

# PRIVACY NOTICE

## Introduction

Medina Advisory Limited (the “Company”, “we”, “us”, or “our”), is a private exempt limited liability company incorporated on 4 August 2023, governed by the laws applicable in Malta.

The Company is committed to protecting the privacy and security of your personal information. The following statement sets out our privacy practices and defines how we process your data as part of conducting our business.

## Who do we collect information on?

This Notice applies to the following individuals whom we collect personal information from or about:

- Those who have entered into, or are contemplating entering into, a contract for the provision of services (Individual Client); those who are connected to Individual Clients (such as family members); and those who are connected to a client who is not an Individual Client (such as owners, investors, controllers, employees, directors and officers of a corporate client or other legal or non-legal body) (together Clients);
- Third parties with whom we interact as part of providing our services to our Clients (Intermediaries);
- Those who may be party to, or connected to party to, a legal proceeding involving our Client and/or the services which we have been engaged to provide to our Clients;
- Those who are, work for or are agents of, suppliers or service providers who provide goods and services to us;
- Those who apply for or express an interest in an employment or other similar position with the Company, whether existing at the time or not;
- Those who request newsletters, marketing material or other publications from us; and
- Visitors to our website <https://medinaadvisory.com>

## What is personal information?

Personal information means any information about you from which you can be identified. This includes, but is not limited to:

- Name;
- Nationality;
- Birth date;
- Address;
- Passport information;

- Profession, job title and position;
- Tax identification number;
- “Politically Exposed Person” status, criminal convictions, etc.

## **How do we collect and use information about you?**

We collect personal information either directly from you when you engage us to provide services or through your use of our website, or indirectly from other members of the Company, our Clients, Intermediaries, providers of independent or background checks or publicly available sources.

By using our website or otherwise contacting us, obtaining services from us or by providing your personal information to us via the forms or contact options on this website you acknowledge that you have read and understood this Notice.

## **General visitors to the website**

No personal information is collected about general visitors to our website.

- However, in addition to the information collected by us in accordance with this Notice your browser supplies some basic information about your visit. The collection of this information is common practice and is used to analyse and understand how the website is being used. The following information may be logged:
  - IP address (the internet address of your computer);
  - Date and time of your visit;
  - The type of computer;
  - Browser and operating system you are using;
  - The URL's of websites that referred you to the website; and
  - The path you take through the website.

## **Personal information provided via the website**

In one area of our website, you can choose to provide personal information by completing the form which is included in the following page:

- Contact Us

## **How and why do we use personal information?**

For processing to be lawful under the General Data Protection Regulation (the “GDPR”), a lawful basis needs to be identified before processing personal data.

For each of the purposes for which we process information, we rely on one or more of the following justifications:

- To provide you with the service you have requested (processing is necessary for the performance of a contract with the data subject);

- To provide you with information, access to resources or other services that you have requested from us on behalf of your organisation (processing is necessary for the performance of a contract with the data subject);
- To send you client service-related communications (marketing) (processing is necessary for the purposes of the legitimate interests pursued by the controller);
- To deal with communications that you send to the Company and responding to your queries, requests and complaints (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, and processing is necessary for compliance with a legal obligation);
- To fulfil our legal obligations namely in respect to AML/KYC (processing is necessary for compliance with a legal obligation);
- To carry out the recruitment process (processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract);
- Promote our events and conferences via pictures and videos disclosed on our social medias (processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party);
- To manage the infrastructure and business operations of the Company and to comply with internal policies and procedures (processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party);
- To comply with any applicable rules, laws and regulations, codes of practice or guidelines or to assist in law enforcement and investigations by relevant authorities (processing is necessary for compliance with a legal obligation).

## **Transfer of personal information**

We may transfer your personal information to others where it is necessary to fulfil one or more of the purposes outlined above and this may also include sharing your information with a third party as part of an outsourcing or other data processing arrangement.

Where we share your personal information, whether internally or externally, we will ensure that the sharing of such data is kept to the minimum necessary.

## **Marketing**

We may contact you by mail, telephone, fax, video conference, email or other electronic messaging service to notify you about special events, new features or other information that may be of interest to you in accordance with your interaction with the Company.

Where required by applicable law, your prior consent will be obtained before sending you direct marketing and you may object or opt out of receiving marketing messages from the Company.

The Company does not in any way sell, lease or rent your information to third parties.

## **Retention period of personal information**

We will retain your personal information covered by this Notice for as long as required to perform the purposes for which the data was collected, depending on the legal basis on which that data was obtained and/or whether additional legal/regulatory obligations mandate that we retain the personal information.

In general terms, this will mean that personal information will be kept for the duration of our relationship, and:

- the period required by tax, company and financial services laws and regulations, especially AML/CFT regulations; and
- as long as it is necessary for individuals to be able to bring a claim against us, and for us to be able to defend ourselves against any legal claims. This will generally be the length of the relationship plus the length of any applicable statutory limitation period under applicable law.

## **Confidentiality**

We are subject to certain confidentiality and secrecy obligations, e.g. arising under data protection, other legal obligation, contract, professional secrecy, as the case may be. The personal data we process is also subject to the said obligations.

Our representatives as well as the persons acting as Data Processors are required to follow specific procedures with respect to maintaining the confidentiality of personal information.

## **Security**

We have put in place robust systems and policies and procedures to prevent and detect any incidents where your information may be subject to unauthorised access, use or disclosure.

We and our duly authorised delegates apply appropriate information security measures designed to protect data in our possession and/or our delegates' possession from unauthorised access by third parties or any form of computer corruption.

In the unlikely event that there is a security breach, we will take all necessary steps to identify the cause and mitigate the effects. Where necessary, we will also notify you of such a breach in accordance with our obligations under the applicable data protection law.

## **Notification of a personal data breach**

The Company will notify its client of any personal data breach by the Company, its processors, or any other third-parties acting on the Company's behalf without undue delay, only where the personal data breach is likely to result in a high risk to the rights and freedoms of the Client.

## **Who can I contact?**

If you have any questions in respect of this Notice, or the processing of your personal information, or you wish to exercise any of your rights referred to above please contact us by email to [contact@medinaadvisory.com](mailto:contact@medinaadvisory.com)

If you are dissatisfied with our response and you wish to make a formal complaint you can also lodge a complaint with the competent supervisory authority on data protection matters in Malta - the Office of the Information and Data Protection Commissioner (the “IDPC”) (<https://idpc.org.mt/en/Pages/Home.aspx>). We would, however, appreciate the opportunity to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

## **Changes in this Notice**

This Notice may be updated from time to time and any updates will be published on our website at <https://medinaadvisory.com>

We last updated this Notice on 14 February 2024.