

Website Privacy Notice



At ZEDRA, we take the protection of your personal data seriously and maintaining the integrity and confidentiality of your personal data is very important to us.

This Website Privacy Notice confirms how the ZEDRA Group of companies (the “ZEDRA Group” or each a “ZEDRA Company”) who are subject to applicable data protection laws collect, use and disclose personal data when providing services (the “Services”), responding to enquiries, conducting marketing activities and when users interact with our website. This Website Privacy Notice also confirms your rights as a data subject.

The main body of this Website Privacy Notice is supplemented with specific information for each country in which we operate. Please see the relevant jurisdiction –specific provisions included in the Annex to this notice for more information.

ZEDRA Group’s processing of personal data is subject to various data protection laws. If this Website Privacy Notice conflicts with applicable local law in your jurisdiction, the local law supersedes this notice. If the information in the main body of this Website Privacy Notice conflicts with the relevant country-specific information, the country-specific information overrides the main body of this notice.

In this Website Privacy Notice, “you” refers to the individual whose personal data we are processing and “us”, “we” and “our” refers to the relevant ZEDRA Company processing that personal data. A list of the ZEDRA Companies can be found at www.zedra.com/locations/.

1. What personal data do we process and for what purposes?

We collect personal data in the following circumstances:

(a) When we provide Services:

- From the information and documentation that our client provides at any time and from time to time including information and documentation provided at meetings.
- When our client communicates with us or when we communicate with our client by telephone, email or other forms of electronic communication.
- From information contained within client on-boarding documents provided by or on behalf of our clients.
- From other ZEDRA Companies who may be involved in providing the Services or from whom we have received a referral.
- From our client’s agents or advisers and employees of firms and intermediaries with which our clients are associated or who introduce our client to us.
- From publicly available sources or from third parties where we need to conduct background checks about our client.

(b) When we conduct business development and marketing activities:

- When prospective clients communicate with us or when we communicate with prospective clients by telephone, email or other forms of electronic communication.
- From publicly available sources such as professional networking sites or from third parties who may refer a prospective client to us or sell us a marketing list containing your details.
- From other ZEDRA Companies who may refer you to us.
- When prospective clients fill out application forms, registration forms, or provide documentation as part of an initial enquiry.
- When you engage with us via marketing activities (e.g. social media, marketing events, advertisements and direct marketing).

(c) When you access our website:

- We also collect certain types of personal data through the use of cookies, server logs and other similar technologies. There are more details on this in our Cookies Policy [here](#).
- If you subscribe to receiving marketing materials or send us an enquiry via our website.

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We've set out the specific categories of personal data we collect, use and process and the reasons why we collect, use and process that data below:

Personal data we process	Why do we process it?
When we provide Services:	
Your name, date of birth, passport or national identity card details, tax identification number, country of birth, domicile and citizenship, gender, marital status, residential or business address, email address, telephone number and source of wealth ("Contact Details").	- To prepare preliminary information or a proposal for you regarding our Services and provide you with our Services. - To correspond with you and provide you with information on ZEDRA i.e. changes in personnel. - To deal with any complaints or feedback that you may have, and for survey purposes. - To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).
- Employment Data, job title and role, employment history, performance records, disciplinary records, certifications and training records ("Employment Data"). - Contact Details; - Information to assess whether you may represent a money laundering or terrorist financing risk, including whether you are a politically exposed person, or have had previous criminal convictions or regulatory sanctions imposed ("Compliance/KYC Data").	- To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC). - To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).
When conducting business development and marketing activities:	
- Contact Details; - Data related to marketing activities (event registration, participation, images at events, surveys, website analytics, etc.) ("Marketing Data").	For direct marketing via email and phone. If, at any time, you tell us that you do not wish to receive direct marketing then we will not send you direct marketing materials.
- Contact Details; - Images of you that are captured for promotional purposes for use by the ZEDRA Group on our website, social media channels and marketing materials including written and video testimonials ("Images and videos"). - Data related to your device such as Online identifiers (including IP address) including website interaction and cookie management ("Website Data").	To promote and market our services, enhance our brand presence, and share testimonials or success stories with potential clients and the public via our website, social media channels, and marketing materials.
When you access our website:	
Website Data	- To ensure that the content on our website is presented in the most effective manner for you and your device. - To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. - As part of our efforts to keep our website safe and secure and as part of a disaster recovery plan.

