

# Privacy Policy Summary

This website is hosted by VFS International Ltd (“VFS”), who is licensed by the Financial Services Commission, Mauritius and whose registered office address is 10th Floor, Tower 1, NeXTeracom Building, Cybercity Ebene, 72201, Mauritius.

VFS are entirely committed to safeguarding your privacy, whether online or otherwise, and the success of our business depends upon our ability to maintain the trust of our clients. Protecting the confidentiality of your personal information is of top importance to us here at VFS and we appreciate any concerns you may have about the privacy of personal information that you provide to us - whether through our website or in other ways. This is critical not only for the maintenance of our reputation but also to satisfy the legal and regulatory requirements of the Data Protection Act 2017 (DPA) and EU General Data Protection Regulation (GDPR) imposed on us to safeguard our clients and maintain orderly markets.

The EU GDPR is a new set of data privacy regulations introduced to ensure higher quality standards on the handling, processing and storage of personal data to which all organisations must adhere to. The regulation impacts all areas where EU personal data is concerned such as retention, privacy and processing rules providing new rights to individuals requiring companies such as VFS to provide information with regards to the processing of data in a clear and transparent way. VFS therefore publish this updated Privacy & Cookie Policy which sets out the principles governing our use of your Personal Data and by registering to use the services available on our website and by using the site generally, you agree to the principles set out below.

Where we refer to “personal information” or “personal data” in this Policy, we mean information which identifies you as an individual, or is capable of doing so. In the context of this Policy, the terms “personal information” and “personal data” may be used interchangeably. We may hold and use data about you in the capacity as a client (including potential client) or any other capacity in which you may visit our websites.

Use of our website is subject to our Terms of Use and any products and services supplied are subject to our Terms and Conditions. Any personal information you provide to us whether by engaging with a VFS Advisor (including an Advisor of a VFS Franchisee) or becoming a client of VFS or through using this website will be dealt with in accordance with this Privacy & Cookie Policy, the Terms of Use of this website and any signed authority form that you give to us. All VFS Franchisees are subject to the same policies and are required to confirm their compliance to same on an annual basis.

This Policy applies to information that we hold about you and aims to provide a summary of the type of information we collect and how this information is used. The policy does not cover any external third-party websites that may be accessed through the links provided on our website.

When you engage with or become a client of VFS, we will ask you to provide us with certain information including personal data. There are two types of information that we collect from our clients and visitors to our website, namely:

- Personal information which includes but is not limited to our client's name, residential address, date of birth, e-mail address, employment details, family members' details and information relating to your financial circumstances;
- Information relating to the visitors to our website.

We may supplement the information that you provide us with information that we receive from our Service Providers (including our Franchisees and preferred partners) and or other third parties such as screening companies and from the public domain. This information will enable us to provide you with a professional service and help us to keep you informed with research and other information that you may be interested in.

### **How We Acquire Your Information**

Most of the information that VFS receive comes directly from you or your Financial Adviser normally at the point when you start engaging with your Financial Adviser to use any of our services. We may also obtain personal information about you from other sources, such as:

- Fraud prevention agencies;
- Identification verification checks;
- Tracing companies, should we lose contact with you so as to keep you updated with regards your investments;
- Web search – we may search for your contact details over the web.
- Platforms – where our services are distributed through a platform, the platform may forward us a breakdown of the investments, including the name of your IFA;
- Risk and Compliance portals to conduct regulatory checks
- Third party cookies where we collect information on how visitors use our website
- We also record all calls in order to comply with our regulatory obligations.

### **The Types Of Personal Data We Might Collect And Process**

We may collect and process the following data:

- **Information about you** such as name, title, date of birth, gender, nationality, country of birth, country of residence, employment status, email address, post code, contact number. We require this information not only to help us to identify you, but also to allow us to contact you;
- **Government Identification documentation** such as Passport details, Driving Licence, National Insurance Number, Tax Identification Number and utility bills;
- **Government Records** that may be held by financial crime prevention agencies, the Electoral Register and by Utility Services providers;
- **Financial Information** such as bank account details for payments made to VFS or payments VFS make to you;
- **Income/Wealth** such as your employment status, income and source of wealth;
- **Contractual Information** such as details regarding your products and benefits that we may provide;
- **Third Party information**, where relevant such as your Executor, Trustee, Banker or any Power of Attorney etc.;

- **Online Information** such as – cookies and IP address, if you use our website

## **Why We Collect, Use, Share And Store Information About You**

We collect, use, share and store information about you to provide you with the services that you have requested from us and share information with you about the services that we offer that may be of interest to you. We will collect information directly from you or from third parties.

