CUSTOMER PRIVACY NOTICE

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1. Introduction

1.1 We, at BDO Associates (hereinafter referred to as "**BDO Seychelles**", "**we**", "**us**", or "**our**"), are committed to safeguarding the privacy of our customers, their employees and their representatives.

1.2 As a result, we would like to inform you regarding the way we would use your personal data, as is required by the European Union General Data Protection Regulation (hereinafter referred to as the "**GDPR**"). We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data.

1.3 Our Customer Privacy Notice sets out the types of personal data we collect, how we collect and process that data, who we may share this information with and the rights you have in this respect.

1.4 This notice applies where we are acting as a data controller with respect to the personal data of our customers and their representatives. As a data controller, we determine the purposes and means of the processing of that personal data.

2. Who we are?

2.1 **BDO Seychelles** is a member firm of **BDO Global** and is the leading Accountancy firm in Seychelles providing services across four main service lines, Audit & Assurance, Tax, Accounting and Advisory.

2.2 **BDO Seychelles** is registered in Seychelles under the registration number B848295.

2.3 Our principal place of business is at P.O. Box 18, The Creole Spirit, Quincy Street, Mahe Victoria, Seychelles.

3. Personal data we may collect about you

3.1 Personal data is any data from which you can be identified and which relates to you and includes *(but is not limited to)* name, address, email address, date of birth, identification numbers, special categories of personal data and bank details.

3.2 The type of data we collect will depend on the purpose for which it is collected and used. We will only collect data that we need for that purpose.

3.3 We may collect your personal data in the following ways:

(a) When you give it to us **directly** for e.g., you use any of our services, you correspond with us and provide us with your information via emails or phone calls, or when you visit our premises.

(b) When we obtain it **indirectly** from:

(i) our Associates (i.e. information relating to your contact and individual details).

(ii) World check reports (i.e. information relating to your contact details, financial information, anti-fraud details).

3.4 The types of personal data that are collected and processed may include:

Categories of Personal Data	Details
Contact details	First name, surname, home/ business address, email address, office phone number, cell phone number
Individual details	Sex (male/female), nationality, date of birth,
Employment details	Register of Directors and Shareholders, payslips, contracts of employment
Identification details	Identification numbers issued by government bodies or agencies such as your passport number and identity card number
Financial information	Financial history, transactional information on your accounts/dealings, bank details, payroll details including income and retirement benefits, and sale deeds and loan agreements for our auditing services
Physical security information	In case you visit our office premises: Information recorded in our visitors' logbook (reason for visit, organisation name, date and time of visit), CCTV footage
Credit risk and anti-fraud details	Information which we need to collect to assess the risk in providing a service. This may include data relating to criminal convictions, utility bills, political affiliations (PEPs) and information received from various anti-fraud databases such as World Check.
Special categories of personal data	Certain categories of personal data which have additional protection under the **GDPR**, namely body temperature checks for compliance with COVID-19 procedures (in case you visit our office premises).
Other	Information about requests, queries and complaints

3.5 Depending on our collaboration, other types of personal data may be collected. These will only be processed in accordance with this notice.

4. How do we use your personal data?

4.1 **BDO Seychelles** will only use your personal data for the purposes for which it was collected or agreed with you. We will not use your personal data for any automated individual decision making which will have a significant impact on you.

4.2 We have set out below the legal basis of processing for each purpose. Note that we may process your personal data for more than one lawful ground depending on the

specific purpose for which we are using your personal data.

Purpose of processing	Legal basis
For offering, supplying relevant services to you	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract
For customer due diligence	For compliance with a legal or regulatory obligation to which we are subject to, under for instance the Anti-Money Laundering and Combating the Financing of Terrorism Act 2020 and the FIU Guideline on AML/CFT Procedures for Reporting Entities in Seychelles.
For billing and invoicing purposes	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract
For record-keeping	For compliance with a legal obligation to which we are subject to, such as internal/external audit and retention periods
For the purposes of managing our relationships and communicating with customers	Performance of any contractual obligations towards you. Legitimate interests, namely for the proper management of our customer relationships.
For identity verification when you exercise your data subject's rights	For compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who makes a subject rights request. Legitimate interests.
For security purposes (recordings captured by our CCTV Footage)	Legitimate interests of ensuring physical security on our premises.
Information we collect in our Visitor's Logbook	Legitimate interests of ensuring physical security on our premises.

