
IBL Treasury Ltd

Privacy Notice



IBL Treasury Ltd ("IBL TL", "we", "us", "our", "the Company") respects your privacy, and is committed to protecting the privacy, confidentiality and security of the personal data you provide us and is also committed to being transparent on how we process your data.

As your trust is prime to the success of our business, we are committed to protect your personal data in compliance with applicable data protection laws. Please read this privacy notice carefully as it contains important information on how IBL TL, as a registered data controller, treat the personal data that you provide us including how and why we collect, store, use and share your personal data, your rights in relation to your personal data and on how to contact us and the regulatory authorities in the event you have a complaint. Except as described in this privacy notice, we will not, sell or rent to any third party any of personal data.

1. WHO ARE WE?

IBL Treasury Ltd is a private company incorporated in Mauritius. Our registered office and principal place of business is situated at IBL House, Caudan Waterfront, Port Louis.

2. WHICH PERSONAL DATA WE COLLECT?

We collect personal data of our employees, potential employees, clients, bank authorised dealers, business contacts and/or any other service provider(s). When interacting with you, we may collect the following listed personal data for the purposes of our business activities. Of note that except for certain information that is required by law, your decision to provide any personal data to us is voluntary. However, if you do not provide certain information, we may not be able to accomplish some, or all of the purpose(s) as outlined in this privacy notice:

- Your contact details such as your name and surname, adresse(s), your telephone number(s) and e-mail address(es)
- Other personal data collected about you such as identification documents; your proof of address, your signature, your photographs, bank account(s) and financial information, transaction details and history;
- Telephone calls may be recorded as well as email conversations containing personal data as exchanged with our employees;
- CV, pictures and qualifications details where you either spontaneously apply for a job at IBL TL or respond to a vacancy notice;
- Any other personal data necessary to fulfil your special requests; and
- Any other personal data that you choose to provide to us.

Also, when you choose to receive our communications updates (including newsletters) we ask that you provide us with your email address. The provision of this information is purely voluntary, and you may opt out of receiving our communications updates at any time by unsubscribing to these communications.

3. HOW AND WHY WE USE YOUR PERSONAL DATA?

We use your personal data in the course of our business activities and interaction with you and only as may be required for specific purposes:

- Performing our agreement with you, that is, providing and facilitating business/financial services you have requested and for any related purposes such as updating and enhancing our company records;
- Telephone calls recorded and retained for business transactions, monitoring and training purposes and/or to help improve our services;
- Promoting eventual business relationships;
- Assisting you with your queries or concerns;
- Assisting in the progress of an internal or police investigations regarding a suspected fraud or other offence
- Treating your applications for specific job vacancies or on a spontaneous basis;
- Performing recruitment analytics with cvs received;
- Complying with any legal or regulatory obligations imposed on us, including due diligence purposes;
- Fulfilling our legitimate commercial interests; and
- Sending you communications if you have consented to receive the same, and for any other purposes for which we have your consent.

We will not use your personal data for purposes that are incompatible with the purposes of which you have been informed, unless it is required or authorised by law, or it is in your own vital interests to do so.

4. TO WHOM DO WE DISCLOSE PERSONAL DATA?

Your personal data is kept confidential, but we may share such relevant information as and when required in pursuance of IBL TL legitimate interests and/or in compliance with a legal obligation, under the proper authority to any of the following:

- Between affiliates of ibl tl and ibl ltd ("ibl"), our holding company, as may be relevant for the purposes set out in section 3 above and to facilitate our business activities or relationship, but we shall only do so on a strictly need to know basis. We shall take the necessary steps to ensure that your personal data will be given adequate protection as required by relevant data privacy laws and ibl tl internal policies;
- With our employees in performance of their duties and for purposes of fulfilling our business activities, or treating job applications or conducting internal analysis with a view to improving our company and services;
- With our agents, advisers, accountants, auditors, lawyers, other professional advisors, contractors or third-party service providers for the purpose of assisting us to better manage, support or develop our business and comply with our legal and regulatory obligations;
- With relevant public and governmental authorities.