In some case, you are not obliged to provide any personal data to us but if you have requested information or a service or product from us, we will not be able to provide it without certain information. Before providing you with our services, we are required to obtain certain information about you so as to verify your identity and meet our obligations under the Financial Intelligence and Anti-Money laundering Act along with any other applicable legislation. Unless otherwise stated, the legal basis for our use of your personal data will be that this information is required for one or more of the legitimate interests as described in this Policy.

## **How We Use Your Personal Data**

We use any information for a number of reasons. This will depend on which category you fit into and the processing carried out by us directly or trusted third party companies that we use.

We use information in the following ways:

- to issue a Recommendation Report further to the conduct of a fact find exercise;
- to provide our services to you;
- Processing your investment application;
- Where we have an obligation to do so, such as identification verification with fraud prevention agencies to enable us to comply with our anti-money laundering obligations and for the purposes of crime and fraud prevention and to protect our business interests;
- To help protect your information and prevent unauthorised access to it;
- To comply with our obligations arising from any agreements entered into between you, the product/service provider and VFS;
- Carry out regulatory checks and meet any legal or regulatory obligations;
- Completing any enquiry or requests you may make;
- Keeping you updated with regular/quarterly reports;
- Sending you marketing emails to keep you informed about products and services you hold with us (You may opt out of receiving this information when we collect your details or at any time by contacting the Compliance Department at the address below);
- Maintaining a backup of all client data for Business Continuity purposes;
- Where we have an obligation in law and to the extent necessary for the proper operation of our systems
- To notify you of any changes to our services, and
- To help improve the services that we provide to you.

## **Who We Share Your Data With**

We will endeavour to maintain such information in accordance with our internal policies governing the use and disclosure of confidential information and will only use it for the stated purpose. We will not share this information with any third party outside VFS, other than with relevant Service Providers to enable them to assist in providing, maintaining and operating the Services, unless we have your prior permission to do so or are required to do so by law.

We **may** share your personal information with the following third parties:

- Our Service Providers and Franchisees (including their sub-contractors) and in order to provide and maintain the provision of the services.
- Appointed Auditors, Accountants, Lawyers, Consultants or other professional advisers to the extent that they require access to the information in order to advise us;
- Mauritius Revenue Authority, Financial Services Commission, Financial Intelligence Unit, Data Protection Office and other authorities as required;
- Any third party as a result of any restructure, sale or acquisition of any company within the VFS Group, provided that any recipient uses your information for the same purposes as it was originally supplied to us and/or used by us;
- Anyone to whom we may transfer our rights and/or obligations under the Agreement;
- Any person notified by you as authorised to give instructions for the purposes of managing or administering the service provided under your Agreement with us, to the extent reasonably necessary to enable us to perform the services.
- Any person that you request us to share your information with;
- Businesses that are legally part of the VFS Group of Companies, or that become part of the Group;
- Where VFS has a duty to do so to meet applicable law and regulatory requirements, or if law or regulation allows us to do so.

VFS will not lend or sell your information to third parties, but we may provide access to your personally identifiable information when legally required to do so, to cooperate with police investigations or other legal proceedings, to protect against misuse or unauthorised use of our website, to limit our legal liability and protect our rights, or to protect the rights and safety of visitors to our website. In those instances, the information is provided only for that limited purpose.

## **International Transfers - Sharing Your Information to other jurisdictions**

Subject to applicable law, VFS may share your personal information with our service providers and this may involve transferring it to other jurisdictions whose data protections laws may not be as extensive as those to which this Policy applies. Where we share information with organisations in another jurisdiction, we will ensure that we do this in accordance with the Data Protection Laws and Regulations and take appropriate measures to ensure that equivalent levels of protection is applied as far as possible. VFS may also share your information with other companies that are legally part of the VFS Group of

companies for the purposes of providing our services to you. However, only the appropriate data controllers will have access to relevant investor data.