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2. Sharing your personal data

What personal data?	Who do we share it with?	Why do we share it?
When providing Services:		
• Contact Details.	• Your advisers or agents or employees of firms with which you are associated.	• To facilitate the provision of services and to communicate regarding your relationship with us.
	• Third parties who require the personal data in order to provide a service to us in connection with the provision of the Services including other ZEDRA Companies, such as consultants, agents or contractors and delegates, internet service providers and data storage providers.	• To enable third parties to provide services to us or on our behalf in connection with the provision of our Services.
	• Our advisers who provide us with advice or assistance.	• To obtain professional advice, support audits, or manage legal claims and compliance.
	• Third parties and service providers such as banks, bankers, intermediaries, insurance companies, fund managers, investment advisers and managers, property managers, tax advisers, lawyers, and any other entity which provide services to us in respect of the Services and/or in respect of which you are connected or have an interest.	• To facilitate transactions, manage investments, and provide related services.
	• Government bodies, quasi government bodies, regulators and other authorities in any jurisdiction.	• To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.
• Contact Details; • Compliance/KYC Data; • Employment Data.	• Any third party who requires personal data as a result of any assignment, transfer or novation of our rights and obligations or any merger, restructure, sale or acquisition of the ZEDRA Group or any part thereof or to any party to whom we may transfer our rights and/or obligations.	• To facilitate corporate transactions such as mergers, acquisitions, or restructurings.
	• ZEDRA Companies.	• To ensure we are able to operate on a group basis and provide services efficiently.
	• ZEDRA Companies.	• To ensure we are able to operate on a group basis and provide services efficiently.
	• Third parties who assist us in conducting background checks about you, such as checking to see if you are on sanctions lists.	• To fulfil our regulatory and legal obligations, including anti-money laundering and compliance checks.
	• Fraud prevention agencies who will use it to prevent money laundering, to verify your identity and to prevent fraud.	• To prevent money laundering, verify your identity, and prevent fraud.
	• Courts, regulatory authorities, tax authorities, ombudsmen, law enforcement agencies, credit reference agencies or similar bodies in any jurisdiction whether such requirements have the force of law or whether not such disclosure may be enforced on us or any ZEDRA Company.	• To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.
	• Professional advisers, such as accountants, lawyers or auditors.	• Where we are required to do so to comply with our legal obligations or to defend or protect our rights
	• Regulators or other authorities.	• Where we are legally required to do so including in respect of audits, disclosures and investigations.

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What personal data?	Who do we share it with?	Why do we share it?
When conducting business development and marketing activities:		
- Contact Details; - Marketing Data.	ZEDRA Companies.	To ensure we are able to operate on a group basis and provide services efficiently.
- Contact Details; - Marketing Data.	Marketing service providers, or professional advisers.	For direct marketing purposes, to identify new products or services you may be interested in, and to administer marketing campaigns.
When you access our website:		
Website Data	Website analytics providers, IT service providers, and security partners	To ensure the website functions properly, to analyse website usage, and to maintain website security.

In some jurisdictions, we are also required to have, and to inform you of, the legal basis (or “**ground**”) we rely upon for each use of your personal data listed above. “**Legal bases**” are the legal reasons for our use of your personal data – these are set out in applicable data protection laws. If a jurisdiction requires us to have a legal basis, we cannot use your personal data without one. Please see the relevant country-specific section for more information about the legal bases we rely on in the jurisdictions in which we operate.

