

## **Genghis Capital Privacy Statement**

### **1. What is Personal Data?**

**“Personal Data”** consists of any information that relates to you and/or information from which you can be identified directly, indirectly. It includes information such as your name, telephone number, physical address etc.

### **2. What is the purpose and scope of this statement?**

The purpose of this statement is to inform you about how we collect, use, store, make available, disclose, update, safeguard, destroy or otherwise deal with (process) your personal information and also to explain your rights relating to the privacy of your personal information and how the law protects you.

Genghis Capital Limited is committed to keeping your information private. By your information, we mean any information about you that you provide to us. This statement relates to the privacy of your information with the Genghis Capital.

We only collect, process and share your personal data so that we can provide you with the services and/or products that you are applying for. We will obtain your consent for any other processing that is not related to this purpose.

Protecting the privacy, confidentiality and security of your personal information is very important to us as it is critical for us to maintain your trust and act in the right way to meet your needs. We have therefore implemented policies and procedures to ensure that your personal information is protected.

### **3. How do we treat your personal information?**

Personal information includes any information that lets Genghis identify you as a unique individual, such as;

- a) name, age, gender, sex, and identifying numbers;
- b) physical and email addresses and contact numbers;
- c) engagements with us including use of products or services, transactions, requests, queries, applications and complaints;
- d) other personal information including biometric details, race or ethnic origin, criminal history and behavior, medical history and health and your personal beliefs and persuasions such as religious, philosophical, trade union membership or political beliefs.

Personal information may be given to or collected by Genghis in writing as part of a written application form, electronically (email).

Processing of personal information includes any initial processing that Genghis does when we first collect your personal information. It also includes any further and ongoing processing that Genghis is allowed to carry out legitimately. The term 'processing' includes collecting, using, altering, merging, linking, organising, disseminating, storing, retrieving, disclosing, erasing, archiving, destroying or disposing of personal information.

#### **4. How do we collect your personal information?**

We will collect personal information directly from you or by telephone or through online channels such as mobile applications or electronic messaging platforms.

We also collect personal information about you from other sources where lawful and reasonable, such as reputable third parties that you deal with or that Genghis interacts with for the purposes of conducting its business. These third parties include:

- Business partners (i.e. joint-venture partners, social media and platform partners) or companies that we may acquire or that merge with us.
- Service providers (electronic communication service providers, public and private data and data verification providers including data registries, social media and marketing list providers).
- Employers, advisers, agents, associates, assignees, cessionary, successors in title, trustees, executors, and appointed third parties (including lawyers and contractors).
- Government departments, regulatory authorities, courts of law and law enforcement agencies, ombudsmen and tax authorities.

If you are a third-party service provider, we may collect personal information about you as a data subject in order to ensure that the business relationship and matters relating to the agreement between you and us can be fulfilled. You warrant that, if you provide us with any personal information about other persons, such as employees, shareholders or your directors, you are authorised to share their personal information with us for purposes set out in this statement.

Providing your personal information to us is usually voluntary. However, it may be mandatory under certain circumstances, for example when you apply for products and/or services or to comply with anti-money laundering legislation. If you fail to provide us with your personal information when requested, we may not be able to provide the products or services to you or comply with our legal obligations.

Whenever you provide us with the personal information of third parties, you must inform them that you need to disclose their personal information to us. We will process the information in accordance with this statement.

## **5. Why do we process your personal information?**

Genghis aims to provide you with personalized services to meet your needs. We may process your personal information for any of the reasons outlined herein.

Genghis will collect and process your personal information internally. However, there are times when Genghis needs to outsource these functions to third parties, either within Genghis or external, including parties.

Genghis may also need to share your personal information with external organisations, such as tax authorities or other regulatory or industry bodies, so that we can meet our due diligence or regulatory requirements. We may need to share your personal information with our business partners or counter-parties, where we are involved in corporate transactions, legal entities or assets.

Genghis will not share your personal information with third parties who do not need your personal information, or where Genghis is not legally permitted to do so. When Genghis decides to transfer your personal information to third parties, we will only provide it to organisations that have the same data privacy policies as Genghis or those who are subject to laws relating to the processing of personal information that are similar to those that apply to Genghis.

## **6. How we protect your personal information**

We have put in place appropriate measures to safeguard the personal data we collect in connection to the services we provide.

Our employees or person(s) are required to keep confidential all personal data they are handling, information technology measures are in place such as system rights and firewalls.

## **7. Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we shall take reasonable steps to remove that information from our servers.

## 8. Rights on your personal Information

You have the right to:

- a) access the personal information we hold about you and to correct and update your information; Please use this form to submit your request



Personal  
Information Rectific:

- b) object to our processing your personal information, where applicable; Please use this form to submit your request



Personal  
Information Objecti:

- c) request that we delete your personal information where appropriate; Please use this form to submit your request



Personal  
Information Deletio:

- d) be notified that your personal information is being collected by us or has been accessed or acquired by an unauthorized person
- e) object to the processing of personal information for the purposes of direct marketing;
- f) not be subject to automated decision-making processes in respect of an application for products and/or services, except under certain circumstances; Please use this form to submit your request and
- g) to request reasons or make a representation to us if your application for products and/or services is refused.
- h) If you have a complaint relating to the protection of your personal information, including the way in which it has been collected or processed by Genghis, please contact us using the contact details as listed below. If you have not had your complaint dealt with satisfactorily, you may lodge a complaint with your local privacy regulator in terms of applicable privacy laws.

## 9. Use of personal data for marketing

We may use your personal data/information to send you marketing materials related to our products in line with your contact preference. We may also use your personal data to personalize or contextualize our marketing communication to make it more relevant to you.

To opt out of receiving marketing information from us, you may unsubscribe to the email or text you receive by communicating to us through the various communication channels.

## **10. Data Retention**

All personal data is retained as long as necessary unless a longer retention period is required by law. The law requires Genghis Capital to retain your personal data for a period of seven (7) years at which point the information shall be removed from our physical data base and shall be either deleted/destroyed or archived.

## **11. Right to amend the privacy statement**

Genghis Capital reserves the right to change this statement at any time. All changes to this statement will be posted on the website. Unless otherwise stated, the current version shall supersede and replace all previous versions of this statement.

## **12. Contact Details**

Should you have any queries relating to the processing of your personal information by Genghis Capital Limited, please contact [clientrelations@genghis-capital.com](mailto:clientrelations@genghis-capital.com).

After engaging us and should your queries still not be addressed to your satisfaction, you have the right to lodge a formal complaint with the Office of the Data Protection Commissioner.

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P.O.Box 9959- 00100**

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**Email: [clientrelations@genghis-capital.com](mailto:clientrelations@genghis-capital.com)**