



Privacy Notice

Claritas Compliance Limited

Claritas Legal Limited

Claritas is a Cayman Islands based professional practice composed of two separate legal entities: Claritas Compliance Limited and Claritas Legal Limited. All Claritas entities are committed to protecting the privacy and security of your personal information.

This Privacy Notice sets out how Claritas Compliance Limited and Claritas Legal Limited (“we” or “our”) process, collect, use and disseminate data, whether on individuals (including personal data) or otherwise. Where the data held relates to individuals, this document also sets out the rights of those individuals in respect of that personal data.

"Personal Information" is information that personally identifies you, including, for example, your name, address, date of birth, gender and national identity or passport numbers.

This Privacy Notice applies to our websites, plugins, and tools. When you visit our website (referred to as the “Site”), you consent to the practices described in this Privacy Notice by using this Site.

Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed in writing to justine@claritascompliance.com.



Changes to this Privacy Notice

We keep this Privacy Notice under review and any updates will appear on our website at www.claritaslegal.com

Who We Collect Information From

This Privacy Notice applies to the following individuals from or about whom we collect personal information:

- Those who have entered into, or are contemplating entering into, a contract for the provision of services, those connected to such persons and those who are connected to a corporate client (such as owners, investors, controllers, employees, directors and officers of a corporate client or other legal or non-legal body);
- Third parties with whom we interact as part of providing our services to our clients;
- Those who may be party to, or connected to a party to, a legal transaction or legal proceedings involving our client and/or the services which we have been engaged to provide to our clients;
- Those who are, work for or are agents of, suppliers or service providers who provide goods and services to us;
- Those who apply for or express an interest in employment or other similar position with us;
- Those who request newsletters, marketing material or other publications from us; and
- Visitors to the Site.

The Data We Hold



The type of data we may collect and process includes:

- Contact details (including names, postal addresses, job title, email addresses and telephone numbers which data we may combine with publicly available information);
- Information required for us to meet legal and regulatory requirements, and best practice, in particular in respect of anti money laundering legislation. This may include but is not limited to identity information such as your passport or other identity document details, date of birth, nationality, place of birth and country of residence, job history, source of wealth or funds and other information concerning your background (which may include sensitive information such as criminal records), only where this is necessary to enable us to carry out appropriate checks in relation to contracts with you or someone else that you work for or are otherwise related to, or to accurately establish or verify your identity;
- Biometric data including a photographic likeness of you for identification and verification purposes;
- Information provided in the course of the provision of legal or compliance services (for example, information on professional relationships and background, financial wealth and assets held, transactions entered into, tax status, disputes and court proceedings engaged in);
- Financial information, such as payment related information;
- Data submitted by an applicant through a job application form;
- IP address;
- Web page analytics and usage information, such as web page activity, links clicked, and videos watched;
- Geolocation data;
- Professional interests and events attended (including images or video obtained during visits to events hosted by us);
- Any other information you may provide to us.



How We May Use Your Information

We may use your information in the following ways:

- To fulfill your requests and discharge obligations under a contract we entered into with you;
- To communicate with you about the information you requested;
- To manage, maintain and develop our relationship with you;
- To promote the services we offer;
- To contact you via surveys about your opinion of current services or of potential new services;
- To infer whether you are a good candidate for our products and services or for employment with us;
- To facilitate effective management and administration of our business, including business planning and fees collection;
- To discharge any legal, regulatory or court ordered obligation imposed on us;
- To remember information you entered on the Site; and
- To improve our websites, services, and products.

On What Basis Do We Use Personal Information?

For each of the purposes for which we process information, we rely on one or more of the following legal justifications:

- **Consent.** Personal Information is processed on the basis of consent given by you to us.
- **Contractual Necessity.** Personal Information is processed for us to discharge our contractual relationship with Clients;
- **Legitimate Interest and/or Business Improvement.** Personal Information is processed in circumstances which can balance our legitimate interests with your own legitimate interests and in accordance with the Cayman Islands Data Protection Act. Our legitimate interests include: (a) providing legal and compliance services; (b) carrying out such services effectively; and (c) communicating with you in respect of those aspects of our services which we consider to be of relevance to you.
- **Legal and Regulatory Requirement.** Personal Information is processed in order for us to comply with a legal obligation (other than one imposed by a contract).
- **Legal proceedings, etc.** Personal Information is processed on the basis that it is necessary for (a) any legal proceedings; (b) obtaining legal advice; or (c) establishing, exercising or defending legal rights, and in accordance with the Data Protection Act.



How Your Information May Be Shared

We will share your information with others only if and to the extent it is appropriate and necessary to do so for one or more of the uses outlined above. Whenever we share your personal information, whether internally or externally, we will ensure that such sharing is kept to the minimum necessary.

We may share your information with our trusted partners who work on our behalf, including vendors, suppliers and contractors.

We may be required to share your information with a regulatory, governmental or judicial authority.

Cookies

We may use cookies and related technologies to collect information about you, improve the site, communicate with you, and provide targeted information to you. Cookies help us to personalise your online experience. If you choose to decline cookies, you will not fully experience the features of the Site. Most Internet browsers have options for controlling, disabling, and deleting cookies on your computer.

Security

We use organisational, technical, and administrative measures to protect personal information under our control. When you submit information through a form on the Site, we may encrypt the transmission of that information. However, no data transmission over the Internet or any other network can be guaranteed to be 100% secure. While we strive to protect information transmitted on or through the Site, we do not guarantee the security of any information you transmit.



How to Opt Out from Emails

If you do not want to receive emails from us, you can opt out or change your preferences at any time by sending an email to info@claritascompliance.com

Rights of data subjects

Data subjects who have data held by us may have certain rights in respect of their personal data. Any such data subject wishing to exercise any rights under applicable data protection laws (including the right to withdraw any consent to processing previously given the right to access to data, or to have data corrected, updated, rectified or erased; or for access to data to be restricted or provided to any third party; or to object to any particular processing) should send the request in the first instance to justine@claritascompliance.com.

In any case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data, we may be unable to provide relevant services or there may be a restriction on the services which can be provided.

Data Retention

We only keep data for as long as necessary to fulfil the purposes for which it was collected. Our policy is to retain data in relation to a client matter for the period of time appropriate for us to fulfill the purposes outlined in this Privacy Notice or as necessary to comply with our legal obligations, resolve disputes or enforce our agreements, whichever is longer and in any event in accordance with our document retention and destruction policy, as may be amended from time to time at our sole discretion. In general, we will keep your data and files for a minimum period of six (6) years from the conclusion of the matter. This is subject to certain exceptions including in instances where the personal data is relevant to a dispute after closure



of the matter or where the data cannot be deleted for legal, regulatory or technical reasons.

How to Contact Us

If you have any questions regarding this Privacy Notice or any data which we hold about you, please contact us by email at justine@claritascompliance.com

If we are unable to address your questions or concerns to your satisfaction, you may be able to make a complaint to the Office of the Ombudsman, a data protection regulatory body, who is an independent regulator. The contact details for the Office of the Ombudsman are set out below:

Office of the Ombudsman
5th Floor, Anderson Square
64 Shedden Road, P.O. Box 2252
George Town, Grand Cayman KY1-1107 Cayman Islands
info@ombudsman.ky