



## **DATA PROTECTION PRIVACY POLICY**

Balboa is a licensed company manager. We are committed to protecting your privacy and maintaining the confidentiality and security of your personal data. Any personal data collected and processed by us is controlled by us and we are the data controller of any such personal data.

Please take the time to read this Policy, which contains important information about the way in which we process personal data.

Reference in this Privacy Policy to “personal data” means any information that identifies, or could reasonably be used to identify, a living individual, either on its own or together with other information.

### **What personal data do we collect from you?**

As a regulated company manager we are required to identify our clients and all Directors, Officers, and UBO’s of our clients. The personal information that you provide us with and that we process may include:

- Basic information, such as your name, your employer, your profession, title or position and your relationship to a person or entity;
- Contact information, such as your physical address, email address and phone/fax number(s);
- Financial information, such as financial net worth statements and information on source of funds;
- Any other information relating to you which you may provide to us.

### **How and why we use your personal data**

Balboa collects and processes personal data in order to comply with local laws and regulations generally in relation to Anti Money Laundering and the detection of terrorist financing. Our services include company management, accounting and administration services and the provision of Officers and Directors.

In order to provide these services, we may collect data directly from individuals in email, over the phone and in person.

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. Balboa will comply with our obligations and safeguard your rights under the Data Protection Law (Revised) at all times.

Our use of your personal data will always have a lawful basis, either because it is necessary for our performance of a contract with you, because you have consented to our use of your personal data or it is necessary for the purposes of legitimate interests pursued by Balboa, in particular, we may use your personal data for the following purposes:

- To document our files in relation to the identity of Officers, Directors, and UBO’s of clients under management and
- Document our files in relation to the identity of persons that our clients either pay money to or

receive money from.

- We will not send you any unsolicited marketing or spam.

### **Do we share your personal data?**

Your personal data may be shared with specially selected third parties to verify the information and perform background checks. In some cases, the third parties may require access to some of your personal data, including your name, ID and contact details. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the Data Protection Law and we will take appropriate safeguards to ensure its integrity and protection.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are complying with legal requirements, a court order, or a governmental authority.

### **Keeping your personal information secure**

We take appropriate measures against unauthorized or unlawful processing of your personal information and against accidental loss or destruction of, or damage to, your personal information in accordance with our procedures regarding its storage, access and destruction. Information may be stored by us or our vendors and sub-contractors either electronically or in paper files or a combination of both.

### **Retaining your personal information**

We will delete your personal information when it is no longer reasonably required by us in connection with the provision of company managerial services or if you withdraw your consent (if applicable), provided that we are not required by law or regulatory requirements to continue to hold such information.

### **Rights of data subjects**

As a data subject, you have certain rights in respect of your personal data. Any data subject wishing to exercise any rights under the Data Protection Law, including:

1. The right to be informed (this Privacy Policy informs you)
2. the right of access to your personal data
3. the right to have data corrected, updated, rectified or erased
4. rights regarding automated decisions without human involvement
5. the right to stop processing
6. the right to stop direct marketing;

should send the request in the first instance to [fionam@balboa.ky](mailto:fionam@balboa.ky)

In any case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit our processing of personal data, that data subject may be required to move the business elsewhere.

### **Contacting us**

If you have any questions about this Privacy Policy and how it affects you, please contact us by email at [fionam@balboa.ky](mailto:fionam@balboa.ky)

**If we are unable to resolve any issues you might have with this Privacy Policy, you have the right to make a complaint to the Ombudsman**

To make a complaint to the Ombudsman, you can do so by visiting the following URL on their website:

<https://ombudsman.ky/make-a-complaint>

### **Updates**

This Privacy Policy was updated in October 2019. We reserve the right to amend this Privacy Policy from time to time to reflect changing legal requirements or our processing practices. Any such changes will be posted on our website and will be effective upon posting.