



Privacy Policy

Date: 02 June 2025
Version: 1.1
Classification: Public

1. Introduction

This Privacy Policy ("the policy") was last updated and published on 02 June 2025.

Alunafi Ltd is the data controller for all of your personal data that is held by us. We respect your privacy and are committed to protecting your personal data.

This policy is our overarching Privacy Notice and will give information about what, how and why we collect and process the data, how we store the data, how long we keep it for and who we share it with.

For the purposes of this policy, Alunafi Ltd shall be referred to as the "Data Controller/ we/ us/ our", and Account Holders, prospective clients, employees or any person sharing their personal information with us shall be referred to as the "Data Subjects/ you/ your".

We collect and process personal data for the purpose of engaging business, regardless of the extent or the outcome of such engagement.

2. Personal Data we Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified.

We may collect and process the following data about you:

- a) Identification related data e.g. name, username or similar identifier, date of birth, gender, country identification documents (photo ID, passport, national ID card).
- b) Contact data including postal address, email address and telephone numbers.
- c) Data about your education, profession or work.
- d) Due Diligence information, including country of origin, residence, citizenship, source of funds and wealth.
- e) Financial information.
- f) Technical and usage data.
- g) Communications data including your communications preferences in receiving updates from us.

We do not collect personal information on children aged under 16, unless a parent or legal guardian has given his/her consent for this.

3. How your information may be shared

Your personal data may be shared with, but not limited to:

- a) our employees and representatives.
- b) our affiliates.
- c) our third-party business partners, service providers, agents, delegates, sub-contractors and/ or any other party which may be engaged or otherwise used by us for any purpose in connection with our remit.

We may also disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Alunafi Ltd or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Terms and Conditions or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.
- Public authorities, regulatory, judicial or criminal investigation bodies, in line with our legal obligations.

4. Details of transfers to third country and safeguards

It may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries within and/or outside of the EU/ EEA.

Any transfers made will be in full compliance with all aspects of the data protection law.

5. Marketing

Subject to your consent, we may contact you by post, email, telephone, text messages and other electronic means to inform you about latest events, updates and offers related to our operations or activities or services supplied by any associates, agents and by other carefully selected third parties. You may opt out of such marketing services at any time by writing to our office or sending such request by e-mail to: compliance@alunafi.com.

6. Retention Period for Information Collected

We will only hold information in accordance with the applicable legal requirements. We will only retain your information for as long as we need to.

7. Your Rights

You have the right to:

- a) ask for a copy of any information we hold about you.
- b) ask for any information we hold about you to be changed if it is inaccurate.
- c) request restricting our use of your information in certain circumstances (e.g. if you want us to establish the data's accuracy).
- d) withdraw consent at any time, where data is processed on the basis of your consent.
- e) object to the processing of your personal data in certain circumstances (e.g. for direct marketing).
- f) object to being subject of automated decision making.
- g) ask us to delete any information we hold about you, although this is not an absolute right and we may need to continue to hold your information – we will tell you why if this is the case.
- h) ask us, in appropriate circumstances, to transfer your personal information to another organisation indicated by you.

You can exercise any of your rights by contacting our data protection officer at compliance@alunafi.com. Once we receive your request, members of our data protection team will endeavour to get back to you as soon as possible to confirm receipt.

If you are unhappy about how we handle your personal data you can complain to the Office of the Information and Data Protection Commissioner (IDPC). Further information about the services offered by IDPC and the conditions for using such services can be found at idpc.org.mt.

8. Changes to our privacy policy

We keep our Privacy Policy under regular review, and we will make new versions available on our website.

9. Document Information

This Policy shall be reviewed at least annually and revised as necessary and appropriate.