

Privacy Policy & Data Protection Notice

1. Introduction

Rogers Capital Credit Ltd (the "Company" or "we" or "our") is committed to safeguarding the personal information obtained from all its customers ("your" or "you"), being completely transparent on the way how it handles Personal Data so as to provide a better protection and respect for your right of privacy, as well as provide a better overview on the security of the Personal Data collected.

The Company also outlines reasonable precautions which are taken to keep your data safe & secure. The terms mentioned herein are subject to disclaimers or other contractual terms you have entered with Rogers Capital Credit Ltd such as client privacy statements or notices, and any applicable laws & regulations. This privacy policy applies to all information collected through our and/or any related services, sales, marketing or events.

We reserve the right to make changes to this Policy as we may deem necessary from time to time or as may be required by law. Any changes made shall be immediately posted on the website. thus, our customers are advised to consult same on a regular basis. This Privacy Policy outlines our approach to Data Privacy so as to fulfil our obligations under the prevailing Data Protection laws by making our customers interests a priority.

2. Personal data we may collect about you

The type of data the Company collects shall depend on the purpose for which it is collected and used. We shall only collect data that we need for that purpose. We may collect your personal data in the following ways:

1. 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, when you visit **our digital platform**.
2. During your meetings and telephone conversations with our staff or when you visit our premises.
3. When we obtain it **indirectly** for e.g., information is shared with us by third parties (such as your credit reference agencies and law enforcement authorities). In such a case, the third party must confirm that you have consented to the disclosure of your personal data to us.

The types of personal data that are collected and processed is inclusive but not limited to:

Categories of Personal Data	Description
Contact Details	First name, surname (and any previous names), home/business address, proof of address, email address, office phone number, Residential number & cell phone number.
Individual Details	Gender (male/female), nationality, Country of birth, photographs, Marital status

Categories of Personal Data	Description
Education Details	Details of your education and qualifications;
Employment Details	Industry, role, business activities, names of current and former employers, work address, work telephone number, work email address and work-related social media profile details;
National Identification Details	Identification numbers issued by government bodies or agencies such as your passport number and identity card number and driving license number, specimen signature
Financial information	Billing address, bank account numbers, accountholder name and details, instruction records, transaction details /dealings including income/ pay details and counterparty details;
IT information	Information required to provide access to and for making use of digital Platform/Application, such as login information (username, user ID and password) Information stored on our email server, demographic information such as preferences and interests.
Voice Information	Recorded telephone conversations with the Company's staff.
Other	Information about requests, queries and complaints

3. **Cookies**

The Company shall make use cookies on the digital platforms. Insofar as those cookies are not strictly necessary for the provision of our website and services, we shall ask you to consent to our use of cookies when you visit our website.

Cookies and similar technologies we use to recognize you, remember your preferences and tailor the content we provide to you. The use of Cookies is also made to access or store information. Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services.

We invite you to read our **Cookie Policy** on the link: <https://www.rogers.mu/cookies-policy#>, if you wish to further understand our use of cookies in relation to your personal data.

4. **How does The Company make use of the information collected as mentioned above?**

The Company requires this information so as to better cater for your needs thereby providing our customers the best customer service/experience meanwhile helping the Company to improve its customer services and particularly for the following reasons:

- For Internal Records & Audit Purposes.

- To understand our customers financial needs.
- To improve the products & services currently being provided by the Company.
- To make our customers aware of special promotions, introduction of new products & services that shall be offered by The Company.
- For verification of our customers identity.
- To contact our customers for market research purposes.

The Company shall not sell, distribute or lease your personal information to third parties unless having obtained your written permission. The Company reserves the right to use your personal information to send you promotional offers/discounts about third parties which you might find interesting.

From time to time, we, or another entity with whom we have shared your personal data with your consent, may process your data on an automated basis with the aim of evaluating certain characteristics of yours (profiling) if you have provided your consent for such processing. Profiling is used to provide you with tailored information regarding the products and services offered by us. To this end, data analysis using third parties may be undertaken. This enables us to target appropriate communications and advertisements at you, including recommending products and services that we think might be suitable for you.

