

Sovereign Corporate Services Limited

Privacy Notice for provision of shared services.

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it to provide outsourcing services including the provision of Client Accounting, Finance, Corporate Admin, Compliance, Investment Admin and Pension Admin that is within the business model. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the 'How to contact us' section.

2. What Personal Data is

'Personal Data' means any information relating to a data subject. A data subject is a natural person who is identified or identifiable.

'Special Category Data' is any information that reveals personal data relating to racial or ethnic origin, political opinion or adherence, religious or philosophical beliefs, membership of a trade union, physical or mental health or condition, sexual orientation, practices or preferences, genetic or biometric data that is uniquely identifying, commission or proceedings related to the commission of a criminal offense.

3. How we collect your Personal Data

We collect personal data from a shared database post access being approved by the relevant offices.

We do not collect personal data from third parties.

4. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:

Categories of individuals/companies	Categories of Personal Data	Purpose of Processing/Collecting	Lawful Basis	Retention Period
Client	Contact details, identification document, work email address, Senior personnel representing the company	To build in Service agreement with the client	Contract	7 years or until a change of representative.
Client	End Client Name, address, contact details, identification document, personal/work email address, Source of Wealth and Source of Funds including Curriculum Vitae	Transferring data from shared mailbox to Client OVP	Contract	Dependent on office and jurisdiction based on their legislation. Data that is saved locally is subject to 7 years retention period.
Client	Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)	Drafting management accounts or financial statements for the end client following request	Contract	Personal data is saved locally, all retention requirements are set as per office and jurisdiction.

5. Cookies

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

6. Sharing your Personal Data

In the course of providing you with this product/service – we may need to share your Personal Data with the following third parties:

The Banks
The Mauritian Regulators
Any other Regulators
Lawyers
Accountants
Property Managers
Other Sovereign entities

7. Retention

We will retain your personal data for as long as is necessary to provide the services which you have requested from us.

As per Mauritian legislation, all documents should be retained 7 years post termination of contract.

However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to secure your personal data for a longer period where this is required in relation to legal claims, although this is rare.

- Any hard copies would be archived with a contracting party whereby the personal information would be disposed post agreed timeline.
- Any soft copies would be saved on Company's server which are protected by a robust cyber framework.

8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other [Group offices](#).

We may also share your personal data with 3rd part service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

Personal data may only be transferred outside of Mauritius when the conditions for transfer are as set out in section 36 of the Data Protection Act.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain.

You have certain rights in relation to the processing of your Personal Data, including to:

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a “Subject Access Request”)
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to lodge a complaint**
You have the right to lodge a complaint with the Data Protection Office, if you believe STML is infringing the data protection laws or you are concerned about the way in which we are handling your personal data.

The supervisory authority in the Republic of Mauritius is the Data Protection Office headed by the Data Protection Commissioner.

You can further contact details on their website. The address is Level 5, SICOM Tower, Wall Street, Ebene Cyber City, Ebene, Mauritius.



Telephone: 4600251

Email dpo@govmu.org

How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us and our Data Protection Officer

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact our Data Protection Officer as follows:

H21 Home Scene Building, Healthscape • Forbach

Email address: kseeruttun@sovereigngroup.com

Phone number: +230 2443210

11. Changes to this privacy notice

12. We keep our privacy notice under regular review to make sure it is up to date and accurate. We will update this notice accordingly on our website.