

# PROCESSING CUSTOMER DATA PRIVACY POLICY

To reflect the newest changes in data protection laws (GDPR) please see below Mechan's policy in regards to why we collect and what we do with your personal data.

Mechan Limited's Customer Data Privacy Policy aims to explain to our Clients the conditions of processing of their personal data when they enter into commercial relation with Mechan Limited by subscribing any product either directly or via websites or any other services proposed.

## Collection and use of personal data

When entering a relationship with a Client, Mechan may, in strict compliance with legislation, processes personal data (identity and other elements of, ID documents, contact details, professional and financial situation) related to its Client, their legal representatives and managers or other representatives.

In order to ensure compliance with its statutory and regulatory requirements, particularly in matters concerning money laundering and the financing of terrorism, Mechan may collect additional data related to its Clients, to individuals who they are associated, to recipients and intermediaries of transactions relating to them and operations which they are associated.

Information collected are communicated directly by the Client when entering into a business relationship, the subscription and use of products and services, the conclusion of management authority, communication of orders and transactions, or by third parties authorised to communicate such information (commercial information registers, other public resources available to banking and financial institutions).

Personal data collected will be processed only for determined purposes, among others:

- To manage account(s) and/or products and services purchased, under the conditions provided in the contractual documentation, as well as to manage the account holder's orders and transactions.
- To manage the banking relationship and marketing purposes, to organise commercial events, to offer new services, and to conduct statistical and private capital surveys.
- To comply with statutory and regulatory requirements, particularly in matters concerning ID controls, the regularity check of transactions and operational risk management, the prevention of conflicts of interests, the prevention of fraud, and money laundering and the financing of terrorism.

Mechan may, for the supply of services, in accordance with the applicable legal requirements, record electronic communications (telephone, instant messaging, e-mail and all other means of electronic communication) with its counterparts in order to meet the needs of ethical control, to ensure the control and the security of transactions and the service quality.

## Communication with third-parties

Mechan may disclose personal data collected with legal entities of CIM and CMI for the purpose of managing the banking relationship, managing the products and services, executing the account holder's orders and transactions, managing accounting production, notably when pooling resources and services with Mechan, CIM and CMI.

In addition, Mechan may entrust certain services with operational functions to other entities of the CIM Group, CMI or to service providers chosen for their expertise and reliability to provide targeted and limited services. In this case, Mechan takes all physical, technical and organisational measures needed to ensure the security and confidentiality of personal data.

Application of European Union data protection rules regarding the transfer of personal data outside the European Economic Area

Owing in particular to the international nature of the CIM Group and CMI, and in order to optimise quality of service, the communication of information mentioned above may involve the transfer of personal data to countries from outside the European Economic Area (particularly IT and back office services in India), whose legislation on the protection of personal data is different from that within the European Union.

In particular, a clear and demanding contractual framework determines the conditions of intervention of service providers and the security rules that apply. This contractual framework is compliant with the European Commission on standard contractual clauses for the transfer of personal data to processors established in third countries under Directive 95/46/EC. Moreover, when required, these transfers are subject to prior authorisation from the local data protection Authorities.

Furthermore, Mechan may also disclose personal data, upon request, to the official organisations and administrative or judicial authorities of a country, located within or outside the European Economic Area, particularly in the context of the fight against money laundering and terrorist financing.

## Security of processing

Mechan takes all physical, technical and organisational measures needed to ensure the security and confidentiality of personal data, particularly in view of protecting it against loss, accidental destruction, alteration, and non-authorized access.

**Rights of access, modification and objection** - any person concerned by such processing may obtain the communication of their personal information and have it amended, updated or deleted where such information is incorrect, incomplete or outdated. They may also object, on legitimate grounds, to the processing of their personal information. Such objection may, however, prohibit Mechan from providing the requested product or service.

They may also, without having to justify their decision, refuse that any information pertaining to them is used, or communicated to any third party for commercial purposes. These rights can be exercised by contacting the Company at:

Mechan Limited, Building 5 Davy Industrial Park, Sheffield, S9 4EX, United Kingdom.