



HIBISCUS

Data Privacy Notice Hibiscus (IOM) Limited

This Privacy Notice (the “Notice”) explains what Personal Data the Hibiscus group of companies (“Hibiscus”, “we”, “us”) will collect from you and how we will use that personal information. We are committed to being transparent with you regarding our use of your personal information and encourage you to contact us on our contact details provided below, should you have any concerns.

Your Personal Data is collected, retained and processed to and in accordance with the requirements of the General Data Protection Regulation (“DP Laws”). Depending on the services provided, Hibiscus (IOM) Limited or Hibiscus Group Limited will be the Controller for the purposes of DP Laws, this will be clear from our terms of business.

Hibiscus (IOM) Limited, is incorporated in the Isle of Man with registered office address 3rd Floor, Peveril Buildings, Peveril Square, Douglas, Isle of Man IM99 1RZ. Hibiscus (IOM) Limited is registered with the Isle of Man Information Commissioner under registration number R003413.

Hibiscus Group Limited, is incorporated in the United Kingdom with registered office address 5 Market Yard Mews, 194-204 Bermondsey Street, London, United Kingdom SE1 3TQ. Hibiscus Group Limited is registered with the Information Commissioner’s Office under registration number ZA448481.

Why we Collect Personal Data

We will obtain and process your Personal Data to:

- Comply with our regulatory and legal obligations including “know your customer” due diligence requirements and risk assessments;
- Provide currency exchange facilities;
- Assist us in developing new and improved products
- Dealing with your inquiries and requests;
- For market research, analysis and creating statistics;
- Provide you with information regarding our products and services that you request or we feel may interest you, where you have consented to be contacted for such purpose;
- Report any crime, or suspected crime, including money laundering or fraud;
- To fulfil any client obligations that may arise as part of this agreement.

Lawful Basis for Processing

For each of the abovementioned purposes Hibiscus processes your personal data on the following legal grounds:

- To carry out our obligations arising from any contracts entered into between you and us; and
- To comply with general legal and compliance obligations.

Security

Hibiscus is committed to ensuring that Data Subjects information is secure. Any data collected is stored in a secure and protected environment and is correct as it is provided.

We protect your data by:

- Offering you a secure transmission method to send us personal or company information; and
- Implementing security policies and technical measures to protect data from unauthorised or improper access, use or disclosure.

All relevant staff undergo applicable data protection training and are aware of their obligations under the GDPR.

Accuracy of Data

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information is used. Records are usually amended as soon as possible and within 7 days of receipt of any update. Should you note a discrepancy in the information that we hold on you, please contact Hibiscus.

Disclosing to Third Parties

In accordance with this Notice and data protection law, you understand and agree that we may disclose your personal information for the following purposes:

We share your Personal Data to our wider group of companies who are also required to comply with the DP Laws.

We may further disclose your personal information to third parties:

- In the event that we sell or buy any business, in which case we may disclose your personal data to the prospective seller or buyer of such business or asset; or
- If we or substantially all of our assets are acquired by a third party, in which case personal data held about our customers will be one of the transferred assets; or
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation including but not limited to, verifying information you have provided to us; or

- In order to enforce or apply the terms of this Notice or any other agreements; or
- To protect the rights, property or safety of us, our customers or others; or
- Where we have received your permission for us to do so.

International Transfers of Personal Data

It may in certain circumstance be illegal to transfer any personal data outside the EEA or approved adequate jurisdictions. When we transfer any part of your personal data outside the EEA or adequate jurisdictions we will take reasonable steps to ensure that it is treated as securely as it is within the EEA or adequate jurisdictions. These steps include but are not limited to the following levels of protection:

- Binding corporate rules;
- Model contracts; or
- Any other method deemed appropriate by the Isle of Man Data Protection legislation, or the European GDPR.

For the avoidance of doubt we only transfer your personal data within our wider group of companies who are subjected to the DP Laws. Any further international transfers will not be undertaken unless we have procured your express consent.

Data Retention and Destruction

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information is used. In determining data retention periods, Hibiscus takes into consideration local laws, contractual obligations, and the expectations of our customer. Any information destroyed is done so in a safe and secure manner. For further information on your data retention and destruction, please contact the Compliance Team using the details below.

Your Rights

You have the right to access information held about you. If you wish to exercise such right, please submit a request to us in writing, in the form of a Subject Access Request, to the Hibiscus Compliance Team:

E-mail: compliance@hibiscus.com

Any access request shall be subject to your providing acceptable proof of identification.

Your rights also include:

- The right to be informed;
- The right to rectification;
- The right to erasure (subject to local law);
- The right to restrict processing;

- The right to data portability; and
- The right to object.

Where relevant, you can also exercise your right at any time by contacting us using the aforementioned details.

Changes to this Privacy Notice

We may change this Privacy Notice from time to time by updating this page. You should check this page regularly to ensure that you are happy with any changes.

Complaints

If you are not satisfied with the outcome to any complaints, disputes or information provided by Hibiscus regarding the handling of your data, you have the right to make a complaint to the supervisory authority.

The supervisory authority for Hibiscus (IOM) Limited is the Isle of Man Information

Commissioner's Office who can be contacted via the following link:

<https://www.inforights.im/complaint-handling/how-to-make-a-complaint-to-the-information-commissioner/data-protection-complaints/>

The supervisory authority for Hibiscus Group Limited is the Information Commissioner's Office who can be contacted via the following link:

<https://ico.org.uk/make-a-complaint/>

However, please contact us in the first instance as we would appreciate the chance to deal with your concerns before you approach the supervisory authority.