3. Automated Decision Making

ZEDRA does not use personal data to make automated decisions.

4. International data transfers

In sharing your personal data for the reasons set out in this Website Privacy Notice, we may need to transfer it to countries outside the country in which you reside. In particular, ZEDRA’s servers are located in the UK, Jersey, Luxembourg and Switzerland, which means your personal data may be transferred to any one of these locations when being shared within the ZEDRA Group.

Any such transfers will be carried out in accordance with applicable data protection laws, and we will ensure that appropriate safeguards are in place to protect your personal data.

Where we are required by the law in the countries in which we operate to provide you with further details about international data transfers from that jurisdiction, you will find these details in the country-specific provisions included in the Annex to this notice.

5. Retention of your data

We may retain your personal data for as long as necessary to fulfil the purposes for which it was collected, or as required by applicable or regulatory requirements in order to meet our legal and regulatory obligations but we may retain your personal data for a longer period where necessary for other legal or regulatory reasons, to respond to questions or complaints, and to defend any legal claims.

6. Your rights as a data subject

You may have certain rights and choices (with certain limitations and exceptions) regarding our processing of your personal data. These rights vary depending on the ZEDRA Company with which you engage so please see the relevant country section below for more information about the rights you have over your personal data.

If you would like to exercise your data subject rights, please use the contact information below.

7. Is it necessary for me to provide personal data to receive the Services?

It is necessary for you to provide us with the personal data that we request to enable us to provide the Services or for us to consider your application or enquiry, or to take steps at your request prior to entering into a contract for our Services. Without these details, we will be unable to provide some or all of our Services to you. If you decide not to provide us with your personal data, then we may not be able to provide some or all of our Services to you.

Website Privacy Notice



You are not required by law to provide us with personal data when using our website. However, certain features or functionalities (such as contact forms or cookies for website performance) may not be available or may not function properly if you choose not to provide certain information.

8. Contact details

If you have any questions about the processing of your personal data, please contact ZEDRA's Data Protection Lead at:

ZEDRA Data Protection Lead

By email – dataprotection@zedra.com

If you are not satisfied with our processing of your personal data, or how we respond to, or deal with, your data protection enquiry, you can make a complaint to the local regulator. See the country-specific section for these details.

9. Review

We may amend this Website Privacy Notice from time to time to reflect any changes in the way that we process personal data. The current Website Privacy Notice will always be available on our website.

Dated: 1st June 2026

Annex: Country-Specific Sections



Additional information for individuals whose personal data is subject to the data protection laws of the European Union (EU), United Kingdom (UK), Jersey, Guernsey, Cayman Islands, British Virgin Islands, Isle of Man, Monaco, Curaçao and The Bahamas.

1. Legal grounds for processing your personal data

In addition to the information provided above regarding the types of personal data we process and the reasons for processing, data protection laws in the EU, UK, Jersey, Guernsey, Cayman Islands, British Virgin Islands, Isle of Man, Monaco, Curaçao and The Bahamas require us to specify the legal basis for each processing activity. The table below sets out the relevant legal bases that apply to the processing of your personal data in these jurisdictions, in line with applicable data protection laws:

