DIRECTOR PRIVACY NOTICE

CIM Financial Services Ltd ("CFSL") respects your privacy and is committed to protecting your personal data. CFSL acts as the data controller in respect of the personal data it collects and processes about you. We process your personal data in accordance with the Mauritius Data Protection Act 2017 ("MDPA").

1. What Personal Data We Collect

We collect personal information about you in your role as a director. This includes:

(i) **Contact details**: Name, residential address, telephone number, mobile number, email address.
(ii) **Individual details**: Date of birth, Birth certificate, Place of birth, Gender, Nationality, Marital status, Marriage certificate, TIN/PIN of Directors, Signature
(iii) **Identification details:** National Identity Card or passport number.
(iv) **Professional details:** Curriculum vitae, qualifications, and directorship history.
(v) **Financial details:** Bank account information, tax numbers and director remuneration records.
(vi) **Related Party Details:** Name of Spouse, ascendants and descendants.
(vii) **Compliance details:** Background checks, regulatory approvals, and conflict-of-interest declarations.
(viii) **Special categories of personal data:** personal data related to minors and biometric data (facial recognition) for access control system.

2. Why We Use Your Personal Data

We process your personal data for clear legal and business reasons:

(i) **Appointment and Remuneration**: To assess your eligibility, qualifications, residency status, due diligence information, conflicts of interest and any matters relevant to your appointment, profile and remuneration as a director.
(ii) **Corporate Governance:** To manage board, shareholder and committee meetings, prepare minutes, maintain statutory records and registers, and implement board or committee decisions.
(iii) **Legal and Regulatory Compliance:** To comply with legal, regulatory, filing, disclosure, audit, investigation and litigation obligations, including requests from regulators, public authorities, banks and other relevant institutions.

3. Lawful Basis

We process your personal data for the following legal bases:

(i) The processing is necessary for the performance of your contract with CFSL.
(ii) The processing is necessary for compliance with our legal and regulatory obligations, for instance under the Companies Act 2001 and AML/ CFT laws and regulations
(iii) Legitimate interests pursued by CFSL.
(iv) Consent

4. Access to your Personal Data

Only specific employees within CFSL who may have access to your personal data, and they are required to keep that data confidential.

CFSL's Company Secretary, Cim Administrators Ltd, acting as a Data Processor on behalf of CFSL may collect your information directly from you and process the information on behalf and upon CFSL's instructions.

We may need to share your personal data with third parties which assist us in fulfilling our responsibilities regarding the purposes listed above. When we share personal data with these third-party service

providers, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data.

We are also required to disclose your personal data where processing is necessary for us to comply with our legal obligation, including responding to legal processes or lawful requests or where:

- We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
- We believe it is necessary to protect our rights;
- We need to protect the rights, property, or personal safety of any member of the public or a customer of our company or the interests of our company; or
- You have given your consent.

We require our service providers, Data Processors and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We have agreements in place with our processors to ensure that they comply with these privacy terms.

5. Transfer of Personal Data Outside Mauritius

In certain circumstances, your personal data may be transferred to and processed outside Mauritius. We will ensure that any such transfer is compliant with the provisions stipulated in the MDPA. If your personal data is transferred to a country that does not provide an adequate level of protection, we will implement appropriate safeguards, such as contractual clauses, to protect your personal data.

6. Data Retention

We collect and process your personal data for specific purposes and will retain it only as long as necessary to fulfil those purposes unless required for legitimate business or legal reasons. CFSL thus retains data for the duration of the directorship and for 7 years, after the termination of the contractual relationship and specific periods mandated by domestic laws and per our Record Management Procedure.

7. Your Rights

Under the Mauritius Data Protection Act 2017, you have rights regarding your personal data as follows:

(a) Right of Access: You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information, in an intelligible form, using clear and plain language.

(b) Right to Rectification: If you believe that the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.

(c) Right to Erasure: In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.

(d) Right to Restriction of Processing: You have the right to request the restriction of processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.

(e) Right to Object: You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.

(f) Right to Withdraw Consent: If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise your right as a data subject, you are requested to send an email to the Data Protection Officer at dpo@cim.mu.

You are required to send your request with all required information, including:

- The request type – For example, are you requesting a copy of your information, the deletion or modification of your personal data; and
- All relevant information which can help to successfully respond to your request.

8. Your Responsibilities

You are responsible for the personal data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way.

Further, if you provide any personal data concerning any other person, such as members of your family, you are responsible for providing any notices and obtaining any consent necessary for us to collect and use that data as described in this notice.

9. Mandatory and Voluntary Information

To enable us to carry out business transactions and fulfil our contractual, legal and regulatory obligations, certain personal data must be provided to us. This mandatory information may include, without limitation, your name, contact details and any other information required for the purposes set out in this Director Privacy Notice. If you do not provide the required information, we may be unable to establish, maintain or continue our contractual relationship with you.

Where you voluntarily provide personal data that is not required, we will assess whether it is necessary for the purposes for which it was provided. If we determine that the information is not necessary, we will delete it or otherwise securely dispose of it in accordance with our data protection obligations.

10. Personal Data Security

We prioritise the security of your personal data and take appropriate technical and organisational measures to protect it from unauthorised access, disclosure, alteration, or destruction. We employ a combination of physical, administrative, and technological safeguards to ensure the confidentiality, integrity, and availability of your data. Here are some of the security measures we have implemented: adoption and implementation of IT Policies and Data Protection Policies, access controls, secure storage, and incident response amongst others.

11. Queries and Complaints

If you have any questions, concerns or complaints about the processing of your personal data, you should contact the Data Protection Officer. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal data in accordance with this Director Privacy Notice and provide you with a timely and appropriate response typically within thirty (30) days. If additional time is required, we will inform you accordingly.

When contacting the Data Protection Officer, you are requested to provide a clear and detailed description of your concerns. This will help us understand the issue and take appropriate action.

If you believe that we have not handled your request appropriately, you may submit a complaint to the Data Protection Office of Mauritius.

12. Contact Us

For inquiries or to exercise your data protection rights, contact our Data Protection Officer as follows:

Email: dpo@cim.mu
Phone Number: 5251 6073
Address: Cnr Edith Cavell and Mère Barthélemy Streets, Port Louis, 11302, Mauritius

13. Changes to this Director Privacy Notice

We may update this Director Privacy Notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to the Mauritius Data Protection Act 2017 and any laws or regulations thereof. The latest version will be made available to you on ……...