

Privacy Notice

A privacy notice (Notice) is a public statement of how our organization applies data protection principles to processing data.

• Who is collecting the data?

This Notice applies to personal information collected by members of Dextra Group.

What data is being collected?

We'll only collect your information in line with relevant regulations and law. We may collect it from a range of sources and it may relate to any of our products or services you apply for, currently hold or have held in the past. We may also collect information about you when you interact with us, e.g. visit our websites, call us or visit one of our subsidiaries, or ask about any of our products and services. Some of it will come directly from you. We might also get some of it from publicly available sources.

The information we collect may include:

1. personal details, e.g. name, previous names, gender, date and place of birth;

2. contact details, e.g. address, email address, landline and mobile numbers; information concerning your identity e.g. photo ID, passport information, National ID card and nationality (e.g. Authentication authorized signatory in document etc);

3. other information about you that you give us by filling in forms or by communicating with us, whether face-to-face, by phone, email, online, or otherwise.

4. investigations data, e.g. due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals and/or organizations, including emails, voicemail, live chat, etc.;

5. records of correspondence and other communications between us, including email, live chat, instant messages and social media communications.

Will the data be shared with any third parties?

We may share your information with others where lawful to do so including where we or they:

- 1. need to in order to provide you with products or services you've requested;
- 2. have a public or legal duty to do so;

3. need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests;

4. have a legitimate business reason for doing so;

5. have asked you for your permission to share it, and you've agreed.

We may share your information for these purposes with others including:

1. other Dextra Group companies and any sub-contractors, agents or service providers who work for us or provide service to us;

2. financial institution;

3. any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;

4. law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;

5. other parties involved in any disputes, including disputed transactions;

6. fraud prevention agencies.

How will the information be used?

We'll only use your information where we have your consent or we have another lawful reason for using it. These reasons include where we:

- 1. need to pursue our legitimate interests;
- 2. need to process the information to carry out an agreement we have with you;
- 3. need to process the information to comply with a legal obligation;
- 4. believe the use of your information as described is in the public interest
- 5. need to establish, exercise or defend our legal rights;
- 6. need to use your information for insurance purposes.

The reasons we use your information include to:

- 1. deliver our products and services;
- 2. carry out your instructions;

3. manage our relationship with you, including (unless you tell us otherwise) telling you about products and services we think may be relevant for you;

4. understand how you use your accounts and services; prevent or detect crime including fraud and bribery.

- 5. improve our products and services;
- 6. protect our legal rights and comply with our legal obligations;
- 7. recover money which you owe.

How long will the data be stored for?

We keep your information in line with local law. We may need to retain your information for a longer period where we need the information to comply with regulatory or legal requirements or where we may need it for our legitimate purposes, e.g. to help us respond to queries or complaints, fighting fraud and bribery crime, responding to requests from regulators, etc

What rights does the data subject have?

You have a number of rights in relation to the information that we hold about you. These rights include:

the right to access information we hold about you and to obtain information about how we process it;
in some circumstances, the right to withdraw your consent to our processing of your information, which you can do at any time. We may continue to process your information if we have another legitimate reason for doing so;

• in some circumstances, the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;

• the right to request that we rectify your information if it's inaccurate or incomplete;

• in some circumstances, the right to request that we erase your information. We may continue to retain your information if we're entitled or required to retain it;

• the right to object to, and to request that we restrict, our processing of your information in some circumstances.

Again, there may be situations where you object to, or ask us to restrict, our processing of your information but we're entitled to continue processing your information and/or to refuse that request. You can exercise your rights by contacting us using gdpr@dextragroup.com

How can the data subject raise a complaint?

Should you want to raise a complaint, do not hesitate to send it to gdpr@dextragroup.com.