Where we cause your data to be transferred, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information and where required, with your consent
- b. We may, during the course of business transfer, store your personal data to a web hosting and/or cloud service provider, which may be located outside of our usual place of business as part of our disaster recovery plan, which may include processing of such information by staff operating outside of our usual place of business
- c. You can request further details about the safeguards that we have in place in respect of transfers of personal data outside of our usual place of business
- d. By submitting your personal data to us, you agree to us transferring, processing and storing your data as described above.

6. Retention of your Personal Information

We retain your personal data for the length of time required for the specific purpose or purposes for which it was collected. However, we may be obliged to store some personal data for a longer time, considering factors including:

- a. legal obligation(s) under Applicable Laws to retain records for a certain period
- b. maintain business records for analysis and/or audit purposes
- c. defend or bring any existing or potential legal claims
- d. deal with any complaints regarding the services; and
- e. guidelines issued by relevant data protection authorities.

7. Protection of your Personal Information

- a. We will hold your personal data securely whilst it is under our control. We keep the data for as long as is necessary for the relevant purpose.
- b. We take the security of our physical premises, our servers, and our website seriously and we will take all appropriate technical measures using recognised security procedures and tools in accordance with good industry practices to protect your personal data across all of these platforms.
- c. You should be aware that the transmission of information via the Internet is not completely secure we cannot guarantee the security of your data transmitted to our website.

8. Your Choices and Rights

You have a number of rights in relation to the personal data that we hold about you and you can exercise your rights by contacting us using the details in 'Contact Us' section.

These rights include:

- a. Obtaining information regarding the processing of your personal data and access to the personal data which we hold about you.
- b. Withdrawing your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- c. Requesting that we correct your personal data if it is inaccurate or incomplete.
- d. Requesting that we erase your personal data in certain circumstances. Please note that there may be circumstances where though you ask us to erase your personal data, we cannot erase it as we are legally entitled/obliged to retain it.
- e. Requesting that your personal data is only used for restricted purposes.
- f. Objecting that your personal data are processed for certain purposes, for example, for marketing.
- g. In some circumstances, requiring that some of your personal data to be transferred to you or a third party.
- h. Lodging a complaint with the relevant regulatory body in Mauritius – Data Protection Office.

There may be circumstances in which we are entitled to refuse requests for access to copies of personal information, such as if the data is subject to legal professional privilege.

9. Your Consent

By using our website, you agree to the terms of this Privacy Policy, as may be updated from time to time.

10. Applicable Legislation

Use of our website and any activities concluded with us are governed by the laws of the Republic of Mauritius. This Privacy Policy is written in line with international best practices and in compliance with all Applicable Laws.

11. Changes to Privacy Policy

Our website and/or any other information that we display publicly may change from time

to time, due to many factors such as the Applicable Laws or our own internal processes. As a result, it may be necessary for us to make changes to this Privacy Policy.

You may request a full copy of this Privacy Policy from us using the contact details set out below. If we change this Privacy Policy in any way, the updated version will be posted on our website in a timely manner.

12. Contact Us

If you have questions or concerns regarding the way in which your personal information has been used, please contact:

The Data Protection Officer

AXYS Investment Partners Ltd / AXYS Stockbroking Ltd / AXYS Corporate Advisory Ltd

6th Floor, Dias Pier Building,

Le Caudan Waterfront,

Caudan, Port Louis 11307

Mauritius

Tel: +230 405 4000

Email: info@axys.mu