

## ASTERISM WEBSITE PRIVACY POLICY

Asterism Limited (“**we**”/ “**us**”/“**Asterism**”) is a provider of fiduciary, company secretarial, administration service and other services to corporate, institutional and private investors, private individuals and family offices.

The purpose of this Privacy Policy is to inform you of the manner in which Asterism collects, processes, and shares your personal data when you visit the Asterism website at [www.asterism.mu](http://www.asterism.mu) (the "**Website**").

By using the Website and/or our services, you consent to the Processing of your Personal Data as described in this Privacy Policy.

### 1. OUR PRIVACY STATEMENT

We respect your privacy and are committed to protecting your Personal Data, as defined in the data protection laws in force in Mauritius, that is the Data Protection Act, 2017 (the “**Act**”), as amended from time to time.

### 2. DEFINITIONS

- 2.1. Personal Data: Any information relating to an identified or identifiable natural person.
- 2.2. Processing: Any operation or set of operations which is performed on Personal Data or on sets of Personal Data.
- 2.3. Data subject: A natural person whose Personal Data is being Processed.

### 3. PERSONAL DATA THAT WE COLLECT ABOUT YOU

We may collect personal information from you in the course of our business, including through the use of our Website when you contact us or request information from us, or when you contact us to obtain our services. We only collect the information that we actually need such as but not limited to, information provided to us for KYC and AML-CTF purposes upon onboarding or during the course of our contractual relationship.

We do not collect any **Special Categories of Personal Data** about you (this includes details about race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about health, and genetic and biometric data) except to the extent required by applicable laws.

### 4. HOW WE USE YOUR PERSONAL DATA

We will only use your Personal Data when the law allows us to (i) on contractual necessity, (ii) on legitimate grounds not overridden by your data protection interests and/or (iii) with your Consent, for the following:

- 4.1. To fulfil our legal obligations.
- 4.2. To manage our relationship with you and our clients.
- 4.3. To improve this Website.
- 4.4. To provide and improve our services to you and to our clients.
- 4.5. To compile anonymous statistics, for example, website usage statistics.
- 4.6. To keep you up to date of our services.
- 4.7. For the purposes of recruitment.

4.8. For other legitimate business purposes.

## 5. DISCLOSURES OF YOUR PERSONAL DATA

We do not share your Personal Data with any third parties.

We may be required to share your Personal Data to third parties such as (i) our employees (ii) our professional advisors who may include our accountants, auditors, lawyers, insurers and bankers, (iii) our preferred service providers (such as IT systems suppliers and support) and (iv) any public or enforcement authority in Mauritius or elsewhere, or in case of a court, administrative or governmental order to do so.

## 6. HOW WE PROTECT YOUR PERSONAL DATA

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.

In particular, our preventive and protective measures include:

- i. the pseudonymisation and encryption of Personal Data; and
- ii. the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services through our disaster recovery management procedure.

In addition, we limit access to your Personal Data to those persons who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality.

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.

The security of your Personal Data is important to us. However, it is important to note that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## 7. YOUR LEGAL RIGHTS

7.1. You have the right to:

- 7.1.1. **Request access** to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- 7.1.2. **Request correction** of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected.
- 7.1.3. **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 also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. However please note 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.

- 7.1.4. **Object to processing** of your Personal Data where we are relying on a legitimate interest 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. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 7.1.5. **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 the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
  - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 7.1.6. **Request the transfer** 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. 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.
- 7.1.7. **Withdraw consent at any time** where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent. We will try to respond to all legitimate requests within one month. Occasionally it could take us longer than one 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.
- 7.1.8. **Lodge a complaint** at any time with the Data Protection Commissioner of Mauritius ("**DPC**").

**7.2. If you wish to exercise any of the rights set out above or need any clarification thereon, please contact us. We would appreciate the chance to deal with any of your concerns before you approach the Data Protection Commission, so please contact us in the first instance. We will try to respond to all legitimate requests within 1 (one) month. It may take us longer than 1 (one) month if the request is particularly complex or if you made a number of requests. In this case, we will notify you and keep you updated.**

## **8. DATA RETENTION**

We will only retain your Personal Data for as long as reasonably necessary to fulfil meet our obligations under contractual obligations to you, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements.

To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or reporting requirements.

We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you. We also retain Personal Data beyond the duration of the services that we provide as necessary to meet our legal and regulatory obligations to retain such information under applicable law.

Where you have consented to receive updates and similar materials from us, any Personal Data held by us for that purpose will be kept by us until such time that you notify us that you no longer wish to.

## **9. 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 statements. When you leave the Website, we encourage you to read the privacy policy of every website you visit and application you use.

## **10. COOKIES**

We use cookies and/or similar technologies to analyse customer behaviour, administer the Website, track users' movements around the Website, and to collect relevant information about users to assist with current or future transactions. This is done to personalise and enhance your experience of using the Website. 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 not function properly.

## **11. CHILDREN**

Asterism does not target anyone under the age of 18 ("**Children**") with our services. We do not intend to collect or knowingly collect Personal Data from Children.

## **12. TRANSFER OF YOUR PERSONAL DATA**

If you are located outside Mauritius and choose to provide your Personal Data to us, please note that we will protect your Personal Data in accordance with the applicable laws in Mauritius.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We do not transfer your personal data outside Mauritius.

## **13. OUR CONTACT INFORMATION**

If you have any questions about our Privacy Policy, including any requests to exercise your legal rights, please contact our Data Protection Officer, Mrs. Martine de Fleuriot de la Colinière, on the following:

Phone: +230 260 0160

Email: [info@asterism.mu](mailto:info@asterism.mu)

Address: 3rd Floor, Edith Cavell Street, Port-Louis, Mauritius

## **14. GOVERNING LAW AND JURISDICTION**

This Privacy Policy shall be construed, interpreted and applied in accordance with, and shall be governed by the laws applicable in the Republic of Mauritius.

The formation, interpretation and performance of the present Privacy Policy shall be governed by the laws of Mauritius. Any disputes, controversy or claim arising out of or relating to these Privacy Policy, or the breach,

or invalidity thereof shall be resolved by an appropriate court of law in Mauritius. The Parties hereto expressly agree to the jurisdiction and venue of such courts in Mauritius.

**15. CHANGES TO THIS PRIVACY POLICY**

We reserve the right to update this Privacy Policy from time to time, at our absolute discretion. You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on the Website.