4.3 In addition to the above-mentioned specific purposes for which we may process your personal data, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

5. Disclosure of personal data

5.1 In general, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.

5.2 **BDO Seychelles** may share your personal data with its Affiliates *(Affiliates may include companies within the same group, our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us)*, and such third parties which assist us in fulfilling our responsibilities regarding our business relationship with you and for the purposes listed above. When we share your personal data, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your personal data. These include:

- BDO Global for our customer due diligence platform provider;
- ITSec Ltd and Galaxy Systems (PTY) Ltd for ICT Service Management and ICT Security Service; and
- Relevant banks.

5.3 We may also make certain personal data available to third party companies that provide us software and tools relevant for our business operations:

- Microsoft 365 for Microsoft Office apps, email and calendaring, business management solutions, and team communications; and
- Sophos Central for information security management solutions.

5.4 We may also be required to disclose your personal data to other third parties such as lawyers, consultants, insurers, auditors as well as public and government authorities for purposes mentioned in Section 5 or where:

- We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
- We believe it is necessary to protect our rights;
- We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
- You have given your consent.

5.5 We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We have written agreements in place with our processors to ensure that they comply with these privacy terms.

6. International transfers

6.1 We may transfer, or store, your personal data outside Seychelles as may be necessary for the purposes mentioned above.

6.2 These transfers would always be made in compliance with the **GDPR**. Data transfers do not change any of our commitments to safeguard your privacy and your personal data remains subject to existing confidentiality obligations.

6.3 If we transfer your personal data to other countries which provide a lower level of protection, we will ensure that there are appropriate safeguards in place with regard to the protection of your personal data, such as by using:

- the European Commission's approved Standard Contractual Clauses; or
- the BDO Global Privacy Policy, BDO's Binding Corporate Rules for Controllers and Processors, if we are transferring your personal data to another member firm in the BDO Global network.

6.4 If you would like further details on the transfer of your personal data outside Seychelles, please contact **BDO Seychelles** at dpo@bdo.sc.

7. Personal data security

7.1 We are legally obliged to provide adequate protection for the personal data we hold. We have put in place appropriate security measures to prevent your personal data from being subject to any accidental or unlawful destruction, loss, alteration, and any unauthorised disclosure or access.

7.2 We have also put in place procedures to deal with any suspected data security breach and will notify you and the relevant supervisory authority of a suspected breach where we are legally required to do so.

7.3 We will, on an on-going basis, continue to review our security controls and related processes to ensure that your personal data is secure.

7.4 Our security policies and procedures cover, amongst others: access control, encryption, virus and malware protection, firewall, audit trail, backup and restoration.

7.5 When we contract with third parties, we impose appropriate security, privacy and confidentiality obligations on them to ensure that personal data that we remain responsible for is kept secure.

7.6 We will ensure that anyone to whom we pass your personal data agrees to treat your data with the same level of protection as we are obliged to.

8. Your data protection rights

Under the **GDPR**, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

8.1 Your right of access to your personal data

You have the right to request a copy of the personal data we hold about you. In order to do so, simply contact us (refer to Section 10.1) and specify what data you would like to have access to. 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.

8.2 Your right to rectification of your personal data

You have the right to ask us to update or correct your personal data if you think it is inaccurate or incomplete. 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.

8.3 Your right to erasure of your personal data

You have the right to ask us to delete your personal data in certain circumstances:

- When we no longer need your personal data;
- If you initially consented to the use of your personal data, but have now withdrawn your consent;
- If you have objected to us using your personal data, and your interests outweigh ours;
- If we have collected or used your personal data unlawfully; and
- If we have a legal obligation to erase your data.

