

**GENERAL PRIVACY NOTICE  
ALLEA GROUP**

## General Privacy Notice

We are ALLEA GROUP and we are committed to protecting your privacy. In this privacy policy, we set out how we collect your personal data, how we use it, and what rights and choices you have in relation to the personal data we hold and process.

### Who decides why and how we process your personal data?

ALLEA GROUP determines why and how we process your personal data. ALLEA GROUP consists of **Allea Holding Ltd**, **Allea Global Properties Ltd** and **Anolia Holdings Ltd**. In each case, your personal data will be controlled by the ALLEA GROUP entity which you have given instructions to, or with which you are otherwise dealing with or receiving communications from or the ALLEA GROUP entity which provides services to a third party which you are associated with, for example a company of which you are a director or shareholder.

### What personal data might we collect?

We collect different types of personal data for different reasons – this may include:

**Contact information:** Information such as your name, job title, postal address, home address where you provide this to us, business address, telephone number, mobile number, fax number and email address.

**Payment data:** Data necessary for us to process payments and implement fraud prevention measures, including credit / debit card numbers, security code numbers and other such relevant billing details.

**Business details:** Business information which we necessarily process as part of our instructions or projects we are involved in or otherwise provided by you voluntarily.

**Compliance details:** Information we are legally required to collect for compliance purposes, such as 'know your client' information, details relevant to international sanctions and restrictive measures and information about relevant and significant litigation, which may impact our ability to provide our services to you.

**Preferences:** Information about your preferences, where it is relevant to the services we provide.

**Platform information:** Your password and other related log-in details for platforms maintained by ALLEA GROUP, where you have access to any.

**Publicly available information:** Information collected from publicly available resources, including but not limited to information collected from databases we use to carry out compliance checks or credit rating agencies.

**Statutory Register Information:** Information about you on account of an interest or office you may hold in or certain relationships you may have with a corporate entity, partnership, trust or other vehicle which may be relevant to the services which we provide to you (each such entity, a **Third Party Entity**).

**Details for events:** In some cases, we may collect information about you, which may include sensitive information in relation to your health, for the purpose of tailoring our events to your needs. The processing of such data is based entirely on your consent – in the event that you do not want us to maintain such data, we may not be able to take the necessary precautions.

Regarding introducers: We collect and use personal data relating to potential clients you have introduced to us.

### **When do we collect your personal data?**

We may collect personal data about you in various cases, such as for example:

- When you or your organisation seek our services or use any of our online services;
- When you or your organisation make an enquiry through our website, in person, over email or over the telephone;
- When you attend any events we may organise, or sign up to receive communications from us;
- When a Third Party Entity engages us to provide services and you hold an office or an interest in or have certain relationships with that Third Party Entity; or
- When you or your organisation provide services to us, or otherwise offer to do so.

In some circumstances, we may collect personal data about you from third parties – for example, we may collect personal data from your organisation, other organisations with whom you have dealings including Third Party Entities, government agencies, a credit reporting agency, an information or service provider or from a publicly available record.

Also, regarding Introducers, most of the personal data we hold will be provided by you when you complete a Service Agreement.

### **How will we use your personal data?**

We will use your personal data for the following purposes (*Permitted Purposes*):

- To provide our services or things you may have requested, as instructed or requested by you or your organisation;
- To manage and administer your or your organisation's business relationship with us, including processing payments, accounting, auditing, billing and collection or support services;
- For compliance with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (such as under antitrust laws, export controls, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes;
- To provide updates, reminders, requests and directions relevant to the role or capacity in which you are interested in a Third Party Entity.
- To analyse and improve our services and communications to you;
- To protect the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and to detect security threats, fraud or other criminal or malicious activities;
- For insurance purposes;
- To monitor and assess compliance with our policies and standards;
- To identify persons authorised to trade on behalf of our clients, customers, suppliers and/or service providers;

