

FIIG International Limited:

Privacy Notice

Introduction

Welcome to FIIG International Limited's privacy notice (the "**Notice**").

FIIG International Limited (C 83178) of 171, Old Bakery Street, Valletta VLT 1455, Malta, European Union ("**FIIG International**"; "**we**"; "**us**"; "**our**") respects your privacy and is wholly committed to protecting your personal data.

FIIG International is licensed by the Malta Financial Services Authority ("**MFSA**") and is duly authorised to provide the following investment services:

- placement of instruments without a firm commitment basis; and
- reception and transmission of orders to third parties for execution (collectively, our "**Services**"),

under Licence Number IS/83178 in terms of the Investment Services Act 1994 (Chapter 370 of the Laws of Malta).

Accordingly, the purpose of this Notice is to set out the basis on which we will process your personal data **when you**:

- approach and engage us to provide you with our Services;
- request and receive our Services (including during the service-provision); and
- visit and use our dedicated website <<http://www.fiig.com/international.html>> (the "**Website**" or the "**Site**"), regardless of where you visit and use it from.

This includes any data which you may provide to us for and in relation to our newsletters, industry updates, events and other marketing and promotional communications.

FIIG International deals with eligible counterparties and/or professional clients, this Notice is also addressed to their respective beneficial owners and shareholders, directors, representatives, company officers and other individuals involved in their management and administration (as applicable).

This Notice should therefore be circulated accordingly.

1. Important information and who we are

We process your data in an appropriate and lawful manner, in accordance with the Data Protection Act (Chapter 586 of the Laws of Malta) (the "**Act**"), as may be amended from time to time, and the General Data Protection Regulation (Regulation (EU) 2016/679) (the "**Regulation**" or the "**GDPR**").

This Notice aims to ensure that you are fully informed on how FIIG International will collect and process your personal data in the scenarios indicated above in the '**Introduction**'. It informs you about the items of personal data that we may collect about you and how we will handle it, and in turn, also tells you about (i) our obligations to process your personal data responsibly, (ii) your data protection rights as a data subject and (iii) how the law protects you.

Neither the Website nor our Services are intended for minors.

It is important that you read this Notice together with any other privacy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Notice supplements the other notices and is not intended to override them.

Please note that by engaging us, you and/or your respective organisation enter into a contractual relationship with FIIG International, as subject to and governed by the terms set out in our Terms of Business at <http://www.fiig.com/international.html> (the “**Terms**”). These Terms stipulate that we will process your personal data in accordance with the practices set out in this Notice.

Controller

FIIG International is a fully-owned (100%) subsidiary of FIIG International Holdings Limited, a full-owned (100%) subsidiary of FIIG Securities Limited, which is authorised and regulated by the Australian Securities & Investment Commission in Australia.

We (**FIIG International**) are the controller and responsible for the Website.

We are also the controller of any personal data which we collect or receive and which we process in connection with (i) the Services and/or (ii) the Website. Our parent company – FIIG Securities Limited – may also be a controller of your personal data in its own right, whether jointly with FIIG International or as an entirely separate data controller.

FIIG Securities has its own separate data protection notice which will be made available to you if and when it processes your personal data.

We have a dedicated data protection team which serves as our data protection contact point and is responsible for overseeing queries in relation to this Notice and for handling any data subject requests. If you have any question about this Notice, including any requests to exercise your legal rights, please contact our data protection team using the contact details set out below. Please use the words ‘Data Protection Matter’ in the subject line.

Our full details are as follows.

Contact details

Full name of legal entity: FIIG International Limited (C 83178)

Email address: compliance@fiig.com

Postal address: Dixcart House 2, Sir Augustus Bartolo Street, Ta' Xbiex XBX1091, Malta.

Our business address is at Dixcart House 2, Sir Augustus Bartolo Street, Ta' Xbiex XBX1091, Malta.

You have the right to lodge a complaint at any time to a competent supervisory authority on data protection matters, such as in particular the supervisory authority in the place of your habitual residence or your place of work. In the case of Malta, this is the Office of the Information and Data Protection Commissioner (the “**IDPC**”) (<https://idpc.org.mt/en/Pages/Home.aspx>). We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes.

This version was last updated on July 2018.

It is imperative that the personal data we hold about you is accurate and current at all times. Otherwise, this will impair our ability to provide you with the requested Services, amongst other potential and salient issues. Please keep us informed if your personal data changes during the course of our professional (service) relationship with you.