Where we collect personal data for a specific purpose, we will not keep it for longer than is necessary to fulfil that purpose, unless we have to keep it for legitimate business or legal reasons. Upon the determined expiry date, we will securely destroy your personal data. Retention periods are indicated in Annex A's Records Retention and Disposal Schedule. Data from our backup repository are also deleted depending on the next scheduled backup overwrite which may be on a weekly, monthly or yearly basis, in accordance with its configuration.

8.4 Your right to restriction of processing

You have the right to ask us to limit how we use your data. If necessary, you may also stop us from deleting your data. To exercise your right to restriction, simply contact us (refer to Section 10.1), say what data you want restricted and state your reasons. You may request us to restrict processing of your personal data in the following circumstances:

- If you have contested the accuracy of your personal data, for a period to enable us to verify the accuracy of the data;
- If you have made an objection to the use of your personal data;

- If we have processed your personal data unlawfully but you do want it deleted;
- If we no longer need your personal data but you want us to keep it in order to create, exercise or defend legal claims.

8.5 Your right to object to processing

You also have the right to object to the processing your personal data where your data is being used:

- For a task carried out in the public interest;
- For our legitimate interests;
- For scientific or historical research, or statistical purposes; or
- For direct marketing.

We shall continue the processing of your personal data despite the objection raised where we have strong compelling legitimate reasons including the establishment, exercise or defence of a legal claim.

8.6 Your right to data portability

The right to data portability allows you to ask for transfer of your personal data from one organisation to another, or to you. The right only applies if we are processing information based on your consent or performance of a contract with you, and the processing is automated. You can exercise this right with respect to information you have given us by contacting us (refer to Section 10.1). We will ensure that your data is provided in a way that is accessible and machine-readable.

8.7 Your right to withdraw consent

To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time. Withdrawal will not affect the lawfulness of processing before the withdrawal.

If you wish to exercise any of the rights set out above, please contact **BDO Seychelles** (refer to Section 10.1).

Note:

(a) If you wish to exercise any of the rights set out above, please contact **BDO Seychelles** (refer to Section 10.1).
(b) We try to respond to all requests within one month. However, it may take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

9. Changes to this privacy notice

We keep our privacy notice under regular review. We reserve the right to change our privacy notice at any time thus we encourage you to periodically review this notice to be informed of how we are using and protecting your personal data. The latest version will be available on the BDO Mauritius Website.

10. Contact details

10.1 Any question relating to this privacy notice, including any requests to exercise your legal rights, should be addressed to our Data Protection Officer by email at dpo@bdo.sc.

10.2 It is important that the personal data we hold about you is accurate and correct. Please keep us informed if your personal data changes during your relationship with us.

10.3 If you believe we have not handled your request in an appropriate manner, you have the right to complain to the relevant authority.

ANNEX A: RECORDS RETENTION AND DISPOSAL SCHEDULE

The table below sets specific retention requirements:

Purpose of processing	Retention period	Start of retention period
For offering, supplying relevant services to you	7 years	As long as you are using our services and 7 years after our collaboration has completed.
For customer due diligence	7 years	As long as you are using our services and 7 years after our collaboration has completed.
For billing and invoicing purposes	7 years	As long as you are using our services and 7 years after our collaboration has completed.
For record keeping	7 years	As long as you are using our services and 7 years after our collaboration has completed.
For the purposes of managing our relationships and communicating with customers	7 years	As long as you are using our services and 7 years after our collaboration has completed.
For identity verification when you exercise your data subject's rights	7 years	7 years after the Data Subject Access Request has been closed
For security purposes (recordings captured by our CCTV Footage)	30 days	When you visit our premise and for a period of 30 days after you left our premises.
Information we collect in our Visitor's Logbook	6 months	When you visit our premise and for a period of 6 months after you left our premises.