- To comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory, law enforcement and tax reporting bodies;
- On instruction or request from your organisation or a relevant Third Party Entity;
- To communicate with you through the channels you have approved to keep you up to date on the latest developments, announcements, and other information about our services, products and technologies – including client briefings, newsletters and other information – as well as events and projects we may organise;
- To comply with court orders and exercises and/or defend our legal rights;
- Regarding Introducers, we need your data to set up and manage our Service Agreement. Also, we and our staff may access your information in order to deal with your enquiries (if any) or pay you the agreed, as per our Service Agreement, consulting fees; and
- For any purpose related and/or ancillary to any of the above or any other purpose for which your personal data was provided to us.

With regard to the following marketing activities, we will only carry on such processing where we are permitted to do so by law, or otherwise where you have opted in:

- To provide you with newsletters, updates and other general communications;
- For customer surveys, marketing campaigns, market analysis, sweepstakes, contests or other promotional activities or events; or
- To collect information about your preferences to create a user profile to personalise and foster the quality of our communication and interaction with you (for example, by way of newsletter tracking or website analytics).

You have the opportunity to opt out of receiving communications from us at any time. We will not use your personal data for taking any automated decisions affecting you or creating profiles other than as described above.

Depending on which of the above Permitted Purposes we use your personal data for, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organisation or a Third Party Entity;
- Regarding Introducers, because processing is necessary to set up and perform our Service Agreement;
- To comply with our legal obligations (e.g. to keep pension records or records for tax purposes); or
- Because processing is necessary for purposes of our legitimate interest or those of any third party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

We may also process your data based on your consent where you have expressly given that to us.

**How will we share your personal data?**

We may share your personal data in the following circumstances:

- We may share your personal data between the ALLEA GROUP entities on a confidential basis where this is required for the purpose of providing our services, as well as for administrative, billing and other business purposes. All ALLEA GROUP Entities are based in the EU.
- If you are an ALLEA GROUP client, or you are otherwise contracted by, are an agent of, or otherwise represent an ALLEA GROUP client, we may disclose your personal data to other specialists, consultants or experts engaged in your matter.
- If we have collected your personal data in the course of providing services to any of our clients, we may disclose it to that client, and where permitted by law to others for the purpose of providing those services;
- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared;
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations;
- We may share your personal data with courts, law enforcement authorities, regulators or attorneys or other parties where it is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process;
- We may also instruct service providers within or outside ALLEA GROUP, domestically or abroad, e.g. shared service centres, software and crm systems to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. ALLEA GROUP will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers;
- We may also use aggregated personal data and statistics for the purpose of monitoring website usage in order to help us develop our website and our services.

We will otherwise only disclose your personal data when you direct us or give us permission to do so, when we are required by applicable law or regulations or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities.

### **Can you refuse to share your personal data with us?**

In general, we receive your personal data where you provide this on a voluntary basis, and there will typically be no detrimental effect for you if you wish not to provide this or otherwise withhold your consent for it to be processed. However, there are certain cases where we will unfortunately be unable to act without receiving such data, for example where we need to carry out legally required compliance screening or require such data to process your instructions or orders, or otherwise to provide you with our online services or communications.

Where it is not possible for us to provide you with what you request without the relevant personal data, we will let you know accordingly.

### **How do we keep your personal data safe?**

We take appropriate technical and organisational measures to keep your personal data confidential and secure, in accordance with our internal policies and procedures regarding storage of, access to and disclosure of personal data. We may keep your personal data in our electronic systems, in the systems of our contractors, or in paper files.

### **Personal data we receive from you about other people**

Where you provide us with the personal data of other people, such as your employees, directors of your companies, or other persons you may have dealings with, you must ensure that you are entitled to disclose that personal data to us and furthermore that, without being required to take further steps, we can collect, use and disclose that data in the manner described in this policy. More specifically, you must ensure that the individual whose personal data you are sharing with us is aware of the matters discussed in this Privacy Notice, as these are relevant to that individual, including our identity, how to get in touch with us, the purposes for which we collect data, our disclosure practices, and the rights of the individual in relation to our holding of the data.