We will ensure that your personal data is kept safely. Only designated persons will have access to your personal data on a strictly need-to-know basis for the purposes of fulfilling our agreement or promoting our business relationship with you. In addition, third parties with whom we share your personal data will be contractually obliged to safeguard all personal data to which they have access. Some disclosures do not require your consent. This happens when we share your personal data with (i) law enforcement bodies/agencies and other statutory authorities, if required by law and (ii) If required or authorized by law or if we suspect any unlawful activities on your part.

Where we have collected your personal data on behalf of another party, the use of your personal data by that party is governed by their privacy policy for which we are not responsible.

5. OVERSEAS TRANSFERS OF YOUR PERSONAL DATA

In some cases, we may need to transfer your personal data with organisations located in countries outside our territorial limits in order to provide our services to you. We will take appropriate safeguards in order to secure the personal data being transferred. Please note that:

- Our website page is hosted in England and North Virginia, USA
- E-mails servers and e-filing system servers are transferred in Ireland and Denmark
- The Anti-Spam and anti-virus filtering are done by a service provider based in South Africa

6. DIRECT MARKETING

From time to time, we could use your name and contact information to send you either via emails, post, or social media information that we think may be of interest to you, including newsletter or services offered by IBL TL as well as surveys but we can only do so with your consent.

You can inform us at any time if you no longer want to receive our communication by contacting us in accordance with the section "Contact Us" below (section 18 of this notice).

7. HOW LONG DO WE KEEP YOUR INFORMATION?

Your personal data will be stored for as long as required to fulfil our business purposes and for the period of time required by law, which should be a minimum of 7 years after the last transaction date. To the extent required by law, we will take reasonable steps to destroy or anonymise personal data in a secure manner when we no longer need it for the purposes for which it was collected (as set out in section 3 of this notice) and retention is no longer necessary for legal or business purposes.

8. PROCESSING OF PERSONAL DATA MUST BE JUSTIFIED

We will only process your personal data where we are satisfied that we have an appropriate legal basis to do so, such as (i) for the performance of a contract between us; (ii) where you have provided us with your express consent to process your personal data for a specific purpose; (iii) our use of your personal data is necessary to fulfill our statutory obligations with relevant authorities (regulators, tax officials, law enforcement bodies) or otherwise meet our legal responsibilities; (iv) our use of your personal data is in our legitimate interest as a financial institution.

9. SECURITY OF PERSONAL DATA

IBL TL has in place reasonable physical, technical and organisational measures to prevent unauthorised or accidental access, processing, erasure, loss or use of your personal data and to keep your personal data confidential. These measures are subject to ongoing review and monitoring. To protect your personal data, we also require our staff and third-party service providers to take reasonable precautions to keep your personal data confidential and to prevent unauthorised or accidental access, processing, erasure, loss or use of personal data, and to act at all times in compliance with applicable data protection laws. We cannot guarantee that our website will function without disruptions. We shall not be liable for damages that may result from the use of electronic means of communication, including, but not limited to, damages resulting from the failure or delay in delivery of electronic communications, interception or manipulation of electronic communications by third parties or by computer programs used for electronic communications and transmission of viruses.

10. CHILDREN AND MINORS

Except where required by local laws, we do not knowingly collect personal data from minors. If you believe we have collected information about a child under the age of 18, please contact our Data Protection Officer so that we may take appropriate steps to delete such information. If you are at least 16 but under the age of 18, please get the consent of your parent or legal guardian before giving us any personal data about yourself.

11. LINKS TO OTHER WEBSITES

Our website may contain links to other websites, apps, content, services or resources on the internet which are operated by IBLL, subsidiaries and affiliates of IBLL or third parties. If you access other websites, apps, content, services or resources using the links provided, please be aware they may have their own privacy policy, and we do not accept any responsibility or liability for these policies or for any personal data which may be collected through these sites. Please check these policies before you submit any personal information to these other websites.

