

## PRIVACY NOTICE – CIEL

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### PRIVACY NOTICE

CIEL Limited and its subsidiaries ("CIEL", "we", "us", "our") respect your privacy, and are committed to protecting the privacy, confidentiality and security of the personal data you provide to us when you use our website, when you contact our office, or when you otherwise interact with us.

We appreciate that the success of our business is largely dependent upon a relationship of trust being established and maintained with our stakeholders and we are committed to protect your personal data in compliance with applicable data protection laws.

We ask that you read this Privacy Notice carefully as it contains important information on how we, as data controller and processor, treat the personal data that you provide to us including how and why we collect, store, use and share your personal data, your rights in relation to your personal data and on how to contact us and the supervisory authorities in the event you have a complaint.

Except as described in this Privacy Notice, we will not, without your consent, sell or rent to any third party any of personal data.

### Who we are

CIEL Limited is a public company incorporated in Mauritius and listed on the stock exchange of Mauritius. Our registered office and principal place of business is situated at 5<sup>th</sup> Floor, Ebene Skies, Rue de L'institut, Ebene, Mauritius. We invite you to browse our website for further details on our diversified group of companies.

### Personal Data Collected

We may collect the following personal data from you in the course of our interaction, for purposes of our business operations or for purposes of responding to your requests (newsletter or job applicable) namely your name, address, contact details such as phone and fax numbers, e-mail addresses, qualifications, current employer, CV, areas of expertise, country of residence and any other personal data necessary to fulfill your special requests, and any other personal data that you choose to provide to us.

#### CIEL LIMITED

5th Floor, Ebene Skies, Rue de l'Institut, Ebene 80817, Mauritius

T (230) 404 2200 | F (230) 404 2201 | E info@cielgroup.com

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## Personal Data collected when you use our website

When you choose to receive our newsletters, we ask that you provide us with your email address. The provision of this information is purely voluntary and you may opt out of receiving our newsletters at any time by selecting the option “unsubscribe” which is available on any newsletters issued by CIEL.

When you make a job application through our website, we ask that you provide us with your name, address, contact details such as phone and e-mail addresses, qualifications, current employer, CV, areas of expertise, country of residence. The provision of this information is purely voluntary for purposes of processing your job application.

You may at any time send a written request to delete your record from our systems.

## How We Use Your Personal Data

We use your personal data in the course of our business operations and interaction with you for purposes of performing our agreement with you, assisting you with your queries or concerns, complying with any legal or regulatory obligations imposed on us, fulfilling our legitimate commercial interests, sending you promotional communications or special offers if you have consented to receiving the same, processing any job applications which you submitted through our website, promoting eventual business relationships, performing recruitment analytics with CVs received, promoting our corporate initiatives and for any other purposes for which we have your consent.

## Disclosures of Your Personal Data

We may share your personal data as follows:

- between and amongst our subsidiaries and affiliates as may relevant for the above purposes, to facilitate the operation of our business, to treat job applications, conduct internal analysis with a view to improving our company and services, but we shall only do so on a strictly need to know basis;
- our employees for purposes of fulfilling our business operations or conducting internal analysis with a view to improving our enterprise;
- our agents, advisers, accountants, auditors, lawyers, other professional advisors, contractors or third-party service providers for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- personal data of our shareholders are shared with our share registry service provider
- with any other party at your consent or at your direction

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We take great measures to ensure that all of your personal data is kept safely. We take steps to ensure that only designated persons have access to your personal data on a strictly need-to-know basis for purposes of fulfilling our agreement with you. Furthermore, all third persons with whom we share your Personal Information are under a contractual obligation with us to protect all Personal Information to which they have access.

We will share your personal data without first obtaining your express consent as follows:

- with law enforcement and other statutory authorities if required by law;
- If required or authorized by law; or
- If we suspect any unlawful activities on your part.

Where we have collected your personal data on behalf of another party the use of your personal information by that party is governed by their privacy policy for which we are not responsible.

We may also disclose aggregate or de-identified/anonymized data that is not personally identifiable with third parties, including our commercial and strategic partners.

### **Overseas Transfers of Your Personal Data**

In some cases, we may need to share some of your personal information with organisations outside Mauritius when you instruct us to carry out a transaction to or from an overseas country, or when we use service providers located overseas to perform a function on our behalf. When personal data is transferred outside of Mauritius, we enter into contractual arrangements to ensure that your data is protected in line with the data privacy legislation applicable in Mauritius. The data collected may also be stored on servers which are hosted outside of Mauritius (Microsoft servers for instance).

### **Direct Marketing**

From time to time, we would like to use your name and contact information to send you either via emails, post, or social media information that we think may be of interest to you, including about CIEL Stories, events, products and services offered by our subsidiaries including offers and promotions and surveys but we can only do so with your consent.

You may opt-out from receiving marketing communications at any time, free of charge, by following the unsubscribe instructions contained in each of our marketing communications to you or by contacting us in accordance with the section “**Contact Us**” below.

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## Retention of Personal Data

Your Personal Information will be stored for as long required to fulfil our business purpose and for the period of time required by law.

Where you have chosen to lodge a job application through our website, we shall keep your CV for a period of 1 year, unless you instruct us otherwise.

To the extent required by law, we take reasonable steps to destroy, or de-identify or redact, personal data in a secure manner when we no longer need it for the purposes for which it was collected (as set out in this Privacy Policy) and retention is no longer necessary for legal or business purposes.