Third-party links

The Website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy notice or policies. We strongly encourage you to read the privacy notice of every website you visit, particularly when leaving our Website.

2. Some key definitions

Set out below are key definitions of certain data protection terms which appear in this Notice.

“**Consent Form**” refers to separate documents which we might from time to time provide you where we ask for your explicit consent for any processing which is not for purposes set out in this Notice.

“**Data subjects**” means living individuals (i.e. **natural persons**) about whom we collect and process personal data.

“**Data controller**” or “**controller**” means any entity or individual who determines the purposes for which, and the manner in which, any personal data is processed.

“**Data processor**” or “**processor**” means any entity or individual that processes data on our behalf and on our instructions (we being the data controller).

“**Personal data**” means data relating to a living individual (i.e. **natural person**) who can be identified from the data (information) we hold or possess. This includes, but is not limited to, your name and surname (including maiden name where applicable), address, date of birth, nationality, gender, civil status, tax status, identity card number & passport number, contact details (including mobile and home phone number and personal email address), photographic image, bank account details, emergency contact information as well as online identifiers. The term “**personal information**”, where and when used in this Notice, shall be taken have the same meaning as personal data.

“**Processing**” means any activity that involves use of personal data. It includes obtaining, recording or holding the data, or carrying out any operation or set of operations on the data including, organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring personal data to third parties.

“**Sensitive personal data**”, “**sensitive data**” or “**special categories of personal data**” includes information about a person's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership, physical or mental health or condition or sexual life, or about the commission of, or proceedings for, any offence committed or alleged to have been committed by that person, the disposal of such proceedings or the sentence of any court in such proceedings. This type of sensitive data can only be processed under strict conditions.

Note that personal data does not include information relating to a legal person (such as, eligible counterparties, professional clients and other legal entities). In that regard, information such as a company name, its company number, registered address and VAT number does not amount to personal data in terms of both the Act and the GDPR. Consequently, the collection and use of information strictly pertaining to a legal person does not give rise to data controller obligations at law. We will still naturally treat any and all such information in a confidential manner, in accordance with our standard client practices and obligations at law.

3. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (**anonymous data**).

During the course of its business relationship with you and/or your respective organisation, FIIG International will need to collect, use and sometimes disclose, various items of personal data about you for various purposes associated with the scope of the Services that we offer (be it at your own request or on behalf of your respective organisation).

Thus, to ensure transparency, we have made an attempt to group and categorise below the different kinds of personal data about (i) our customers (including, where applicable, their respective beneficiaries and shareholders, directors, representatives and company officers) and/or (ii) the users of the Website, which we (**FIIG International**) may generally need to collect, process, use, share and store. These data categories are strictly indicative and not exhaustive.

As mentioned in the ‘Introduction’, FIIG International primarily deals with eligible counterparties and professional clients (that is, legal persons and not natural persons per se). Nonetheless, please note that FIIG International has legal and regulatory obligations to collect, process, store and at times even to disclose personal information about the individuals who own, hold, control or are otherwise responsible for or involved in the management and administration of these eligible counterparties and/or professional clients.

Moreover, we (FIIG International) may also require personal information about such individuals in order to enable us to process and provide the requested Services.

- **Identity Data** includes first name, maiden name, last name, title, identity document number, gender, nationality, corporate involvements, occupation and (in the context of the Website) username or similar identifier.
- **Contact Data** includes residential address, email address and contact numbers.

As indicated, in the context of our typical clients – eligible counterparties and professional clients – we may collect **Identity and Contact Data** about the following persons:

- beneficial owners, shareholders and individuals who otherwise exercises control;
- directors, company officers
- legal and judicial representatives, authorised signatories;
- external advisors, banks, standard settlement instructions

- **Compliance Data** includes the following due diligence information and documentation relating to our clients and/or their respective beneficial owners and shareholders, directors, representatives, company officers: (i) copy of an identity document, (ii) copy of a recently issued utility bill, (iii) professional references, (iv) tax domicile status, (v) KYC’ (database) checks and (vii) any other documentation or information which may be mandated from time to time by the Prevention of Money Laundering Act (Chapter 373 of the Laws of Malta) (“**PMLA**”), the Prevention of Money Laundering and Funding of Terrorism Regulations (“**PMLFTR**”), the Financial Intelligence Analysis Unit (“**FIAU**”), the Malta Registry of Companies (“**RoC**”), the MFSA and/or any other competent authority (including overseas authorities) or related legislation.

