



DUCRAY LENOIR WEBSITE POLICY STATEMENT

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ABSTRACT

Website Policy Statement in line with the Data Protection Act 2017

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VERSION 1.2



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DUCRAY LENOIR

Introduction

Ducray Lenoir Ltd ("we" or "us") understand the importance of protecting your personal information. This Privacy Policy ("Policy") explains how we collect, use, and disclose your personal data when you interact with us, including through our websites ("Sites"), as a customer, investor, service provider, or any other recipient of our services ("you") in line with the Data Protection Act 2017.

Collection of Your Personal Data

We collect your personal data from various sources, subject to applicable laws, including:

- a) Directly from you (e.g., email, phone, website forms).
- b) When you enter into a contract with us.
- c) When you make information public, including social media.
- d) From third parties (e.g., employers, customers, credit bureaus, law enforcement).
- e) When you purchase products or services through third parties.
- f) From your device and browser when you visit our Sites (e.g., IP address, device type).

We may also create personal data about you, such as records of your interactions with us. We will only collect and use your personal data for lawful and legitimate business purposes.

Processing of Your Personal Data

We process your personal data based on the following legal grounds:

- a) To comply with legal obligations.
- b) To fulfil a contract with you or prepare for one.
- c) For our legitimate business interests, such as providing services to you.
- d) With your prior consent (for voluntary processing).
- e) To detect or prevent crime (as permitted by law).
- f) To manage risks to our business.
- g) When the data is publicly available.
- h) For legal claims.
- i) With your explicit consent for sensitive personal data (voluntary processing).
- j) For substantial public interest with appropriate safeguards.

We may share your personal data with:

- a) Governmental authorities when required by law.
- b) Our regulators.
- c) Affiliates, officers, directors, employees, advisors, and auditors.



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- d) Professional advisors and service providers.
- e) Parties we work with to provide products or services.
- f) Any other party with your consent.

We collect most personal data during onboarding and may update records for changes. We primarily collect data directly from you. In some cases, we may collect information through:

- **Recorded Phone Calls:** We may record calls for legal and business purposes with your knowledge.
- **Password-Protected Sections:** We may collect information for verification, providing product/service information that we believe could be of interest to you, and responding to your inquiries. We may also use cookies in these sections.

Security of Data Transfers

Due to the international nature of our business, we may transfer your personal data to other countries with varying data protection laws. The transfer may be necessary for:

- a) Contract performance or pre-contractual measures at your request.
- b) Contract conclusion or performance in your interest between us and a third party.
- c) Public interest as provided by law.
- d) Establishing, exercising, or defending legal claims.
- e) Protecting your interests or others.
- f) Compelling legitimate interests that are not overridden by your interests, rights, and freedoms, with appropriate safeguards.

Protection, Processing, and Use of Personal Data

We use your personal information to enhance product/service quality, maintain contact details, and provide investment information. We implement physical, electronic, and procedural safeguards to protect your information, including firewalls, passwords, encryption, and authentication. We do not disclose your personal data except with your consent or as permitted/required by law. We may share data with affiliates for additional product/service offers or with service providers to the extent permissible by the applicable law and under strict confidentiality agreements. Certain jurisdictions may have stricter privacy requirements that restrict data disclosure.

Storage of Personal Data

We will retain your personal data only for as long as necessary for the purposes for which it was collected. However, we may be required by law to retain your data for a specific period.



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Your Rights

Under the Data Protection Act 2017, you have several rights regarding your personal data, including:

- a) Access to your personal data.
- b) Rectification of inaccurate personal data.
- c) Erasure of your personal data (if processing is not justified).
- d) Restriction of processing of your personal data.
- e) Objection to processing of your personal data (including direct marketing).
- f) Not being subject to automated decision-making based solely on automated processing.
- g) Lodging a complaint with the Data Commissioner.

For more information about your rights under data protection legislation, please visit the Data Protection Office website (<https://dataprotection.govmu.org>)

Consent and Withdrawal

Your consent to our collection, use, or processing of your personal data must be freely given, specific, informed, and unambiguous. We will process your data based on your consent according to the law.

Withdrawing consent may prevent you from accessing certain products or services. However, we may still need to process your data if required by law.

Cookies

We may use cookies to collect your personal data in accordance with our Cookie Policy.

Controllers

For this Policy, the relevant controllers are:

Controller / Processor Entity	Ducray Lenoir Ltd
Data Protection Officer	Name: Mrs Aishah Dilmohamud Email Address: ADilmohamud@kasa.mu