

CG-DPR-GUI-004	PRIVACY NOTICE
Rev 01	CLINGLOBAL SUPPLIER PRIVACY WEBSITE NOTICE

1 PURPOSE

The purpose of this Supplier Privacy Notice (the “Notice”) is to outline how Clinglobal Ltd and its Partner Companies (hereinafter referred to as “Clinglobal or Company”) collects, uses, processes, and protects the Personal Data of our suppliers, service providers, and their representatives. This Notice is in accordance with the European Union General Data Protection Regulation (GDPR), ensuring transparency and clarity regarding our approach to handling Personal Data.

2 SCOPE

This Notice applies to Clinglobal when acting as a data controller in relation to the Personal Data of suppliers, service providers, and their representatives. As a data controller, we determine the purposes and means of processing Personal Data. The Notice details the types of data we collect, the methods of collection, processing procedures, data sharing, and your rights as data subjects.

This Notice forms part of and ensures that the Data Protection and Privacy Policy is actioned through detailed measures and controls that the Company takes to protect Personal Data.

3 DEFINITIONS AND ABBREVIATIONS

3.1 Definitions

Data Controller	An entity responsible for determining the purposes and means of processing Personal Data.
Data Protection Officer (DPO)	Clinglobal has appointed a DPO who shall be responsible for GDPR compliance.
Partner Companies	Any related Company or Trust or entity to Clinglobal Ltd that chooses to adopt this Privacy Notice.
Personal Data /Information	Any data that can identify an individual, including but not limited to name, address, email address, date of birth, Special categories of Personal Data, and bank details. For the definition of “ <u>Personal Data</u> ” as used in the GDPR, please see the text of the GDPR.
Special categories of Personal Data	In relation to a data subject, it means Personal Data pertaining to his or her racial or ethnic origin, his political opinion or adherence, his religious or philosophical beliefs, his membership of a trade union, his physical or mental health or condition, his sexual orientation, practices or preferences, his genetic data or biometric data uniquely identifying him, the commission or alleged commission of an offence by him, any proceedings for an offence committed or alleged to have been committed by him, the disposal of such proceedings or the sentence of any Court in the proceedings, or such other Personal Data as the Data Protection Commissioner may determine to be sensitive Personal Data.

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3.2 Abbreviations

DPO	Data Protection Officer
EU	European Union
GDPR	General Data Protection Regulation

4 PROCEDURES/USE

4.1 The Data We Collect

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, Special Categories of Personal Data and bank details.

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:

- When the data is collected directly from you, for example, when you provide or offer to provide services to us, correspond with us and provide us with your information, or visit our premises.
- When it is publicly available, for example, when you browse and/or interact with us on our website.

The types of Personal Data that are collected and processed may include:

- Contact details: First name, surname, address, email address, office phone, and cell phone.
- Identification details: Identification numbers issued by government bodies or agencies such as your identity card number, Passport Number, BRN, VAT, certificate of incorporation, and utility bills.
- Financial information: Bank details

Depending on our collaboration, other types of Personal Data may be collected. These will only be processed in accordance with this Notice.

4.2 How We Use Your Data

Clinglobal 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.

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 supplier due-diligence check
- For identity verification when you are exercising your data subject's rights: For compliance with a legal or regulatory obligation to which we are subject to.

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- For payment purposes: For the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
- For record-keeping purposes

For managing our relationships with suppliers and for communicating with suppliers: Legitimate interest namely for:

- Proper administration of business
- Monitoring and improving our business and services and ensuring physical security on our premises.
- Dispute resolution and litigation.

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.

4.3 Disclosure of Personal Data

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.

Clinglobal may share your Personal Data with its Partner Companies, and such third-party service providers to assist us in fulfilling our responsibilities regarding our relationship with you and for the purposes listed above. When we share your data, we do so on a need-to-know basis and under clear contractual terms and instructions for the processing of your Personal Data.

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

We may also be required to disclose your Personal Data to other third parties such as lawyers, bankers, consultants, auditors, as well as public and government authorities for purposes mentioned in Section 4.2 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.

We require our Partner Companies, 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.

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4.4 International Transfers

We may transfer or store your Personal Data outside of its originating jurisdiction as necessary for the purposes outlined above. 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.

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, including using the European Commission's approved Standard Contractual Clauses.

If you would like further details on the transfer of your personal data, please contact our Data Protection Officer (hereafter "DPO") at dpo@clinglobal.com.

4.5 Data Security

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, or any unauthorized disclosure or access.

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

We will, on an ongoing basis, continue to review our security controls and related processes to ensure that your Personal Data is secure.

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

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

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.

4.6 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.

4.6.1 Your right of access to your Personal Data

You have the right to request a copy of the Personal Data we hold about you. To do this, simply contact our DPO (refer to Section 4.9) 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.

4.6.2 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 the Personal Data we may hold about you. We would appreciate it if you would take the necessary steps

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to keep your Personal Data accurate and up to date by notifying us of any changes we need to be aware of.

4.6.3 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 Section 4.8. Data from our backup repository is also deleted depending on the next scheduled backup overwrite which may be on a daily, weekly, monthly, or yearly basis in accordance with its configuration.

4.6.4 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 our DPO (refer to Section 4.9), say what data you want to be restricted and state your reasons. You may request us to restrict the 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.

4.6.5 Your right to object to processing

You also have the right to object to us 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 objections raised where we have strong compelling legitimate reasons including the establishment, exercise, or defense of a legal claim.

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4.6.6 Your right to data portability

The right to data portability allows you to ask for the transfer of your Personal Data from one organization 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 the information you have given us by contacting our DPO (refer to Section 4.9). We will ensure that your data is provided in a way that is accessible and machine-readable.

4.6.7 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.

Note:

- If you wish to exercise any of the rights set out above, please contact our DPO (refer to Section 4.9).
- We will 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.

4.7 Changes to this Privacy Notice

We may update this Notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to any laws or regulations thereof. We encourage you to periodically review this Notice to be informed of how we are using and protecting your Personal Data.

4.8 Records Retention and Disposal Schedule

We will only keep Personal Data for as long as it is necessary to fulfil the purpose outlined in this Notice and even after we have ceased our relationship with you for the period mentioned in the below table:

Purpose	Retention period	Start of Retention period
For supplier due diligence	7 Years	As long as we are using your services and 7 years after our collaboration has completed.
For identity verification when you are exercising your data subject's rights	1 Year	As from the date of request.
For managing our relationships with suppliers and for communicating with suppliers	7 Years	As long as we are using your services and 7 years after our collaboration has completed.

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4.9 Contact Details

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

- By telephone: (+230) 483 5674;
- By post, to B03/04, The Tamarin Commercial Hub, Jacaranda Avenue Tamarin MU, 90903; or
- By email, dpo@clinglobal.com.

The Personal Data we hold about you must be accurate and correct. Please keep us informed if your Personal Data changes during your relationship with us.

If you believe we have not handled your request properly, 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>

5 REFERENCES

European Union General Data Protection Regulation (GDPR)