- **Service Data** includes the following information about our clients:

(i) the client’s professional requirements, needs, situation, plans, interests and targets or objectives; and

(ii) the Services requested by, and provided to, the client.

- **Financial Data** includes the bank account details of the client and details about payment methods used by the client and, as may be necessary under the circumstances, the financial status and creditworthiness of the client.
- **Transaction Data** includes details about (i) invoices issued to the client, (ii) payments made to and from the client and (iii) any outstanding invoices due by the client.
- **Usage Data** includes details about how the client uses our Services.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices which you (whether a client or otherwise) use to access and browse the Website.
- **Website Visit Data** includes the full Uniform Resource Locators (URL), clickstream to, through and from the Website (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us or our third parties and your communication preferences. This may include information whether you have subscribed or unsubscribed from any of our mailing lists, attended any of our events, or accepted any of our invitations.

We will also collect, use and process any other personal information that you voluntarily choose to provide or disclose to us where relevant and necessary in order to provide the Services that you have requested from us. Any such information that we receive from you would fall under the ‘**Service Data**’ category.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific feature of the Website.

However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Notice.

If you fail to provide personal data

Where we need to collect personal data about you by law, or pursuant to the terms of our business relationship with you and/or your respective organisation, and you fail to provide that data when requested, we may not be able to service you or your respective organisation.

In certain cases, particularly where it relates to Compliance Data, we may even need to exercise our prerogative to terminate the Services or otherwise decline at the outset to enter into a business relationship with you and/or your respective organisation (as may be applicable). We will notify you if this is the case at the time.

Special categories of personal data

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data).

Nor do we collect any information about criminal convictions and offences.

4. How is your personal data collected?

We generally use different methods to collect data from and about you including:

- **Direct Interactions.** You may give us your Identity, Contact, Compliance, Financial, Service and Marketing and Communications Data when you and/or your respective organisation enter into a business relationship with us, register as a client, fill in our forms, or when you correspond with us by post, phone, email or otherwise during face-to-face meetings. This includes personal data you provide when you and/or your respective organisation:
 - approach us in the context of our service offerings;
 - discuss with us the particular Services that you and/or your respective organisation may require (whether via meetings, telcos, email or correspondence);
 - enter into a business relationship with FIIG International;
 - request and receive our Services;
 - request further assistance or other services from us;
 - contact us with complaints or queries;
 - complete an enquiry form;
 - submit the Compliance Data that we request;
 - request marketing to be sent to you;
 - express interest and/or attend any of our hosted events;
 - participate in a survey or our webinars;
 - subscribe to our newsletters and updates;
 - give us some feedback.
- **The service provision to you or to your organisation.** This may encompass all of the data categories listed in Section 3 (namely, Identity, Contact, Compliance, Service, Financial and Transaction Data).
- **During the course of our dealings with you.** This may encompass most of the data categories listed in Section 3, but will generally vary on a case-by-case basis.
- **Automated technologies or interactions.** When you interact with the Site, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect this personal data by using cookies, server logs and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
 - **Technical Data** from the following parties:
 - (a) analytics providers;
 - (b) advertising networks; and
 - (c) search information providers.
 - **Financial and Transaction Data** from you or our banks.
 - **Identity, Contact, Compliance and Service Data** from you, publicly available sources such as public court documents, the RoC, company house and company registers of other jurisdictions, and from electronic data searches, online KYC search tools (which may be subscription or license based), anti-fraud databases and other third party databases, sanctions lists and general searches carried out via search engines (e.g. Google).
 - **Identity, Contact, Compliance and Service Data** from you, our advisors and KYC service providers.

If you attend an event or meeting at any of our offices, we may hold images of you captured by our CCTV cameras.

5. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where you and/or your respective organisation wish to enter into a business relationship with us.
- Where we are providing you and/or your respective organisation with the requested Services.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with our legal and professional obligations to third parties (this includes our professional obligations and duties to regulators and in respect of mandatory external reporting).

