

## 1 Scope

As part of its support for customers worldwide, the Castor Vali Group regularly sends business-related information such as news bulletins, incident reports, newsletters and general information to its clients and contacts. We plan to continue to do so and trust that you would like to continue to receive this information. On 25 May 2018, the EU General Data Protection Regulation (GDPR) came into effect to give control of personal data back to citizens and residents, other national legislation followed suit around the world. In light of this, and our policy of corporate transparency, we are advising you about the data we collect, store and process to provide you with our regular updates and information. Castor Vali respects your privacy and will continue to protect all of your personal data that we gather, hold or process. All personal data is treated as strictly confidential and is processed in accordance with applicable data protection laws.

## 2 Data Principles

When processing personal data, Castor Vali has adopted the following principles, as laid down in the EU GDPR Regulation, as well as other national legislation including UK Data Protection Act 2018, the Kenyan Data Protection Bill 2019, the Nigerian Data Protection Regulation 2023 and other relevant legislation:

- a. Personal Data shall be processed lawfully, fairly and in a transparent way.
- b. Personal Data shall be collected for specified, explicit and legitimate purposes only.
- c. Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- d. Personal Data shall be accurate and, kept up to date. This means Castor Vali must have in place processes for identifying and addressing out-of-date, incorrect and redundant Personal Data.
- e. Personal Data shall be kept in a form that permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data is processed.

The integrity and confidentiality of Personal Data are maintained at all times through appropriate technical and organisational measures, including protection against unauthorised or unlawful Processing, and accidental loss, destruction or damage.

## 3 What do we collect?

“Personal data” is information that may be used to identify you or that can be linked to you. It is collected as a result of you voluntarily providing it to us in a number of scenarios, such as: communicating with us by email or other channels; subscribing to receive Castor Vali news bulletins and updates, alerts, or other materials; or signing up for an event. The data we collect typically includes your name, postal address, e-mail address, job title and business affiliations. If you are a member of a business network, we may also process certain data about your previous employment and, in some cases, your private phone number, postal address and e-mail address. The information we collect may also be supplemented by information gathered from other

sources such as online searches via publicly available search engines, sector-specific newsletters, social media and/or your employer's website.

#### **4 Why do we collect this information? How is it used?**

We only process your personal data where it is necessary for the purposes of legitimate interest, namely sending you information and updates that we feel is relevant to you and your business. Where necessary, we will obtain your consent. Specifically, we use such information:

- To send you newsletters, updates and other information that you have subscribed to through the Castor Vali website and/or through contact with Castor Vali personnel;
- To send you invitations to events, specific to your sector or business speciality;
- To maintain and update our list of contacts and market intelligence in enable us to tailor our service offering to your specific business needs.

Please note that Castor Vali has a strict policy of not selling, hiring out, distributing or otherwise making your personal data available to any third party. We may, however, share relevant information with our suppliers to enable them to facilitate the above.

#### **5 How do we handle your personal data once collected?**

We handle and process your personal data exclusively for the purposes outlined above, in order to maintain and enhance our business relationship and fine-tune our communications with you regarding our operations, activities, events and intelligence services. During this process, we act in accordance with all respective laws, whilst respecting the legal rights and freedoms of our business contacts.

#### **6 How do we share data internationally?**

The Castor Vali Group is a global organisation with offices in the UK and Africa, as such the data we collect may be transferred to, and stored at, a destination outside the European Economic Area ('EEA'). It may also be processed by staff operating outside the EEA who work for us or by our suppliers. Such staff maybe engaged in, among other things, the fulfilment of your service request, the processing of your payment details and the provision of support services. In line with the data protection regulations, Castor Vali has the necessary safeguards in place to ensure data is safely and appropriately transferred. Only individuals who need to process personal data for the purposes mentioned above have access to your personal data.

#### **7 How do we store your personal data?**

Your personal data is held on our management system for the specific purposes outlined above for as long as you are our business contact. So that we can check that you wish to continue that relationship, Castor Vali will give you the opportunity to unsubscribe if you no longer wish to receive our communications, updates and invitations. If you choose to unsubscribe, we will cease data processing and remove your information from our management system.

## 8 How do we protect your data?

Castor Vali uses all appropriate technical and organisational security measures to help protect your personal data against loss and to guard against access by unauthorised persons. This includes the use of secure private connections for all data transfers between offices. Our security policies and procedures are regularly reviewed and, where necessary, revised to ensure our systems are secure and protected.

## 9 Data subject rights

Data protection regulations are intended to give individuals, such as our customers, more power over how organisations like us manage their personal data. In line with these regulations, we have reviewed and enhanced our procedures to enable such data to be located and anonymised or erased, in order to respond to requests to delete, rectify, transfer, access or restrict the processing of data. This will enable us to facilitate the below enhanced rights:

- Handling Data Subject Access Requests
- Handling data portability and rectification requests
- The application of retention periods and the secure erasure of personal data

However, you should note that limiting your personal data that we hold or deleting it completely will mean that you will no longer receive Castor Vali bulletins, updates, newsletters, reports, invitations and general information. If you are dissatisfied with the way that Castor Vali processes your personal data, you have the right to report this to the Information Commissioner's Office (ICO) in the UK or other similar national body. Their contact details are at <https://ico.org.uk/>. In the unlikely event that a data breach should occur, we have implemented a procedure for rectification, reporting to the ICO and, where required, to the data subject in accordance with the regulation.

## 10 Contact us

We welcome your feedback and encourage you to advise us of any concerns you may have. If you have any questions about Castor Vali handling of your personal data, please contact us at [info@castorvali.com](mailto:info@castorvali.com).

**Policy approved by: Steve Grant**  
**CEO**  
**Castor Vali Group**

This policy is reviewed by the Castor Vali Senior Management Team in accordance with the company's Management Review Schedule.