### **How We Keep Your Personal Data**

VFS is committed to only keeping your personal information for as long as this is considered necessary, for the purposes for which it was collected, or as required by any laws that apply. This will include keeping your information for a reasonable period of time after your investment or relationship with us has ended. In the absence of specific legal, regulatory or contractual requirements, all other personal information is kept for seven (7) years after your investment /relationship with us has ended. In some cases, however, we may be required to keep information for longer, such as in cases of regulatory enquiries/inspections.

All personal data will be destroyed / deleted after the retention period.

### **Accuracy Of Your Personal Information**

We endeavour to ensure that the personal information we hold about you is accurate and up to date. Should the data we hold about you be inaccurate or outdate, we will correct it upon your request.

### **Changes To The Way We Use Your Personal Data**

Should there be any change in the way that we use your personal data, we will contact you to explain the reason for this and advise you as to why we are using your data and our legal reasons for the same.

### **Confidentiality & Security**

VFS will endeavour to maintain confidential information in accordance with our internal policies governing the use and disclosure of confidential information and will only use it for the stated purpose. We take the protection of your personal data very seriously and take appropriate steps to ensure your personal data is stored in a secure environment to prevent any unauthorised access. We will not share this information with any third party outside VFS unless so required by law. For example, with authorities as the FSC or with any other regulatory authority to which we are subject or with any person empowered to require such information by or under any legal enactment.

Where VFS use external data service providers to process personal data on our behalf to enable them to assist in providing, maintaining and operating the Services required to fulfil our obligations to you, we will always ensure that we hold appropriate agreements in place to protect your data. Any data transfers between VFS and its external service providers are conducted by secure means.

## **Protecting The Privacy And Safety Of Children**

VFS understands the importance of taking extra caution and consideration to protect the privacy and safety of children using our services. Therefore, any child shall not be permitted to use our services unless verifiable consent is given by their parents. Should it come to our notice that we have collected any information of any child without verifiable consent, we will ensure that we delete such information without undue delay.

## **Marketing Communications**

If you are an account holder and/or an investor, business contact or newsletter subscriber covered by this Policy we will keep you updated with details of our (and of other companies within the VFS Group), products and services which we feel may be of interest to you. This would also include news and information about the financial markets and financial services. We will send such information by email using the contact details that you have provided to us. We will first obtain your permission if we use your personal email address or any other information required before sending any marketing information or communications. When you are using our services, you may specify your marketing and communication preferences or indicate that you do not wish to receive news or information from us. Should you consent to receiving marketing communications, you may change your preferences or opt out at a later date by contacting us, as set out below under 'Contact Us'.

Further, we shall ensure that any third-party company that assist us in marketing our products and services, or with whom we have joint marketing agreements, are under contractual obligations to protect the confidentiality of your personal information and use it only to provide the services we have requested them to perform.

## **What Are The Legal Grounds For Using Your Data**

Data Protection gives organizations such as VFS, a number of different conditions to allow it to process your Data lawfully and we will only use your personal information when one or more of these conditions has been satisfied.

## **What Are Your Rights**

Under certain circumstances, you have the following rights in relation to your personal information such as, the right to:

- access personal information about you and to obtain a copy of it;
- request rectification or completion of personal information which is inaccurate or incomplete;
- restrict the use of personal information such as processing your details for marketing purposes;
- object to the processing of your personal information;
- data portability - meaning, in certain specific circumstances, receive your personal information, which you have provided to us, in a structured, commonly used and machine-readable format and the right to transfer that information to another data controller without hindrance, or to have such personal information transferred to another data controller where technically feasible;

- request that the personal information is erased under certain circumstances;
- be informed about any use of your personal information to make automated decisions about you, and to obtain meaningful information about the logic involved, as well as the significance and the envisaged consequences of the processing;
- prevent any processing of personal data that is causing or is likely to cause unwarranted and substantial damage or distress to you or another individual; and
- make a complaint to the Data Protection Office about the way in which your personal data is being used.

Should you wish to exercise any of these rights, please contact the Compliance Department via our contact details below. Should you contact us to exercise any of the above rights, we may ask you to provide some additional information in order to verify your identity. Please note that any personal data breach shall be communicated within 72 hours of its discovery.

# Cookies

## The Use Of Cookies, Tags & Similar Technologies

When data is provided to VFS, it is used solely for the purposes for which it has been given. We may use cookies and similar technologies on our websites and in our emails. Cookies are very small text files that may be stored on your computer or mobile device when you visit a website or enable images or click on a link in an email. These technologies do many different things such as letting you navigate between web pages efficiently and remembering your preferences. In emails they help us to understand whether you have opened the email and how you have interacted with it.

