



# Privacy Policy

## Introduction

Finductive Ltd is the data controller for all of your personal data that is held by us. We respect your privacy and are committed to protecting your personal data.

This policy is our overarching Privacy Notice and will give information about what, how and why we collect and process the data, how we store the data, how long we keep it for and who we share it with.

For the purposes of this policy, Finductive Ltd shall be referred to as the “Data Controller/ we/ us/ our”, and Account Holders, prospective clients, employees or any person sharing their personal information with us shall be referred to as the “Data Subjects/ you/ your”.

We collect and process personal data for the purpose of engaging business, regardless of the extent or the outcome of such engagement.

## Personal data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect and process the following data about you:

- i. Identification related data e.g. name, username or similar identifier, date of birth, gender, country identification documents (photo ID, passport, national ID card)
- ii. Contact data including postal address, email address and telephone numbers
- iii. Data about your education, profession or work
- iv. Due Diligence information, including country of origin, residence, citizenship, source of funds and wealth
- v. Financial information
- vi. Technical and usage data
- vii. Communications data including your communications preferences in receiving updates from us

We do not collect personal information on children aged under 16, unless a parent or legal guardian has given his/her consent for this.

## Cookies

### What are cookies?

To ensure that content from our website is presented in the most effective manner for you and for your computer, our website uses cookies to distinguish you from other users of our website.

Cookies are small text files that are stored on your computer or mobile device by websites that you visit. They are widely used in order to make websites work, or work more efficiently (including giving you a more personalised website experience) and allow improving the websites.

### How do we use cookies?

Cookies do not contain any information that personally identifies you, but personal information that we store about you may be linked, by us, to the information stored in and obtained from cookies, to provide you with a better browsing experience and analyse return visitor behavior.

You can choose to decline the use of cookies via the pop-up banner appearing on the bottom of the website, which requests you to accept or decline the storage of cookies on your device. However, turning off one or more types of cookies will not delete any that have been downloaded in the past. We may still use data we collected up to that point, but will stop collecting new data. You may delete any stored cookies via your browser settings.

### Types of Cookies

We use:

- i. **Session cookies** (temporary cookies which only exist during the time you use our website until you close your browser, to remember what you chose on any page, avoiding the need to re-enter information and improve your experience whilst using our website)
- ii. **Persistent cookies** (cookies which stay on your device after you have closed your browser and help us recognize users when they return to our website, track your viewing patterns in order to improve your user experience and provide data for our analytics programs)

### Third party websites

Our website may link through to third party websites that may also use cookies over which we have no control. We recommend that you check the privacy and cookies policies of those websites for information about the cookies they may use and the collection of personal data. We cannot accept any responsibility for any content contained in these third party websites.

## How and why we process your personal data

We will only process your personal data consistently with data protection laws and for the following purposes and lawful reasons:

- i. When we have your consent to process your personal information for a specific purpose
- ii. When we need to process your personal information to enter into or administer a contractual agreement we have with you
- iii. When we need to process your personal information to comply with our legal obligations including:
  - carrying out customer due diligence and screening in line with our legal responsibilities
  - preventing unauthorised access and/or unauthorised administration of your funds
  - assisting any public authority, regulatory, judicial or criminal investigation body
- iv. When processing of your personal information is necessary for the performance of a task carried out in the public interest such as the prevention and detection of financial crime, fraud, money laundering and terrorist activity and the provision of financial and other services to persons who may be subject to sanctions. This includes but is not limited to the verification of customer's identity and suitability for the product.
- v. When we need to pursue our legitimate interest such as:
  - filing of regulatory returns to the relevant competent authorities
  - providing information for audit or investigative purposes
  - safeguarding our assets, belongings and possessions
  - providing and administering the Website and related services and managing internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes, and developing the Website and our products and services.

## Who your information may be shared with

Your personal data may be shared with, but not limited to:

- i. our employees and representatives
- ii. our affiliates
- iii. our third-party business partners, service providers, agents, delegates, sub-contractors and/ or any other party which may be engaged or otherwise used by us for any purpose in connection with our remit

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets
- If Finductive Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

iv. public authorities, regulatory, judicial or criminal investigation bodies, in line with our legal obligations

## Details of transfers to third country and safeguards

It may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries within and/or outside of the EU/ EEA.

Any transfers made will be in full compliance with all aspects of the data protection law.

## Marketing

Subjects to your consent, we may contact you by post, email, telephone, text messages and other electronic means to inform you about latest events, updates and offers related to our operations or activities or services supplied by any associates, agents and by other carefully selected third parties.

You may opt out of such marketing services at any time by writing to our office or sending such request by e-mail to [dpo@finductive.com](mailto:dpo@finductive.com)

## Retention period for information collected

We will only hold information in accordance with the applicable legal requirements. We will only retain your information for as long as we need to.

## Your rights

You have the right to:

- i. ask for a copy of any information we hold about you
- ii. ask for any information we hold about you to be changed if it is inaccurate
- iii. request restricting our use of your information in certain circumstances (e.g. if you want us to establish the data's accuracy)
- iv. withdraw consent at any time, where data is processed on the basis of your consent
- v. object to the processing of your personal data in certain circumstances (e.g. for direct marketing)
- vi. object to being subject of automated decision making
- vii. ask us to delete any information we hold about you, although this is not an absolute right and we may need to continue to hold your information – we will tell you why if this is the case
- viii. ask us, in appropriate circumstances, to transfer your personal information to another organisation indicated by you

You can exercise any of your rights by contacting our data protection officer at [dpo@finductive.com](mailto:dpo@finductive.com). Once we receive your request, members of our data protection team will endeavour to get back to you as soon as possible to confirm receipt.

If you are unhappy about how we handle your personal data you can complain to the Office of the Information and Data Protection Commissioner (IDPC). Further information about the services offered by IDPC and the conditions for using such services can be found at [idpc.org.mt](http://idpc.org.mt)

## Changes to our Privacy Policy

We keep our Privacy Policy under regular review, and we will make new versions available on our website.

## Document Information

This Policy shall be reviewed at least annually and revised as necessary and appropriate.