Personal data we process	Why do we process it?	What's our lawful basis?
When providing Services:		
Contact Details.	- To prepare preliminary information or a proposal for you regarding our Services and provide you with our Services. - To correspond with you and provide you with information on ZEDRA i.e. changes in personnel. - To deal with any complaints or feedback that you may have, and for survey purposes.	- Performance of a contract or in order to take steps at your request prior to entering into a contract. - As necessary for our legitimate interests in managing our business and client relationships.
Employment Data.	To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).	- To manage risk, meet our legal, compliance and regulatory obligations, such as those required to comply with anti-money laundering, drug trafficking, or countering terrorist financing laws and with tax and beneficial ownership reporting requirements. - As necessary for our legitimate interest to manage our business in an efficient and proper way including monitoring corporate governance and audit. - Where we are required to do so to comply with our legal obligations or to defend or protect our rights.
- Contact Details; - Compliance/KYC Data.	To fulfil our regulatory and other legal obligations (e.g., for compliance and KYC).	- To manage risk, meet our legal, compliance and regulatory obligations, such as those required to comply with anti-money laundering, drug trafficking, or countering terrorist financing laws and with tax and beneficial ownership reporting requirements. - As necessary for our legitimate interest to manage our business in an efficient and proper way including monitoring corporate governance and audit. - Where we are required to do so to comply with our legal obligations or to defend or protect our rights. - With respect to any criminal data, where permitted or required under applicable law, where this is necessary for reasons of substantial public interest such as fulfilling regulatory requirements relating to unlawful acts and dishonesty, or where we need to do so for the purposes relating to legal claims.

Annex: Country-Specific Sections



Personal data we process	Why do we process it?	What's our lawful basis?
When conduct business development and marketing activities:		
- Contact Details; - Marketing Data.	For direct marketing via email and phone. If, at any time, you tell us that you do not wish to receive direct marketing then we will not send you direct marketing materials.	- As necessary for our legitimate interest to market our business. - Where legally required, we will obtain your prior consent.
- Contact Details; - Images and videos; - Website Data.	To promote and market our services, enhance our brand presence, and share testimonials or success stories with potential clients and the public via our website, social media channels, and marketing materials.	Your prior consent.
When you access our website:		
Website Data.	- To ensure that the content on our website is presented in the most effective manner for you and your device. - To administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. - As part of our efforts to keep our website safe and secure and as part of a disaster recovery plan.	- As necessary for our legitimate interests (to provide you with content relevant to you in the most optimum format) - Where legally required (such as where personal data is collected via cookies), we obtain your prior consent - As necessary for our legitimate interests to run and administer our website and to evaluate, develop and improve our services. - As necessary for our legitimate interests to maintain the security of our website.

Annex: Country-Specific Sections



2. Sharing your personal data

Where we share your personal data with third parties, we do so in accordance with the requirements of applicable data protection laws in EU, UK, Jersey, Guernsey, Cayman Islands, British Virgin Islands, Isle of Man, Monaco, Curaçao and The Bahamas. The table below provides further detail on the lawful bases for sharing your personal data, supplementing the information already provided above about what data is shared, with whom, and for what purposes:

What personal data?	Who do we share it with?	Why do we share it?	What's our lawful basis for sharing?
When providing Services:			
• Contact Details.	• Your advisers or agents or employees of firms with which you are associated.	• To facilitate the provision of services and to communicate regarding your relationship with us.	• As necessary for our legitimate interests in providing services and managing our business relationship or as necessary to fulfil our contractual obligations.
	• Third parties who require the personal data in order to provide a service to us in connection with the provision of the Services including other ZEDRA Companies, such as consultants, agents or contractors and delegates, internet service providers and data storage providers.	• To enable third parties to provide services to us or on our behalf in connection with the provision of our Services.	• As necessary for our legitimate interests in managing our business and providing services, or as necessary to fulfil our contractual obligations.
	• Our advisers who provide us with advice or assistance.	• To obtain professional advice, support audits, or manage legal claims and compliance.	• Where we are required to do so to comply with our legal obligations or as necessary for our legitimate interests in defending or protecting our rights.
	• Third parties and service providers such as banks, bankers, intermediaries, insurance companies, fund managers, investment advisers and managers, property managers, tax advisers, lawyers, and any other entity which provide services to us in respect of the Services and/or in respect of which you are connected or have an interest.	• To facilitate transactions, manage investments, and provide related services.	• As necessary for our legitimate interests in providing services and managing our business, or as necessary to fulfil our contractual or legal obligations.
	• Government bodies, quasi government bodies, regulators and other authorities in any jurisdiction.	• To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.	• Compliance with legal obligations.
	• Any third party who requires personal data as a result of any assignment, transfer or novation of our rights and obligations or any merger, restructure, sale or acquisition of the ZEDRA Group or any part thereof or to any party to whom we may transfer our rights and/or obligations.	• To facilitate corporate transactions such as mergers, acquisitions, or restructurings.	• As necessary for our legitimate interests in managing corporate transactions and business continuity.
	• Other ZEDRA companies.	• To ensure we are able to operate on a group basis and provide services efficiently.	• As necessary for our legitimate interests in managing our business and providing services, or as necessary to fulfil our contractual obligations.

