#### **DATA PROTECTION POLICY**

Last updated: 20 August 2025

This Data Protection Policy describes the ways in which Platinum Portfolios Global ("the Company") collects, uses, and discloses your personal information in compliance with the Data Protection Act 2017 (Mauritius) ('the Act"). By using our services, you consent to the collection and processing of your information as set forth in this Data Protection Policy, now and as amended by us.

## General

Platinum Portfolios Global is registered with the Data Protection Office of the Republic of Mauritius in terms of the Act.

We may collect information from you when you engage our services.

By using any of our services, and by providing us with any personal information, you are consenting to the use of your personal information as set out in this policy.

## Legal Basis for Data Collection and Processing

Under section 28 of the Data Protection Act 2017, processing is lawful if it is necessary for compliance with a legal obligation.

We collect personal data as required under the following acts in Mauritius, more specifically but not exclusively the Income Tax Act 1995 and the Employment Rights Act 2008, the Financial Services Act 2007, and the Financial Intelligence and Anti Money Laundering Act 2002.

### Information Collected

Your personal data comprises of information related to identification (including name, signature, nationality, place and date of birth, passport number, residential address, email address and other contact details); bank account details; professional qualifications, employment history, references and other details regarding your career history; tax status and tax identification numbers; and where necessary, information regarding your investment activities.

The data collected will be used solely for the purposes of fulfilling our legal obligations and will not be used for any other purpose without further notice.

The company may share your personal data with third parties (including bank, financial institution or other third-party lenders, IT service providers, auditors and legal professionals) under the terms of any appropriate delegation or contractual arrangement. Those authorised third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities with proper legal authority. We will only transfer this information in the limited circumstances of and for the purposes described in this policy. By using the Company, you authorize us to transfer this information.

# <u>Processing of Personal Data Principles</u>

The Company takes all reasonable steps to ensure that personal data is:

Processed lawfully, fairly and in a transparent manner. Personal data will be collected for specified, legitimate purposes and not further processed in a manner that is incompatible with those purposes. Personal data will be collected only to the extent necessary for the purpose for which it is processed. Personal data will be kept accurate and up to date. Personal data will be retained only for as long as necessary for the purposes for which it was collected. Personal data will be processed in a manner that ensures its security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage.

## Protection of Personal Data

We restrict access to personal information about you to those employees, agents or other parties who need to know that information to provide services to you or in connection with your business with or through us.

Our measures include physical, electronic and third-party security. Data is kept in secure environments with restricted physical access as well as protected by alarms. We use secure firewalls, encryption, passwords, anti-virus programs and other technologies to protect electronic data. When transferring data to third parties, we ensure they have similar protective measures in place and have up to date data protection policies.

We do not make personal information commercially available to any third party.

Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

## <u>Data Breach Policy</u>

A data breach is a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data transmitted, stored or otherwise processed.

The Company will notify the Data Protection Commissioner of a breach 'without undue delay' not later than 72 hours after the discovery of the breach. The data subject will be notified if the breach is likely to affect the privacy, rights or legitimate interest of an individual. Communication is not required when appropriate technical and organisational protection measures were already in place before the breach occurred such as encryption techniques which rendered the data unintelligible to any person not authorised to access it or the controller has taken subsequent measures to ensure that the breach is unlikely to result in a high risk to the rights and freedoms of the data subjects.

Your Rights

Under the Act we must ensure that your personal information is accurate and up to date.

Therefore, please advise us of any changes to your information so that these can be undertaken as soon as is practicable. You are also entitled to request the destruction of your

personal data, and the Company will consider your request in light of any other laws or

regulations prohibiting the Company from destroying your personal data.

<u>Data Retention</u>

The Company will store your personal information for as long as is required by the Act and

any applicable laws or regulatory requirements. Once the purpose of keeping your personal

data has lapsed, we shall destroy such information as soon as reasonably practicable.

Withdrawing your Consent

Consent cannot be withdrawn for data collected in compliance with a legal obligation to

which the controller is subject, as per s 28 (b) of the Act.

Changes to this Policy

We reserve the right to amend this policy at any time without notice, in which case, the date

of the policy will be revised.

Queries and How to Contact Us

If you have any questions about our use of your personal data, our retention procedures or

our security processes, please contact the Data Protection Officer:

Mr. Barry Steenkamp

Platinum Portfolios Global

Labourdonnais Village

Mapou 31803, Mauritius

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Email: admin@ppglobal.mu