

# Privacy Policy

## Introduction

Financial Services Network Limited (hereinafter, “FSN” or “the Company”) is an Global Business Category One company authorised as an Investment Adviser (Unrestricted), by the Financial Services Commission of Mauritius (“FSCM” or “the Commission”), Licence Number C11601670 and is committed to the protection of privacy and safeguarding of personal and financial information and data as provided to us by you either in paper form, verbally or electronically. The Company has established this Privacy Policy (the “Policy”) in accordance with the Data Protection Act 2017 and the EU General Data Protection Regulations (“GDPR”), GDPR applies across the European Union and we are responsible as ‘controller’ of your personal information for the purposes of GDPR.

Your privacy is considered and treated by the Company with utmost importance and highest priority and this Policy applies to former, existing and potential clients as well as to any visitors of the Company’s website. This policy aims to provide you with information on what type of information we collect, how it is used, how it is stored, the circumstances where it could be shared with third parties and your rights and obligations.

## Consent

By providing us with your personal data, subscribing to and/or using (collectively, “Using” or “Use”) of the Company’s website or entering into an agreement with the Company you expressly consent and agree with the terms of this Policy and consequently consent to the collection, processing, maintaining, storage, use and disclosure of personal data by the Company whether provided by you or by another third party as in accordance with this Policy and as explained below herein. You further consent to the Company transmitting personal data/information to any third party for regulatory purposes or which may require the same to effectively implement the services or effectively execute any operational function performed by the Company.

## What is Personal Data

Personal data means any information relating to an identified natural person or identifiable person who can be directly or indirectly identified in particular by reference to an identifier, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## Collection of Personal Data

The Company shall collect and process personal information necessary to fulfil legal and regulatory requirements for the provision of the Company’s services and to improve our services to you. The Company gathers personally, identifiable information that may be used, either alone or in combination with other information, to personally identify, contact or locate you and may in certain circumstances, gather information from third parties and/or other sources which will help the Company to construct a profile based on your requirements and preferences to provide our services effectively.

Such information shall include:

- a) Information about you that you give us by filling our client forms/agreements, or by corresponding with us by phone, e-mail, in person or otherwise. It includes information you provide when you choose to use our services, participate in any company event and when you send any information to us under any capacity. The information you give us may include your name, address, e-mail address and phone number, financial information, personal description and photograph
- b) Information we collect/receive from other sources about you if you use any of the services we provide and/or professionals we partner with. We are working closely with third parties including, for example, business partners, brokers, vendors, insurers, platforms, fund houses, trustees, search information providers, credit reference agencies. Such partnerships will be notified to you in the beginning or during the course of our relationship and the extent to which such partnerships are required to provide our services to you, such notification can be in the form of additional application forms of such partners or access to their website/platform and in such case shall be covered by GDPR in their own right as applicable.

As a client you are responsible for the true and accurate nature of the personal information you provide to the company. Your personal information and/or data shall be checked when it is collected and at regular intervals thereafter, if any personal information is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate. You are required to keep the company informed of any changes in personal information by emailing our Support Department at [info@fsn-global.com](mailto:info@fsn-global.com).

## Use of Personal Data

The Company uses your personal information only as required on a lawful basis for the performance of our services to you, to improve our services, and enable us to inform you of any additional products, services or promotions relevant to you and in this respect, you hereby consent to the usage of this data for such purposes.

If you no longer wish to receive any promotional communication, you may opt-out of by contacting the Company via the Contact us page on the Company’s website or send an email to our Support Department at [info@fsn-global.com](mailto:info@fsn-global.com).

## Protection and Security of Personal Data

The Company does not sell, license or lease to anyone clients' personal data, except as described in this Privacy Policy. The Company has implemented appropriate measures to protect personal data from accidental loss, unauthorised or unlawful access or processing or destruction. The Company employs physical, electronic, and procedural safeguards to protect personal data and it does not store personal data for longer than is necessary for the provision of services or as permitted by the applicable regulations. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

The Personal Data we collect from you is stored on our servers and/or on cloud servers within the EU, certain email communications and/or data transmitted to us over email and/or other means of electronic transfer of documents may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by third parties operating outside the EEA which work for us. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and GDPR, especially in instances where data will be transferred to, and stored at, a destination outside the EEA.