### What Are Cookies?

Cookies are used on almost every website and are text files containing small amounts of information, which your computer or mobile device downloads when you visit a website. When you return to these websites – or visit other websites that use the same cookies – they recognise these cookies and therefore your browsing device. For further information on cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org)

You can disable cookies on your computer by indicating this in the ‘options’ or ‘preferences’ menus in your browser. However, it is possible that some parts of our website will not operate correctly if you disable cookies. Should you have any questions regarding disabling cookies, the above websites will advise you how to remove cookies from your browser. You can also consult with your browser’s provider.

We are required to obtain your consent before placing cookies on your device. We will ask for your consent to our use of cookies and to the terms of use of our website when you visit our website. Clicking “continue” when prompted will indicate your consent.

## How And Why We Use Cookies

At VFS we use Cookies to collect information about how our visitors use our website, such as to:

- give you the best experience when you visit our website
- facilitate our clients' use of our website
- allow us to provide a service whereby people can access and manage their account
- allow us to keep you secure when you log in to your online account
- provide online Fact Sheets, Brochures, Research, Quarterly Commentaries, Quarterly Fact Sheets, Terms of Business, User Guides Forms and Videos;
- monitor the number of visitors to our site and collectively monitor their activities (we cannot identify where you, as an individual, are located or the software or services you are using)
- understand more about the way in which people use our Website

The cookies collect information in an anonymous form, including the number of visitors to the site, what pages they have visited. which enable us to compile reports and to help us improve the website.

Cookies used by the VFS website **DO NOT**:

- allow us to identify what you, as an individual, do on our website or what your individual preference or settings are;
- contain any personally identifiable information about you or information such as passwords;
- allow us to access other information stored on your computer, Smartphone or web-enabled device to obtain information about you and your family, or read any material kept on your hard drive;
- give us information about other websites you visit and use;
- detail your activities on other websites;
- store any information about you that others could read and understand;
- store information that may compromise your security.

## What Types Of Cookies Do We Use?

We use three main types of cookies on our website:

- **Strictly necessary cookies** - these are essential to the navigation of our website and to features such as, logging in or watching videos. These cookies do not gather information about you for profiling or marketing purposes.
- **Performance cookies** - these allow us to collect anonymous data on how visitors use our website and to improve the way our website works. These cookies do not gather personally identifiable information and the information collected is anonymous and is only used to improve the performance of our website and help us make enhancements that could improve your experience when using our online services.
- **Functionality cookies** - these remember certain information from the choices you make whilst using our website and may be used to save search settings or login details. The information these cookies collect is anonymous and cannot be used to track your browsing activity on other websites.



## **Links To Sites Provided By Others**

If you follow a link from our website to another website, please be aware that the owner of the other website will have their own privacy and cookie policies for their site. We therefore recommend that you read their policies as we are not responsible or liable for what happens at their site.

## **Using Browser Settings To Manage Cookies**

Most web browsers allow you to manage cookies via the browser settings. For example, you may choose to delete existing cookies, prevent your browser from accepting new cookies, have the browser notify you when you receive a new cookie or disable cookies altogether. Please note: if you share the use of a computer or web-enabled device, accepting or rejecting the use of cookies will affect all users of that computer or web-enabled device. You can control how cookies are placed on your device and remove existing cookies by changing your web browser settings.

## **Updates To Our Privacy & Cookie Policy**

We have adopted this Privacy & Cookie Policy in preparation for compliance with Data Protection Act 2017 and EU GDPR which takes effect on May 25, 2018. Nothing has changed with regards to how we use personal data, rather, we're making it clearer how we use it.

## **We Regularly Review Our Privacy & Cookie Policy**

We may change the content found on our website at any time, without prior notice therefore you should read our Privacy and Cookie Policy each time you use this site as access to or use of this site means that you agree to the version of the Privacy and Cookie Policy in effect on each visit to our site.

## **Contact Us**

If you have any questions or concerns with regards to this Privacy & Cookie Policy, or if you aren't happy with the way we use your information, please contact us using the details below:

Compliance Department  
VFS International Ltd  
10th Floor, Tower 1, NeXTeracom Building, Cybercity Ebene, 72201, Mauritius.  
**Email:** [compliance@vfsint.com](mailto:compliance@vfsint.com)

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