

WEBSITE PRIVACY NOTICE

1. Introduction

- 1.1 This notice applies to entities of BDO Mauritius, namely BDO LLP, BDO Financial Services Ltd, BDO IT Consulting Ltd and BDO Solutions Ltd (hereafter “**BDO**”, “**we**”, “**us**” or “**our**”). These entities are independent member firms of BDO International Limited (hereafter referred to as “**BDO Global**”) and provide consulting, audit, finance and accounting services to their clients.
- 1.2 We are committed to safeguarding the privacy of data subjects, including our website visitors and physical site visitors. 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 (hereafter the “**GDPR**”) and the Data Protection Act 2017 (hereafter the “**DPA**”), where applicable. We recommend you read this Privacy Notice so that you understand our approach towards the use of your personal data.
- 1.3 Our 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 As data controllers, we determine the purposes and means of the processing of that personal data. We also comply with our obligations as a data processor under the **DPA** and the **GDPR**.
- 1.5 This website is owned, operated, hosted and maintained by BDO Global.

2. Who we are

- 2.1 **BDO Global** is a UK company limited by guarantee. It is the governing entity of the BDO member firms. More information about BDO Mauritius entities are available on our website at the following link: <https://www.bdo.mu/en-gb/about>.
- 2.2 Each company in **BDO** is registered with the Data Protection Office separately in Mauritius under the following registration numbers:
 - BDO LLP: C51864
 - BDO Solutions Ltd: C14120699
 - BDO IT Consulting Ltd: C139772
 - BDO Financial Services Ltd: C26200

The principal place of business of the above **BDO** entities is at 10 Frère Felix De Valois St, Port Louis and at Vivea Business Park, Moka, Mauritius.

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.
- 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.

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 provide or offer to provide services to us, you correspond with us and provide us with your information, or you visit our premises.
- (b) When you browse and/or interact on our **website**.

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

Categories of Personal Data:	Details:
Contact details	First name, surname, email address, office phone and cell phone.
IT information	IP addresses, browser type and version, access time and length of access, page views, user activity and website usage in log files.
Physical security information	Information recorded in BDO visitors' logbook (reason for visit, organisation name, identification measures used, date and time of visit), CCTV footage.

4. Cookies

We use cookies on our website. Insofar as those cookies are not strictly necessary for the provision of our website and services, we will ask you to consent to our use of cookies when you first visit our website.

5. How we use your personal data

5.1 **BDO** 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.

5.2 We have set out below the different purposes for processing your personal data:

- For record-keeping;
- For analysing the use of our website;
- For monitoring compliance with our policies and standards;
- For ensuring the security of our website and maintaining back-ups of our databases;
- For identity verification when you exercise your data subject's rights;
- For replying to any requests, complaints, comment, or enquiries you submit to us regarding our services and notifying you about changes to our service;

- For security purposes (recordings captured by our CCTV Footage when you visit our premises).

5.3 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.

6. Legal basis of processing personal data

6.1 BDO ITC processes your personal data based on one or more of the following legal bases:

- Legal Obligations: Processing is necessary to comply with our legal obligations.
- Consent: Processing is based on your explicit consent which you can withdraw at any time.
- Legitimate interests: Processing is necessary for our legitimate interests or the legitimate interests of a third party provided that such interests are not overridden by your rights and interests.
- Contractual Necessity: Processing is necessary for the performance of a contract between you and us and/or taking steps, at your request, to enter such a contract.

7. Disclosure of personal data

7.1 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.

7.2 We may need to disclose your personal data to our parent company in the BDO Global network for the proper management of the website.

7.3 We may also make certain personal data available to third-party companies that provide us with software and tools relevant to our business operations.

7.4 We may also be required to disclose your personal data to other third parties such as lawyers, bankers, 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.

- 7.5 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.

8. International transfers

- 8.1 We may transfer, or store, your personal data outside Mauritius as may be necessary for the purposes mentioned above.
- 8.2 These transfers would always be made in compliance with the **GDPR** and/or the **DPA**. Data transfers do not change any of our commitments to safeguard your privacy and your personal data remains subject to existing confidentiality obligations.
- 8.3 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.
- 8.4 If you would like further details on the transfer of your personal data outside Mauritius, please contact our Data Protection Officer/ Privacy Champion (hereafter "**DPO**").

9. Personal data security

- 9.1 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.
- 9.2 We have also put in place procedures to deal with any suspected personal data breach and will notify you and the Data Protection Office of a suspected breach where we are legally required to do so.

10. Your data protection rights

- 10.1 Under the **GDPR** and the **DPA**, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information:
- **Right of Access:** You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information.
 - **Right to Rectification:** If you believe that the personal data, we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.

- **Right to Erasure:** In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.
- **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.
- **Right to Data Portability:** You may have the right to request a copy of your personal information in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller.
- **Right to Object:** You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to Withdraw Consent:** If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

11. Retention of your personal data

11.1 Where we collect and or process your 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. To the extent permitted or required by law, we may delete your personal data at any time. The maximum time we will keep your personal data is 7 years. However, CCTV footage will not be kept for more than 30 days, unless required for legal or investigative purposes. BDO Mauritius maintains a comprehensive Record Retention Schedule outlining our retention periods. For further details, please reach out to our Data Protection Officer (DPO).

12. 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. We will notify you of significant changes by a pop-up on the website.

13. Contact details

13.1 The primary point of contact for questions relating to this privacy notice, including any requests to exercise your legal rights, is our DPO who can be contacted by email:

- BDO LLP and BDO Financial Services Ltd at dpo@bdo.mu;
- BDO IT Consulting Ltd at dpoitc@bdo.mu;
- BDO Solutions Ltd at dposols@bdo.mu;

13.2 If you believe we have not handled your request in an appropriate manner, you have the right to complain to the Data Protection Office.

The procedure to file a complaint with the Data Protection Office is available on [https://dataprotection.govmu.org/Pages/Home%20 %20Pages/Take%20Action/To-report-your-Complaint.aspx](https://dataprotection.govmu.org/Pages/Home%20%20Pages/Take%20Action/To-report-your-Complaint.aspx)