The Company also informs you to maintain confidentiality and not share with others your usernames and private passwords ("credentials") or as provided by the Company. You are responsible for keeping your credentials confidential. We ask you not to share your credentials with anyone.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data when you transmit this to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

We have also implemented procedures to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Disclosure of your Personal Data

You agree that we have the right to share your information with selected third parties we use to help deliver our products and/or services to you including:

- business partners, brokers, vendors, insurers, platforms, fund houses, trustees, search information providers or any other third party required for the performance of any contract we enter into with them or you;
- credit reference agencies and/or banking and financial institutions and/or auditors for, among others, the purpose of assessing your financial information (where this is a condition of us entering into a contract with you).
- Law enforcement agencies and regulatory bodies such as the Mauritius Financial Services Commission and/or the Police for the purposes of complying with local and international regulations against money-laundering, fraud and the general prevention of crime and illegal activities

We will disclose your personal information to third parties:

- In the event that this is necessary for the delivery of our products and/or services to you (for example by using appropriate and compliant IT systems that transmit financial information and/or orders and/or execute payment and/or other financial transactions);
- If we are under a duty to disclose or share your personal data to comply with any legal and/or regulatory obligation, or to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of us, our clients or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, anti-money laundering and credit risk reduction;
- If we are acquired in full or substantially by a third party, in which case personal data held by us about our clients will be shared with the acquirer;

We only allow the third parties we work with to process your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on our selected third parties to ensure they can only use your personal information to provide services to us and to you.

## Your rights

Under GDPR, you have the following rights, which we will always work to uphold:

1. Access - The right to be provided with a copy of your personal data, together with information regarding the processing of your data
2. Rectification - The right to request rectification of any inaccurate or incomplete personal data we hold about you.
3. To be forgotten - The right to request erasure of your personal information based on legitimate grounds and where there is no good reason for us to continue to process or archive it.
4. Restriction of processing - The right to restrict the processing of your personal data, based on legitimate grounds or in the event that you contest the accuracy of the data, we no longer need to process or archive your data.

5. Data portability - The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to another controller, where technically feasible.
6. Objection — The right at any time to object to your personal information being processed for direct marketing (including profiling) or other automated individual decision-making.
7. Withdrawal of Consent - The right to withdraw consent at any time where consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof.
8. Complaint –The right to lodge a complaint regarding the processing of your personal data. Our details can be found in the How to contact us section of this Policy. If you feel that your concerns have not been adequately addressed by us, you have the right to lodge a complaint with the Data Protection Commissioner of Mauritius (<http://dataprotection.govmu.org>)

The right to access the information held about you, under certain conditions, may be subject to a fee of €25 to meet our costs in providing you with details of the information we hold about you. We shall aim to comply with requests for access to personal information as quickly as possible and will ensure that we comply with legislation unless exceptions apply. In such cases, the reason for any delay will be explained in writing to the data subject making the request. In processing a request, the identity of the data subject will need to be verified before information will be released. No personal data will be disclosed to a third party without the written consent of the data subject.

We reserve the right to refuse repeated/vexatious requests.

Further information about your rights can also be obtained from the Data Protection Office in Mauritius.

### **Retention of Personal Data**

In accordance to the Company's regulatory requirements and as required by Law your personal information will be kept and retained for a minimum period of seven (7) years, which will commence on the date of the last transaction or the date of termination of our business relationship in accordance to the Client Agreement and Terms of Business.

We may keep your data for longer if we cannot delete it for legal or regulatory reasons. In particular, the retention of data is not limited in time in the case of pending legal proceedings or an investigation initiated by a public/regulatory authority, provided that in each case the Company has been informed of any pending legal proceedings or the investigation initiated by a public/regulatory authority within the retention period described hereinabove.

### **Use of “Cookies”**

Cookies are small pieces of digital information which use a unique identification tag and are stored on your computer, mobile device or any other device as a result of using the Company's website or other services the Company provides. Cookies are used to assess and improve the performance of our website and its products and services offered. Cookies are normally accepted automatically, however, you can refuse to have cookies stored on your device or if available, change the settings of your browser to refuse all cookies, and/or have your device notify you each time a cookie is sent to your device.

For more information about cookies, you may refer to the Company's “Cookie Policy” available on our website: <http://fsn-ltd.com/>

### **Amendment/Review of the Privacy Policy**

The Company reserves the right to review and/or amend this Privacy Policy at any given time it deems suitable and appropriate. The Policy is available for review on the Company's website and any new version will be effective from the time of posting on the website, we ask you to review our website on a regular basis to ensure that you have read the latest version. We may also notify you by email of any material changes.

### **How to contact us.**

If you have any queries regarding this policy or the use of your personal data including making a request for access, please contact us via the Contact us page on the Company's website or by email to our Support Department at [info@fsn-global.com](mailto:info@fsn-global.com) or by telephone +357 25 817 027 or by mail at Vasili Vrionides Street, City Chambers, 4th Floor, Limassol 3095, Cyprus.