Annex: Country-Specific Sections



What personal data?	Who do we share it with?	Why do we share it?	What's our lawful basis for sharing?
- Contact Details; - Compliance/ KYC Data; - Employment Data.	Other ZEDRA Companies	To ensure we are able to operate on a group basis and provide services efficiently.	As necessary for our legitimate interests in managing our business and providing services, or as necessary to fulfil our contractual obligations.
	Third parties who assist us in conducting background checks about you, such as checking to see if you are on sanctions lists.	To fulfil our regulatory and legal obligations, including anti-money laundering and compliance checks.	Compliance with legal obligations or as necessary for our legitimate interests in defending or protecting our rights.
	Fraud prevention agencies who will use it to prevent money laundering, to verify your identity and to prevent fraud.	To prevent money laundering, verify your identity, and prevent fraud.	Compliance with legal obligations.
	Courts, regulatory authorities, tax authorities, ombudsmen, law enforcement agencies, credit reference agencies or similar bodies in any jurisdiction whether or not such requirements have the force of law or whether not such disclosure may be enforced on us or any ZEDRA Company.	To comply with legal or regulatory obligations, respond to lawful requests, or cooperate with investigations.	Compliance with legal obligations or as necessary for our legitimate interests in defending or protecting our rights.
	Professional advisers, such as accountants, lawyers or auditors.	Where we are required to do so to comply with our legal obligations or to defend or protect our rights	Where we are required to do so to comply with our legal obligations or as necessary for our legitimate interests in defending or protecting our rights.
	Regulators or other authorities.	Where we are legally required to do so including in respect of audits, disclosures and investigations.	Where we are legally required to do so, including in respect of audits, disclosures, and investigations.
When conducting business development and marketing activities:			
- Contact Details; - Marketing Data.	ZEDRA Companies.	To ensure we are able to operate on a group basis and provide services efficiently.	As necessary for our legitimate in-terests in marketing our services and identifying prospective clients.
	Marketing service providers, or pro-fessional advisers.	For direct marketing purposes, to identify new products or services you may be interested in, and to administer mar-keting campaigns.	Your consent (where legally required) or as necessary for our legitimate interests in marketing our services and iden-tifying prospective clients.
When you access our website:			
Website Data	Website analytics providers, IT service providers, and security partners	To ensure the website functions properly, to analyse website usage, and to maintain website security.	As necessary for our legitimate interests in operating and securing our website and improving our services.

Annex: Country-Specific Sections



3. International data transfers

In the event we transfer your personal data around the ZEDRA Group, we do so on the basis of an International Data Transfer Agreement, which includes the European Commission's Standard Contractual Clauses, as set out in the Annex to Commission Implementing Decision (EU) 2021/914 of 4 June 2021 ("**EU SCCs**"); the ICO's International Data Transfer Addendum to the EU SCCs ("**UK Addendum**"); the Jersey Data Protection Authority's Jersey Addendum to the EU SCC's ("**Jersey Addendum**"); the Guernsey Office of the Data Protection Authority's Addendum to the EU SCC's ("**Guernsey Addendum**"); an Addendum to the EU SCCs varied to comply with the Cayman Islands Data Protection Act (as revised) ("**Cayman Addendum**"); an Addendum to the EU SCCs varied to comply with the British Virgin Islands Data Protection Act, 2021 ("**BVI Addendum**"); and the APDP's International Data Transfer Addendum to the EU SCCs ("**Monaco Addendum**"), in each case, as applicable and legally required.