We do not generally rely on consent as a legal basis for processing your personal data, other than in relation to sending third party direct marketing communications. You have the right to withdraw consent to such marketing at any time by contacting us compliance@fiig.com, as indicated above under ‘**Contact Details**’.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data pursuant to more than one lawful ground or basis, depending on the specific purpose for which we are using your data. Please contact us at compliance@fiig.com if you need details or wish to enquire about the specific lawful basis we are relying on to process your personal data where more than one lawful basis has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
(a) To determine whether FIIG International will enter into a business relationship with you and/or your respective organisation; (b) To determine whether FIIG International can provide you with the requested Services; (c) To enter into a business relationship with you and your respective organisation.	(a) Identity; (b) Contact; (c) Compliance; (d) Service; and (e) Financial.	(a) Performance of a contract with you or in order to take steps at your request prior to entering into such a contract. (b) Necessary for our legitimate interests (to determine whether we want to enter into a business relationship with you or your respective organisation, to determine whether we can provide the requested Services, to verify ability to meet financial commitments that may result from the scope of the requested Services).
(a) To establish and verify your identity (primarily applicable to the owners and representatives of our professional clients and eligible counterparties). (b) To fulfil our other internal compliance policies and requirements; (c) To fulfil any licensing requirements	(a) Identity; (b) Contact; (c) Compliance; (d) Service** **provided that we	(a) Necessary to comply with a legal obligation. (b) Necessary for our legitimate interests (to establish and verify the identity of our clients (including beneficial owners, shareholders, representatives and other involved individuals) even where the requested assistance does not amount to a ‘relevant activity’ – namely, for

<p>which may be imposed on us, whether now or in the future (as an entity licensed and authorised by the MFSA);</p> <p>(d) To comply with our obligations under the PMLA, PMLFTR and others laws or regulations that may be applicable to us in terms of client due diligence and AML requirements; and</p> <p>(e) To fulfil any external mandatory reporting obligations that we may have to the FIAU, the MFSA, the RoC, the Police and any other (including overseas) public, regulatory, law enforcement or tax authority</p>	<p>are exempted from confidentiality and any applicable professional secrecy obligations in case of disclosure and reporting.</p>	<p>internal risk assessment and management).</p>
<p>(a) To provide you and/or your respective organisation with the requested Services; and</p> <p>(b) To improve the provision of those Services to you and/or your respective organisation.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Compliance;</p> <p>(d) Service.</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary to comply with our professional obligations and duties.</p>
<p>(a) For billing and invoice purposes;</p> <p>(b) To collect and recover money which is owed to us (debt recovery).</p> <p>(c) Internal record keeping (including files).</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Service;</p> <p>(d) Financial;</p> <p>(e) Transaction.</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary to comply with a legal obligation (accounting and other record-keeping requirements).</p> <p>(c) Necessary for our legitimate interests (to recover debts due to us, to keep track of the Services provided to the client, their status, outcome and any developments, and to be able to revisit such matters if new issues arise).</p>
<p>To manage our relationship with you (as a client or where the client is your respective organisation), which may include to:</p> <p>(a) notify you about changes to our terms of business or privacy notices;</p> <p>(b) deal with your enquiries, requests, complaints or reported issues;</p> <p>(c) contact you in the course of providing the requested Services;</p> <p>(d) ask you to participate in a survey;</p> <p>(e) request feedback from you;</p> <p>(f) advise you of industry and legislative updates,</p> <p>(g) inform you about our events;</p> <p>(h) provide you with information about our</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Service;</p> <p>(d) Transaction;</p> <p>(d) Usage;</p> <p>(e) Marketing and Communications.</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary for our legitimate interests (for client relationship handling and management, to study business growth and possible trends regarding our service areas, to enable a review and assessment of our services and products, to develop and grow our business).</p>

