## Ivy Ventures Ltd - Privacy Policy

### Introduction

This is the Privacy Policy of Ivy Ventures Ltd, company number C75397. We are dedicated to safeguard the privacy of our customers and visitors to this website. This policy sets out how we will treat your personal information.

If you have any questions about this privacy policy or our treatment of your personal data, please contact us:

- By email to: <a href="mailto:compliance@ivyventures.eu">compliance@ivyventures.eu</a>
- By post to: Compliance Department, Ivy Ventures Ltd Level 1, Blue Harbour Business Centre Ta'Xbiex Yacht Marina, Ta'Xbiex, Malta
- By telephone: +356 79239224

By submitting any personal information to us, you agree to the use by us of your personal information in accordance with the terms of this Privacy Statement.

#### What information do we collect?

We collect, store and use the following kinds of personal data:

- information about your computer and about your visits to and use of this website, such as your IP address, geographical location, time and date of visit, browser type, length of visit and number of pages visited, source of referring site, dwell time;
- information relating to transactions carried out between you and us on or in relation to this website including information relating to the supply of our services;
- information that you provide to us for the purpose of registering with us (including: your name, email, contact number, occupation, employer, and postal address);
- information that you provide to us for the purpose of subscribing to our website, email alerts and/or periodical newsletters (including: your name and email address):
- Information required to complete our services that we will request directly from you.
- any other information that you choose to provide us with.

# International data transfers

We may collect data to be stored and processed transferred between any of the countries in which we may operate in order to enable us to use the information in accordance with this privacy policy. This may be outside of the European Union. We will ensure that there are appropriate security measures in place, including data encryption.

## Security of your personal data

We will use all reasonable endeavours to prevent the loss, misuse or alteration of your personal information. Whilst we will take all possible precautions the internet is an insecure environment, and we cannot guarantee the security of data sent over the internet.

## Using your personal data

We may use your personal information to:

- Manage the website;
- Improve our security
- improve your browsing experience by personalising the website;
- enable your use of the services available on the website;
- send you general (non-marketing) commercial communications;
- send you email notifications which you have specifically requested;
- send to you our marketing communications relating to our business which we think may be of
  interest to you by post, email or SMS (you can tell us at any time if you no longer require marketing
  information to be sent by emailing us at compliance@ivyventures.eu)
- provide third parties with statistical information about our users;
- deal with enquiries and complaints made by you;

to prevent fraudulent activity.

### Other disclosures

In addition to the disclosures reasonably necessary for the purposes identified elsewhere in this privacy policy, we may disclose information about you:

- to the extent that we are required to do so by law;
- in connection with any legal proceedings or potential legal proceedings;
- in order to establish, maintain or defend our legal rights (including providing information to others for the purposes of fraud prevention and mitigating potential credit risk).

## Third party websites

The website may contain links to other websites. We are not responsible for the privacy policies or practices of third party websites.

# Your rights

You can control, access or restrict the use of your data, and you have rights under this policy. You can withdraw your consent for us to contact you at any time. Please note: if you have signed a contract for us to provide a service, our contractual rights will still apply and we may contact you in relation to a cancellation fee or any outstanding monies owed to us.

We will keep your contact details following an enquiry to our website for a minimum period of three years.

We will keep your contact details following the conclusion of our services for a minimum period of three years. We may be required to keep your data for longer to fulfil our legal obligations, including our accounting requirements and our regulatory obligations, such as complaints handling.

This enables us to provide our services to you and fulfil our legal obligations. We will take reasonable technical and organisational precautions to secure your personal data and to prevent the loss, misuse or alteration of your personal data. We will store all the personal information you provide on our secure servers that are subject to strict security requirements.

If you request the rectification, erasure or restriction of your data, we will also communicate this to any third party who your data has been disclosed to.

In exercising any of your rights, we will take action within thirty (30) days. We will need to confirm your identity before completing any action on your behalf and reserve the right to not complete action until we are satisfied that it is you that is making the request. If we cannot complete your request, we will inform you within one month and explain why.

Please note, we require certain personal information to be able to complete our services. If you do not provide this, we may not be able to fulfil our contract with you. In this event, we will explain what data is required and why. If you do not wish to provide this, we have the right to terminate your contract with us.

You can access your data at any time by submitting a Subject Access Request ("SAR"). We will confirm what data is being processed and provide you with a copy of your data. You can make this request using reasonable means, including by telephone, post or email. If you make the request by email, we will provide your information in a commonly used electronic format unless you instruct us otherwise.

If you wish to amend any inaccurate data that we hold, please notify us specifically by telephone, post or email. We will make the amendment as soon as possible. If any data held is incomplete, you can complete this at any time. We may require this to be completed to allow us to provide our services.

We can erase or "forget" your data when requested by you in the following circumstances:

 We no longer require your data (when we have finished providing any services requested by you);

- you withdraw your consent and there is no other reason for us to hold your data (please note: if you have signed a contract to complete a claim, our contractual rights will still apply and we can contact you in relation to a cancellation fee or any outstanding monies owed to us);
- you object to the processing, as described below;
- you believe your data has been unlawfully processed; or
- there is a legal obligation to erase your data.

You can make this request using reasonable means including by telephone, post or email. If you request for your data to be erased, we will confirm whether this can take place and the next steps that we will take. If we cannot erase your data, we will explain why and confirm any actions required to allow us to do so.

You can opt out at any time to stop receiving marketing from us.

You can request your data in a commonly used electronic format, and for us to transfer this to another entity or person, where we are processing your data with your consent or in accordance with a contract. This will only apply to information which is processed by automated means (e.g. by a computer). Where feasible, we will send your data directly to another entity or person.

Our supervisory authority is the Information and Data Protection Commissioner (IDPC) in respect of our obligations to protect your data. You have the right to make a complaint about our use of your data to the IDPC who will investigate this on your behalf. You can contact the IDPT through their website: www.idpc.org.mt/raise-a-concern/

If you have any queries concerning this policy and the use of your personal data please email <a href="mailto:compliance@ivyventures.eu">compliance@ivyventures.eu</a>.

# **Updating your information**

Please let us know if the personal information which we hold about you needs updating or correcting.

### Contact

If you have any questions about this privacy policy or our treatment of your personal data, please get in touch using the contact details at the top of this Privacy Policy.

# **Policy amendments**

We may update this privacy policy at any time by posting a new version on our website. You should check this page occasionally to ensure you are happy with any changes.

## Ivy Ventures Ltd - Cookie Policy

We may collect information about your computer, including where available your IP address, operating system, and browser type, for system administration and to analyse aggregate information. A cookie is a small file of letters and numbers that we put on your computer. These cookies allow us to distinguish you from other users of our websites, which helps us to provide you with a better experience when you browse our websites, and also allows us to improve our sites. The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the sites when they are using them. This helps us to improve the way our websites work, for example by ensuring that users are finding what they are looking for easily. Our cookies are not used to collect personally identifiable information about you.

We list below the cookies we use on our website and provide a brief explanation of what those cookies do. Most web browsers allow some control of most cookies through the browser settings. For more information on this, and more information about cookies in general, you may wish to visit www.aboutcookies.org.

Please be aware that restricting cookies is likely to impact on your ability to use our websites effectively and may make areas of our websites inaccessible or inoperable. The cookies we use are as follows:

utma (Unique visitor cookie) utmb (Session cookie) utmz (Campaign cookie) utmv (Visitor segmentation cookie)
utmx (Google website optimizer cookie)
CAN\_Bid (user identification cookie)
CAN\_FCld (user identification cookie)
CAN\_Sid (session identification cookie)
CAN\_qs\_tabmin (session cookie)