Where we transfer your personal data to third parties, we ensure that the country to which your personal data is sent is the subject of an adequacy decision by relevant government. If this is not the case, we will use the appropriate legal instruments, which may include entering into appropriate EU SCCs and/or the UK Addendum, the Jersey Addendum, the Guernsey Addendum, the Cayman Addendum, the BVI Addendum and/or the Monaco Addendum.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, contact the Data Protection Lead using the details provided above.

4. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **access** your personal data;
- **correct** incomplete/ inaccurate data;
- **erase** the personal data we hold about you;
- **restrict** how we handle your personal data;
- ask us to **transfer your personal data** to a third party;
- **object** to how we process your personal data;
- **withdraw your consent** at any time; and
- In France, **provide instructions regarding the handling of your personal data after your death**, including whether it should be retained, deleted, or shared. These instructions can be general or specific, and you may update or revoke them at any time. Specific instructions can be submitted to the Data Protection Lead using the details provided below.

You have the right to withdraw your consent to ZEDRA's processing of your personal data at any time, where we rely on your consent as the lawful basis for processing. If you wish to withdraw your consent, please contact the Data Protection Lead using the details provided below.

In addition, please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all.

To exercise these rights, please contact the Data Protection Lead using the details provided above.

5. Complaints

If you want to make a complaint about how we have handled your personal data, we ask that you contact the Data Protection Lead in the first instance using the details provided above, who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you may also have the right to complain to the applicable regulator set out on the next page.

Annex: Country-Specific Sections



EU

Where you are in the EU, you may contact your local Supervisory Authority – a full list of Supervisory Authorities in the EU can be found [here](#).

UK

In the UK, the relevant regulator is the ICO, and you can make your complaint via the ICO's website [here](#).

Jersey

In Jersey, the relevant regulator is the Jersey Office of the Information Commissioner, and you can make your complaint via the JOIC website [here](#).

Guernsey

In Guernsey, the relevant regulator is The Office of the Data Protection Authority, and you can make your complaint via the ODPa website [here](#).

Cayman Islands

In the Cayman Islands, the relevant regulator is the Cayman Islands Ombudsman, and you can make your complaint via the Ombudsman's website [here](#).

British Virgin Islands

In BVI, the regulator named in the Data Protection Act, 2021 is the Information Commissioner, but as at the date of this Website Privacy Notice no one has been appointed to that office.

Isle of Man

In the Isle of Man, the relevant regulator is the Isle of Man ICO, and you can find out more about how to make your complaint via the Isle of Man ICO's website [here](#).

Monaco

In Monaco, the relevant regulator is the APDP, and you can make a complaint via the APDP's website [here](#).

The Bahamas

In The Bahamas, the relevant regulator is the Office of the Data Protection Commissioner, and you can make a complaint via the DPC website [here](#).

Additional information for individuals whose personal data is subject to the data protection laws of Switzerland.

1. International Transfer

ZEDRA processes and stores personal data primarily in the countries listed in Section 4 of the ZEDRA Website Privacy Notice, but potentially in any country in the world in exceptional cases – for example through sub-contracted processors of our service providers.

If a recipient is located in a country without adequate statutory data protection (as decided by the Federal Council and in accordance with Annex 1 of the Swiss Ordinance on Data Protection), we require that the recipient undertakes to comply with Swiss and EU data protection standards (for this purpose, we use the revised European Commission's standard contractual clauses, which can be accessed [here](#), including the addendum necessary for Switzerland), unless the recipient is subject to a legally accepted set of rules to ensure data protection and unless we cannot rely on a derogation. A derogation may apply for example in the event of legal proceedings abroad, but also in cases of overriding public interest or if the performance of a contract requires disclosure, if you have consented or if the data has been made generally available by you and you have not objected to the processing.