Especially, regarding Introducers: You must ensure that you have permission to collect and pass on to us the personal data of a potential client. We will rely on you to ensure that you have a lawful basis for providing this information and have obtained consent from the prospective client to do so.

### **Transfers of personal data abroad**

ALLEA GROUP is active across the world – this means that we may transfer your personal data abroad if required to do so for the Permitted Purposes. In certain cases, this may include transferring data to countries which do not offer the same level of protection as the laws of your country (such as for example the data protection legislation of the EU/EEA).

When making such transfers, we will ensure that they are subject to appropriate safeguards in accordance with the General Data Protection Regulation (Regulation 2016/679) or other relevant data protection legislation. This may include entering into the EU Commission's Standard Contractual Clauses. Please get in touch with our Privacy Officer at [privacy@alleagroup.com](mailto:privacy@alleagroup.com) if you wish to obtain further information on the appropriate safeguards which we are adhering to.

All entities and offices within ALLEA GROUP will ensure an adequate level of protection for your personal data at all times.

### **How long do we keep your personal data?**

We delete your personal data once it is no longer reasonably necessary for us to keep it for the Permitted Purposes, or, where we have relied on your consent to keep your personal data, once you withdraw your consent for us to do so, and we are not otherwise legally permitted or required to keep the data. Importantly, ALLEA GROUP will keep your personal data as necessary for the purposes of defending or making legal claims until the end of the period during which we may retain the data and otherwise until the settlement of any such claims, as relevant.

Regarding Introducers, your personal data will be stored for a reasonable period after your Service Agreement ends so that we can fulfil our legal and statutory obligations. After this it will be securely destroyed.

We review our data retention policy on a regular basis so that we do not keep it longer than necessary.

### **What rights do you have?**

Subject to certain conditions under applicable legislation, you have the right to:

- request a copy of the personal data which we hold about you;
- have any inaccurate data we hold about you corrected;

- object or restrict our use of your personal data;
- submit a complaint if you have concerns about the way in which we are handling your data.

To do any of the above, please contact our Privacy Officer at [privacy@alleagroup.com](mailto:privacy@alleagroup.com). To enable us to process your request, we may require that you provide us with proof of your identity, such as by providing us with a copy of a valid form of identification – this is to ensure that we appropriately protect the personal data we hold from unauthorised access requests and comply with our security obligations.

We may charge you a reasonable administrative fee for any unreasonable or excessive requests we may receive, and for any additional copies of the data you may request.

### **Correcting and updating your personal data**

Where any personal data you have provided us with has changed, or where you believe the personal data we hold is inaccurate, please let us know by reaching out to our Privacy Officer at [privacy@alleagroup.com](mailto:privacy@alleagroup.com). In addition, please note that if you hold an office or are interested in or have certain relationships with a Third Party Entity to which we provide services, you and/or the Third Party Entity may have a contractual or legal obligation to notify us of any change within a prescribed time period. We cannot be responsible for any loss that may arise due to us having any inaccurate, incomplete, inauthentic or otherwise deficient personal data which you or a Third Party Entity have provided to us. Please also let us know if you wish to withdraw any request.

### **Cookies**

We may store cookies on your devices for the purposes of delivering a better user experience for you on our websites – please see our [Cookie Policy](#).

### **Get in touch**

We would be happy to hear your views about our website and this Privacy Policy – please let us know any questions, comments or clarifications you may have by reaching out to our Privacy Officer at [privacy@alleagroup.com](mailto:privacy@alleagroup.com).

### **Changes to our Privacy Policy**

This Privacy Policy was last updated on the 6<sup>th</sup> of April 2022. We have the right to update the contents of this Privacy Policy from time to time to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change. In case of updates, we will post the revised Privacy Policy on our website. Changes will take effect as soon as the revised version is made available on our websites.