5. In what circumstances do we disclose your personal data?

The Company only shares information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations. The Company shall only share and disclose your information in the following situations:

- The Company may disclose your information where are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order (including in response to public authorities to meet national security or law enforcement requirements)
- The Company may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which the Company is involved.
- The Company may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
- The Company may, from time to time, disclose your personal information, with your consent, to other companies with which we have partnered and after putting in place

the necessary sharing agreements. The objective of this disclosure is to better identify your needs and provide tailor-made packages and services to you.

- The Company may disclose your personal information for any other purpose with your consent.
- As you are aware, we form part of the ENL Group, which includes ENL Limited, its subsidiaries as well as any company related to, or an associate, of ENL Limited. For the avoidance of doubt, ENL Group shall include the Rogers Group of companies. The Rogers Group of companies in turns includes Rogers and Company Limited, its subsidiaries as well as any company related to, or an associate, of Rogers and Company Limited. "Related" shall be construed in accordance with the Companies Act 2001 and "associate" shall mean those companies disclosed as associates in the audited financial statements of ENL Limited and Rogers and Company Limited as the case may be. In this context, we may, from time to time, disclose your personal information to other companies forming part of the ENL Group. The objective of this disclosure is to develop a centralized database of clients, which would help the Rogers Group and the ENL Group better identify your needs and provide tailor-made packages and services to you. Your consent shall be sought before such sharing is done. If you do not wish that your personal data, be communicated to other companies within the Rogers Group, we encourage you to notify our Data Protection Officer as soon as possible.

6. How do we keep your information secured & safe?

The Company aims to protect your personal information through a system of organizational and technical security measures. The Company has also put in place procedures to deal with any suspected data security breach and shall notify you and the Data Protection Office of a suspected breach where we are legally required to do so.

The Company also ensures that your personal information is disposed at the end of the appropriate retention period.

7. What are your Rights?

You have the following rights with regards to your data:

- **Right to access** - the right to obtain information regarding the processing of your personal data and access to the personal data which the Company holds about you. If the Company provides you with access to the information we hold about you, we shall not charge you for this, unless your request is "manifestly unfounded or excessive." Where the Company is legally permitted to do so, we may refuse your request. If we refuse your request, we shall tell you the reasons why.
- **Right to withdraw your consent** - the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may be entitled to

process your personal data if we have another legitimate reason (other than consent) for doing so.

- **Right to rectify** - the right to have your Data rectified if it is inaccurate or incomplete.
- **Right to deletion** - the right to request that the Company deletes or remove your Data from our systems in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request.
- **Right to restrict our use of your Data** - the right to “block” us from using your Data or limit the way in which we can use it.
- **Right to object** - the right to object to our use of your Data including where the Company uses it for our legitimate interests.
- **Right to lodge a complaint** - the right to lodge a complaint with the Data Protection Commissioner (details which are provided below) if you think any of your rights have been infringed by us.

Upon your request to terminate the business relationship, the Company shall delete your information from our active databases. However, some information may be retained in our files to prevent fraud, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

8. Rectification, erasure or restriction of processing

You may also, at any time, request:

- (a) to have any inaccurate personal data we hold on you corrected. This includes the right to supplement and/or update existing personal data provided to us by filling in the Data Rectification Form.
- (b) that we erase any personal data we hold on you where:
 - (i) such data is no longer necessary in relation to the purpose for which it was collected or otherwise processed;
 - (ii) you have withdrawn your consent to us holding and processing such data and there are no overriding legitimate grounds for the continued processing;
 - (iii) your personal data has been unlawfully processed.