Annex: Country-Specific Sections



2. Your rights as a data subject

Under the Swiss DPA, you have certain rights in connection with our processing of your data. You may in particular request information about the processing of your personal data, request the correction of inaccurate personal data, request the erasure of personal data, object to data processing, request the surrender of certain personal data in a commonly used electronic format or its transfer to other controllers.

Please note that these rights are subject to prerequisites, exceptions or restrictions (e.g. to protect third parties or business secrets). We reserve the right to redact copies for reasons of data protection law or confidentiality or to deliver them only in excerpted form.

If you don't agree with the way we handle your rights or with our data protection practices, please let us know (see Section 8 for the necessary contact details). You can also contact the Federal Data Protection and Information Commissioner [here](#).

Additional information for individuals whose personal data is subject to the Hong Kong Personal Data (Privacy) Ordinance (Cap. 486 of the laws of Hong Kong).

1. Direct marketing

We intend to use your personal data in direct marketing and we require your consent (which includes an indication of no objection) for that purpose. In connection with this processing, please note that:

- (a) any or all of your personal data may be used for direct marketing;
- (b) any services and/or products that we or our group companies, or of other third parties may be marketed; and
- (c) we may receive money or other property in return for providing the personal data to the other persons for direct marketing purposes and, when requesting your consent, we will inform you if we will receive any money or other property in return for providing the personal data to the other persons.

If you do not wish for us to use or provide to other persons with your personal data for use in direct marketing as described above, you may exercise your opt-out right by notifying us.

2. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **access** your personal data through a data access request;
- **correct** incomplete/ inaccurate data through a data correction request; and
- **ascertain** our policies and practices in relation to personal data.

In order to enable us to process any data access or data correction request, the person making such request will have to provide information to verify their identity and their right to access or correct the personal data. We may charge a fee for processing a data access or data correction request which must not be excessive.

To exercise these rights, please contact the Data Protection Lead using the details provided above.

Annex: Country-Specific Sections



Additional information for individuals whose personal data is subject to the data protection laws of India.

1. Your rights as a data subject

Under applicable data protection laws, you have a number of rights available, namely the right to:

- **access** a summary of your personal data, processing activities being undertaken by us with respect to such personal data, and the recipients with whom we have shared your personal data, along with a description of the personal data we shared;
- **correct** incomplete/ inaccurate/ outdated data;
- **erase** the personal data we hold about you;
- **withdraw** your consent at any time, where we rely on your consent for processing;
- **nominate** an individual to exercise your rights under this notice on your behalf in the event of your death or incapacity.

Please note that some of these rights may not always apply, as there are sometimes requirements and exemptions which may mean we need to keep processing the personal data or not disclose it, or other times when the rights may not apply at all.

To exercise these rights, please contact the Data Protection Lead using the details provided above.

2. Complaints

If you want to make a complaint about how we have handled your personal data, we ask that you contact the Data Protection Lead in the first instance using the details provided above, who will investigate the matter and report back to you. If you are still not satisfied after our response or believe we are not using your personal data in line with the law, you may escalate your complaint to the competent supervisory authority i.e., Data Protection Board in the manner prescribed by law.

Additional information for individuals whose personal data is subject to the data protection laws of Singapore.

For individuals whose personal data is subject to Singapore law, the information set out in the UK/EU section of this Annex generally applies, except as modified or supplemented by the additional provisions set out below.

1. Legal grounds for processing your personal data

Under the Personal Data Protection Act 2012 of Singapore ("PDPA"), ZEDRA may collect, use, or disclose your personal data only with your consent (which may be express or deemed), or as otherwise permitted or required by law. Consent is valid only if you have been notified of the purposes for which your personal data will be collected, used, or disclosed.

The PDPA also provides for exceptions where consent is not required, including but not limited to:

- Where necessary to respond to an emergency that threatens your life, health, or safety.
- Where required or authorised by law.
- For legitimate interests (subject to a balancing test and notification requirements).
- For business improvement or asset transactions (subject to statutory conditions).
- Where the data is publicly available.