<p>Services, and</p> <p>(h) provide you with any other information or materials which you have requested to receive from us.</p>		
<p>(a) To detect, prevent and/or report fraud or any other criminal activity that comes to our knowledge and attention.</p> <p>(b) To assist and cooperate in any criminal or regulatory investigations against you, as may be required of us.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Compliance;</p> <p>(d) Service;</p> <p>(e) Financial; and</p> <p>(f) Transaction.</p>	<p>(a) Necessary to comply with a legal obligation.</p>
<p>To administer and protect our business and the Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Usage;</p> <p>(d) Technical; and</p> <p>(e) Website Visit.</p>	<p>(a) Necessary for our legitimate interests (for running and administering our business (including IT support), systems administration, network security, to prevent fraud and to maintain the confidentiality of communications, and in the context of a business reorganisation or group restructuring exercise).</p> <p>(b) Necessary to comply with a legal obligation.</p>
<p>(a) To carry out market research campaigns;</p> <p>(b) To market our Services to you by email or other means if you have subscribed to one of our mailing lists (where you and/or your respective organisation are not a client);</p> <p>(c) To deliver relevant Website content and advertisements to you, and measure or understand the effectiveness of the advertising that we serve to you.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Usage;</p> <p>(d) Technical;</p> <p>(e) Website Visit;</p> <p>(f) Marketing and Communications.</p>	<p>(a) Necessary for our legitimate interests (to develop our lines of services and grow our business, to define our clients, to keep our services, products and the Website updated and relevant, to inform our marketing strategy.).</p> <p>(b) On the basis of your consent, in the absence of a relationship.</p>
<p>To permit FIIG International to pursue available remedies or limit any damages that FIIG International may sustain.</p>	<p>(a) Identity;</p> <p>(b) Contact;</p> <p>(c) Assistance;</p> <p>(d) Financial;</p> <p>(e) Transaction;</p> <p>(f) Usage;</p> <p>(g) Marketing and Communications.</p>	<p>(a) Performance of a contract with you.</p> <p>(b) Necessary for our legitimate interests.</p>

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“**Legitimate Interest**” means our interest to conduct and manage our business affairs appropriately and responsibly, to protect the reputation of our business, and to provide our customers with the best possible service and the users of the Website with a safe and secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us at the following email address: compliance@fiig.com

“**Performance of Contract**” means processing your data where it is necessary for the performance of a contract to which you and/or your respective organisation are a party, or to take steps at your request before entering into such a contract. This includes our Terms of Business [fiig.com](https://www.fiig.com).

“**Comply with a legal obligation**” means processing your personal data where it is necessary to comply with a legal or regulatory obligation to which we are subject.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around advertising and marketing. Through your Identity, Contact, and the Services we provide we are able to form a view on what we think you or your respective organisation may want or need. This is how we then decide which of our Services may be relevant or of interest to you and/or your respective organisation.

You may **receive marketing communications** from us (which may consist of newsletters, industry and legislative updates, mailshots, publications and/or information about our events, seminars and webinars) where:

- you or your respective organisation have entered into a business relationship with FIIG International; and
- provided you have not opted out of receiving marketing from us (see **your right to object** below).

Where the above does not apply to you, we will only send you our marketing communications where you have expressly consented to receive them from us.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third parties (excluding our affiliated or related entities) for marketing purposes.

Opting out

You can ask us to stop sending you marketing communications (**unsubscribe**) at any time by following the opt-out (**unsubscribe**) links on any marketing communication sent to you.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the Website may become inaccessible or may simply not function properly.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose, or we are obliged to process your data by applicable laws or court or regulatory orders.

If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at compliance@fiig.com.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal data without the need to obtain your consent, in compliance with the above rules, where this is required or permitted by law.

6. Disclosures of your personal data

We may have to grant access to, disclose or share your personal data with the parties set out below for the purposes set out in the table in **Section 5** above:

- Our parent company **FIIG Securities Limited**;
- Other entities involved in the provision of the Services;
- **Suppliers and external agencies** that we engage to process information on our or your behalf, including to provide you with the information and/or materials which you may have requested.
- **Service providers**, including data capture providers (for MIFID2 compliance), platform infrastructure providers, KYC service providers (identity verification services), systems administration services and general IT support.
- Professional advisers such as legal counsel, bankers, professional indemnity insurers, brokers and auditors.
- Regulators and authorities (local and overseas), including the Courts of Malta, the Commissioner for Revenue, the FIAU, the MFSA, the RoC and the Police Authorities.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets (**successors in title**). Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this Notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

As mentioned, we outsource various operational activities to our parent company **FIIG Securities Limited** (“**FIIG Security**”) (such as KYC checks and other due diligence).

Given that **FIIG Securities Limited** is based in Australia, this may therefore involve transferring your personal data:

- from FIIG International within the European Union (“**EU**”) (the data exporter);
- to FIIG Security outside the European Economic Area (“**EEA**”) (the data importer)

To regulate these data transfers, FIIG International and FIIG Security have entered into and executed standard contractual clauses (“SCCs”) that have been approved by the European Commission.