12. ACCESS TO YOUR PERSONAL DATA

You have the right to request a copy of the personal data we hold about you. To do this, simply contact our Data Protection Officer and specify what data you would like. We will take all reasonable steps to confirm your identity before providing details of your personal data.

You will not have to pay a fee to access your personal data (or to exercise any of your other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

13. CORRECTION OF YOUR PERSONAL DATA

You have the right to ask us to update, correct or delete your personal data. We will take all reasonable steps to confirm your identity before making changes to personal data we may hold about you. We would appreciate it if you would take the necessary steps to keep your personal data accurate and up-to-date by notifying us of any changes we need to be aware of.

14. WITHDRAWAL OF CONSENT AND REQUEST FOR DELETION OR PERSONAL DATA

You may also withdraw your consent to receiving communications updates, or more generally to our processing of your personal data, at any time, and you may in certain circumstances ask us to delete your personal data. However, we may not be able to fulfil our contractual obligations to you if you entirely withdraw your consent or ask us to delete your personal data entirely. To protect your personal data, we shall require that you first prove your identity to us at the time the request is made, for instance by providing a copy of your national identification card, contact details or answering some other security questions to satisfy ourselves of your identity before we may proceed with your request(s).

Whenever reasonably possible and required, we will strive to grant these rights within 30 days, but our response time will depend on the complexity of your requests. We will generally respond to your requests free of charge unless if your request involves processing or retrieving a significant volume of data, or if we consider that your request is unfounded, excessive or repetitive in which case we reserve the right to charge a fee (as mentioned above regarding access).

There may be circumstances where we are not able to comply with your requests, typically in relation to a request to erase your personal data or where you object to the processing of your personal data for a specific purpose or where you request that we restrict the use of your personal data where we need to keep your personal data to comply with a legal obligation or where we need to use such information to establish, exercise or defend a legal claim. To make these requests, or if you have any questions or complaints about how we handle your personal data or would like us to update the data we maintain about you and your preferences, please contact our Data Protection Officer at the address set out under section 18 below.

15. COOKIES POLICY

Our page is hosted on IBL Ltd's website. Please refer to IBL's Privacy Notice <https://www.iblgroup.com/privacy-notice> for the Cookies policy.

16. AMENDMENTS TO THIS PRIVACY NOTICE

We may amend this privacy notice from time to time. Any amendment will be posted on our website so that you are always informed of the way we collect and use your personal data. Updated versions of this privacy notice will include the date of the revision at the end of this privacy notice so that you are able to check when the privacy notice was last amended. Any changes to this privacy notice will become effective upon posting of the revised privacy notice on the website. Use of our website following such changes constitutes your acceptance of the revised privacy notice then in effect but, to the extent such changes have a material effect on your rights or obligations as regards our handling of your personal data, such changes will only apply to personal data after the changes are applied.

17. MISCELLANEOUS

This privacy notice is governed by and shall be construed in accordance with the laws of the Republic of Mauritius. This privacy notice is written in the English language and may be translated into other languages. In the event of any inconsistency between the English version and the translated version of this privacy notice, the English version shall prevail.

18. HOW TO CONTACT US?

We have appointed a Data Protection Officer to oversee compliance with and questions in relation to this notice. If you have any questions about this notice, including any requests to exercise your legal rights, please contact our Data Protection Officer using the details set out below:

The Data Protection Officer
IBL Treasury Ltd
Caudan Waterfront, Port Louis, Mauritius
dpofficer@iblgroup.com
203 2000

19. RIGHT TO LODGE A COMPLAINT

Should there be any complaint relating to data protection matters, you may contact the Data Protection Officer at the above address or likewise alternatively if unsatisfied, as per section 23(2)(i) of the Data Protection Act 2017, you have the right to lodge a complaint with the Data Protection Commissioner (DPC) (The Data Protection Office, 5th floor, SICOM Tower, Wall Street Ebene, Mauritius).

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