## Legal basis for collecting your Personal Information

We are committed to collecting and using your personal data in accordance with applicable data protection laws.

We will only collect, use and share your Personal Information where we are satisfied that we have an appropriate legal basis to do this, for instance where you have provided your consent to us using the personal data for specified purposes; our use of your personal Information is necessary to provide you with the service under our contract with you; our use of your personal data is necessary to fulfill our statutory obligations with our regulators, tax officials, law enforcement bodies, or otherwise meet our legal responsibilities; our use of your personal data is in our legitimate interest as a commercial organization.

## Our Commitment to Data Security

We have in place reasonable technical and organisational measures to prevent unauthorised or accidental access, processing, erasure, loss or use of your personal data and to keep your personal data confidential. These measures are subject to ongoing review and monitoring. To protect your personal data, we also require our third-party service providers to take reasonable precautions to keep your personal data confidential and to prevent unauthorised or accidental access, processing, erasure, loss or use of personal data, and to act at all times in compliance with applicable data protection laws.

We cannot guarantee that our website will function without fault/bugs and/or without any interruptions. We shall not be liable for damages that may result from the use of electronic means of communication, including, but not limited to, damages resulting from the failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses.

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## Children and Minors

Except where required by local laws, we do not knowingly collect personal data from minors. If you are a minor, you may only use our Site and services with the permission of your parent or guardian.

If you are in the EU, our online services are not directed at children under the age of 13. If you believe we have collected information about a child under the age of 13, please contact us so that we may take appropriate steps to delete such information. If you are at least 13 but under the age of 16, please get the consent of your parent or legal guardian before giving us any personal data about yourself.

## Third Party Sites

The Site may contain links to other websites, apps, content, services or resources on the internet which are operated by third parties. If you access other websites, apps, content, services or resources using the links provided, please be aware they may have their own privacy policy, and we do not accept any responsibility or liability for these policies or for any personal data which may be collected through these sites. Please check these policies before you submit any personal information to these sites.

## Your Rights and Contact Us

Under applicable data protection laws (including the Data Protection Act 2017 (Mauritius) and the General Data Protection Regulations), you have a number of important rights which you may exercise by writing to us at the address set out below under **Contact Us**, including: right of access to the personal data we hold about you, right of rectification, right to erasure, right to restrict data processing, right to object against profiling and your personal right to data portability if you are in the EU. You may also withdraw your consent to receiving direct marketing communications, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, we may not be able to fulfil our contractual obligations to you if you entirely withdraw your consent or ask us to delete your personal data entirely.

To protect your personal data, we shall require that you first prove your identity to us at the time the request is made, for instance by providing a copy of your government issued identification card, contact details or answering some other security questions to satisfy ourselves of your identity before we may proceed with your request(s).

Whenever reasonably possible and required, we will strive to grant these rights within one (1) month. but our response time will depend on the complexity of your requests. We will respond to your requests free of charge unless if your request involves processing or retrieving a significant volume of data, or if we consider that your request is unfounded, excessive or repetitive in which case we reserve the right to charge a fee.

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There may be circumstances where we are not able to comply with your requests, typically in relation to a request to erase your personal data or where you object to the processing of your Personal Information for a specific purpose or where you request that we restrict the use of your Personal Information where we need to keep your personal data to comply with a legal obligation or where we need to use such information to establish, exercise or defend a legal claim.

To make these requests, or if you have any questions or complaints about how we handle your personal data, or would like us to update the data we maintain about you and your preferences, please contact our data protection officer at the address set out below under **Contact Us**.

### Changes to the Privacy Policy

We may modify this Privacy Policy from time to time. Any changes to this Privacy Policy will be posted to our website so that you are always informed of the way we collect and use your personal data, and we encourage you to review this Privacy Policy whenever you access our website or otherwise interact with us to stay informed about our information practices and the ways you can help protect your privacy. Updated versions of this Privacy Policy will include the date of the revision at the end of this Privacy Policy so that you are able to check when the Privacy Policy was last amended. Any changes to this Privacy Policy will become effective upon posting of the revised Privacy Policy on the website. Use of the Site following such changes constitutes your acceptance of the revised Privacy Policy then in effect but, to the extent such changes have a material effect on your rights or obligations as regards our handling of your personal data, such changes will only apply to personal data after the changes are applied.

### Complaints

We hope that **we** can resolve any query or concern you raise about our use of your personal data.

The Data Protection Act 2017 (Mauritius) and the General Data Protection Regulation (EU) also gives you the right to lodge a complaint with a supervisory authority.

The supervisory authority in Mauritius is the Data Protection Commissioner who may be contacted at

The Data Protection Office  
5<sup>th</sup> floor, SICOM Tower  
Wall Street  
Ebène, Mauritius

However, we ask that you please try to resolve any issues with us first before referring your complaint to the supervisory authority.

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## Miscellaneous

This Privacy Policy is governed by and shall be construed in accordance with the laws of the Republic of Mauritius.

This Privacy Policy is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this Privacy Policy, the English version shall prevail.

## Contact Us

Please contact us if you have any questions about this privacy notice or the information we hold about you by writing to us at the following address:

Data Protection Officer  
CIEL Limited  
5th Floor, Ebène Skies, Rue de l'Institut  
Ebène, Mauritius

**Last Updated: 21 September 2020**

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