ZEDRA applies additional safeguards to sensitive data as recommended by the Personal Data Protection Commission of Singapore ("PDPC").

Annex: Country-Specific Sections



2. Sharing your personal data

ZEDRA may share your personal data with third parties in Singapore or overseas, but only where:

- The third party is acting as a data intermediary (processor) and processes your data on our behalf and for our purposes only;
- The sharing is necessary for the purposes notified to you and for which you have provided consent (or as otherwise permitted or required by law); or
- The recipient is bound by legally enforceable obligations to provide a standard of protection comparable to the PDPA, or another exception under the PDPA applies.

ZEDRA will take reasonable steps to ensure that any third-party recipient provides comparable protection for your personal data.

3. International data transfers

ZEDRA may transfer your personal data outside Singapore only if the recipient is bound by legally enforceable obligations (such as contract, binding corporate rules, or law) or specified certifications (such as Asia Pacific Economic Cooperation (APEC) Cross Border Privacy Rules (CBPR) or Privacy Recognition for Processors (PRP)) to provide a standard of protection comparable to that under the PDPA.

Other permitted transfer scenarios include:

- With your consent (after being informed of the risks).
- Where necessary for the performance of a contract with you.
- For your vital interests or national interest.
- Where the data is in transit through Singapore.
- Where the data is publicly available.

If you wish to obtain more information on how we transfer your personal data or wish to obtain a copy of the legal instruments implemented, please contact the Data Protection Lead using the details provided above.

4. Your rights as a data subject

Under the PDPA, you have the following rights:

- **Access:** You may request access to your personal data in our possession or control, and information about how your data has been used or disclosed in the past year.
- **Correction:** You may request correction of errors or omissions in your personal data.
- **Withdrawal of Consent:** You may withdraw your consent to our processing of your personal data at any time, subject to legal or contractual restrictions.
- **Direct Marketing:** You may object to the use of your personal data for direct marketing purposes.

Please note:

- There is no general right to erasure ("right to be forgotten") or data portability under the PDPA. Organisations are required to delete personal data only when it is no longer necessary for legal or business purposes, or when consent is withdrawn and there is no other basis to retain the data. Although a data portability obligation has been introduced in the PDPA, it is not yet in force. Once the relevant regulations are issued, organisations will be required, at the request of the individual, to transmit the individual's data in their possession or control to another organisation in a commonly used machine-readable format.

Annex: Country-Specific Sections



- ZEDRA may charge a reasonable fee for access requests, but not for correction requests. You will be notified of any fee in advance.
- ZEDRA is required to respond to access or correction requests as soon as reasonably possible, and generally within 30 days. If more time is needed, you will be informed of the reason and expected timeframe.
- Some rights may not always apply due to statutory exemptions or overriding legal obligations.

To exercise your rights, please contact the Data Protection Lead using the details provided above.

5. Complaints

If you wish to make a complaint about how we have handled your personal data, please contact the Data Protection Lead in the first instance, who will investigate and respond to you. If you are not satisfied with our response or believe we are not using your personal data in line with the law, you have the right to lodge a complaint with the PDPC: <https://www.pdpc.gov.sg/complaints-and-reviews>

Additional information for individuals whose personal data is subject to the data protection laws of the U.S.

1. Do Not Track

Our website does not currently take any action when it receives a Do Not Track request. Do Not Track is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For details, including how to turn on Do Not Track, visit www.donottrack.us.

2. Children

We do not knowingly collect or maintain personal data from any person under the age of 16. No parts of our website are directed to or designed to attract anyone under the age of 16.

3. Nevada Residents

Under Nevada law, ZEDRA does not sell your personal data. However, if you are a Nevada resident, you may submit a request that we not sell any personal information we have collected about you by contacting us at dataprotection@zedra.com.