Otherwise, we do not generally transfer your personal data to entities outside the EEA except as may be necessary to: (i) provide the requested Services, (ii) fulfil our contractual obligations to you or your respective organisation, (iii) exercise and enforce our contractual rights, (iv) comply with our legal or regulatory obligations or (v) assert, file or exercise a legal claim. Where we do need to transfer your personal data to outside the EEA (whether for these stated purposes or any other purpose listed in **Clause 5** above), we will ensure a similar degree of protection is afforded to that personal data by ensuring at least one of the following safeguards applies or is otherwise implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- In the absence of an adequacy decision, we will use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the U.S., we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at compliance@fiig.com if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed (**safeguard its integrity and confidentiality**). We also regularly review and, where practicable, improve upon these security measures.

We also limit access to your personal data to strictly those employees, agents, contractors and third parties that have a professional ‘need-to-know’. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. All our employees and agents have received appropriate training on data protection.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it (the provision of the Services and the ongoing performance of our business relationship with you) and, **thereafter**, for the purpose of satisfying any legal, accounting, tax, anti-money laundering and regulatory reporting requirements or obligations to which we may be subject and/or to the extent that we may also need to retain your personal data to be able to assert, exercise or defend possible future legal claims against or otherwise involving you.

By and large, our retention of your personal data shall not exceed the period of **six (6) years** from the termination of the business relationship. This retention period enables us to make use of your personal data for AML reporting obligations to the FIAU (a **legal obligation**) and/or for the assertion, filing or defence of possible legal claims by or against you or your respective organisation (taking into account applicable statutes of limitation). In certain cases, we may need to retain personal data for a period of up to **eleven (11) years** in order to comply with applicable accounting and tax laws (this will primarily consist of Financial and Transaction Data). There may also be instances where the need to retain personal data for longer periods, as dictated by the nature of the services provided.

In some circumstances you can ask us to delete your data. See **Request erasure** below for further information.

Kindly contact us at compliance@fiig.com for further details about the retention periods that we apply.

Data Minimisation

To the extent possible, we may anonymise the data which we hold about you when it is no longer necessary to identify you from the data which we hold about you. In some circumstances, we may even pseudonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction (**rectification**) of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact us at **compliance@fiig.com**.

No fee is usually charged

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may simply refuse to comply with your request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within a period of one month from the date of receiving your request. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

You have the right to:

(i) Request access to your personal data (commonly known as a “*data subject access request*”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

You may send an email to **compliance@fiig.com** requesting information as the personal data which we process. You shall receive one copy free of charge via email of the personal data which is undergoing processing. Any further copies of the information processed shall incur a charge of €10.00.

(ii) Right to information when collecting and processing personal data about you from publicly accessible or third party sources. When this takes place, we will inform you, within a reasonable and practicable timeframe, about the third party or publicly accessible source from whom we have collected your personal data.

(iii) Request correction or rectification of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and/or updated, though we may need to verify the accuracy of the new data you provide to us. As mentioned, it is in your interest to keep us informed of any changes or updates to your personal data which may occur during the course of your relationship with us, since this may otherwise impair our ability to provide you and/or your respective organisation with the requested Services or the quality thereof.

(iv) Request erasure of your personal data. This enables you to ask us to delete or remove personal data where:

- there is no good reason for us continuing to process it;
- you have successfully exercised your right to object to processing (see below);
- we may have processed your information unlawfully; or
- we are required to erase your personal data to comply with local law.

Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. These may include instances where the retention of your personal data is necessary to:

- comply with a legal or regulatory obligation to which we are subject; or
- establish, exercise or defend a legal claim.

(v) Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes (as under the ‘**Marketing**’ in **Section 5** above).

In some cases, we may demonstrate that we have compelling legitimate grounds to process your personal information that override your rights and freedoms.

(vi) Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;
- where our use of the data is unlawful but you do not want us to erase it;
- where you need us to hold onto the data even if we no longer require it, as you need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.

(vii) Request the transfer (data portability) of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

(viii) Withdraw your consent at any time where we are relying on consent to process your personal data (which will generally not be the case). This will **not** however affect the lawfulness of any processing which we carried out before you withdrew your consent. Any processing activities that are not based on your consent will remain unaffected.

Kindly note that none of these data subject rights are absolute, and must generally be weighed against our own legal obligations and legitimate interests. If a decision is taken to override your data subject request, you will be informed of this by our data protection team along with the reasons for our decision.

11. Conclusion

We reserve the right to make changes to this Notice in the future, which will be duly notified to you. If you have any questions regarding this Notice, or if you would like to send us your comments, please contact us today or alternatively write to our data protection team using the details indicated in this Notice.