You shall understand that this right is not absolute and that it shall not be applicable where the exceptions provided for by law apply, including where our processing of your personal data is necessary for the purpose of historical, statistical or scientific research or for compliance with a legal obligation or for the establishment, exercise or defence of a legal claim;

- (c) us to restrict processing of your personal data where:
 - (i) the accuracy of your personal data is contested by you. This restriction shall apply for such period as may be necessary to enable us to verify the accuracy of the data;
 - (ii) we no longer need the personal data for the purpose of processing;
 - (iii) you deem the processing of your personal data to be unlawful, but do not wish us to erase it; or
 - (iv) you have objected to the processing of your data. Such restriction shall apply pending verification as to our legitimate grounds to keep processing the personal data, despite your objection.

9. The possible existence of automated decision making in respect of your personal data

Automated decision making occurs when a decision which produces legal effect or significantly affects the data subject is taken by technological means without any human intervention. An example of this is where a customer record is selected by an algorithm for a direct marketing or customer communication campaign based on a set of parameters or when we make use of scorecards or a software to determine credit worthiness of customers.

We shall not process your personal data in such a way as to subject you to a decision which produces legal effects concerning you or which significantly affects, you, based solely on automated processing, except:

- (a) where the decision is necessary for entering into, or performing, a contract between us;
- (b) where the decision is authorised by a law to which we are subject and which lays down suitable measures to safeguard your rights, freedoms and legitimate interests; or
- (c) where the decision is based on your explicit consent, such as where we, or another entity within the ENL Group, aims at evaluating certain characteristics of yours (profiling) after obtaining your consent for such processing. Profiling is used to provide you with tailored information regarding the products and services offered by the ENL Group. To this end, data analysis using third parties may be undertaken. This enables the ENL Group to target appropriate communications and advertisements at you, including recommending products and services that we think might be suitable for you.

You can ask not to be subjected to a decision which is based solely on automated processing, including profiling, where that decision:

- (a) produces legal effects concerning you; or

(b) otherwise significantly affects you.

In such situations, you can request that a decision that has been taken automatically by technological means be reviewed by a human being. We shall ensure measures are in place to allow you to express your point of view, and/or contest the automated decision.

10. How we conduct direct marketing?

You may from time to time receive communication of advertising or marketing material from the Company and from companies within the ENL Group ("**Direct Marketing**") if:

- (a) you have given your consent;
- (b) you asked for a quote or other information on us;
- (c) legitimate interest is able to apply under the applicable law;
- (d) you have, at any time, purchased goods or services from us and have not opted out of receiving advertising or marketing material;
- (e) you have entered into a contractual relationship with us; or
- (f) you have provided us with your personal data when you entered a competition or registered for a promotion.

You have the right, at any time, to object to the processing of your personal data for direct marketing purposes. Where we receive such an objection from you, we shall stop processing your data for direct marketing purposes.

Unless otherwise expressly written by us when you are being asked to provide your consent, your express consent to receive marketing material or latest news from us shall entitle you to receive such marketing material or latest news from those entities within the ENL Group.

If you no longer wish to receive the latest news or marketing information from entities within the ENL Group, let us know by contacting us or click on the "Unsubscribe" link at the bottom of our email sent to you and you shall be redirected to a confirmation page that confirms you have been unsubscribed. Upon confirmation, you shall be removed from our contact list for direct marketing purposes. It may happen that you are still interested in receiving latest news or marketing information in respect of specific brands within ENL Group. If this is the case, you may also have the option to customize your choice to receive latest news and marketing information from specific (and not all) entities within the ENL Group, by contacting us through our Data Protection Officer.

11. Contact Details

If you feel that we have not processed your personal data lawfully, please do feel free to contact us through our Data Protection Officer.

You may contact our Data Protection Officer (DPO) by email at ashwin.awotur@rogerscapital.mu or by post to:

The Data Protection Officer,
Rogers Capital Credit Ltd,
Rogers House,
5, President John Kennedy Street,
Port-Louis, Mauritius

If you remain unsatisfied, you may lodge a complaint with the Data Protection Commissioner in Mauritius. Her contact details are as follows:

Address: 5th Floor, SICOM Tower, Wall Street, Ebène
Email address: dpo@govmu.org
Phone number: + (230) 460-0253
Fax: + (230) 489-7346