



DATA PROTECTION POLICY



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Definitions

(As per Data Protection Act 2017 of the Republic of Mauritius)

“Biometric data” means any personal data relating to the physical, physiological or behavioural characteristics of an individual which allow his unique identification, including facial images or dactyloscopic data.

“Consent” means any freely given specific, informed and unambiguous indication of the wishes of a data subject, either by a statement or a clear affirmative action, by which he signifies his agreement to personal data relating to him being processed.

“Controller” means a person who or public body which, alone or jointly with others, determines the purposes and means of the processing of personal data and has decision making power with respect to the processing.

“Data subject” means an identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual

“Processing” means an operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

“Private Data” means personal information including data relating to an individual who can be identified from those data or data or other information, including an opinion forming part of a database, whether or not recorded in a material form, about an individual whose identity is apparent or can reasonably be ascertained from the data, information or opinion.

“Processor” means a person who, or public body which, processes personal data on behalf of a controller.

“Profiling” means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual, in particular to analyse or predict aspects concerning that individual’s performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

“Personal Data Breach” A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed.

“Third party” means a person or public body other than a data subject, a controller, a processor or a person who, under the direct authority of a controller or processor, who or which is authorised to process personal data.



1. The Company

DYNAMIC MARKETS is the registered trade mark of GLOBAL DYNAMIC MARKETS LIMITED.

References to the term “Company” throughout this policy relates to Global Dynamic Markets Limited.

The Company is duly incorporated under the laws of the Republic of Mauritius and bears Company registration number 179025 GBC. The Company is duly licensed by the Financial Services Commission of Mauritius and hold an Investment Dealer (Full Service Dealer excluding Underwriting) licence with licence number GB21026278. The Company operates as an Investment Dealer.

The Company’s registered office address is C/o Accuvise Administrators Ltd, 7A Mayer Street, Port Louis, Republic of Mauritius.

2. Background

The Company value your privacy and care on how your personal data is treated. As such, while collecting, processing and managing all such information, including your email addresses and contact numbers, we have processes in place to ensure that such information is kept securely on our systems and in compliance with the Data Protection Act 2017 of the Republic of Mauritius.

This commitment is driven by our compliance team that oversees the collect, storage and use of personal data in the Company.

All our employees observe the strictest confidentiality in respect of any information acquired in the course of their duties or in connection with their employment relating to the affairs or business of the Company, any member or employee of the company, the clients of the company or any person dealing with the company.

All information obtained in the execution of the duties entrusted to any employee of the Company remains of a confidential nature and is not to be divulged to anybody outside the company except in the course of its business operations and under strict control and supervision of the Data Protection Officer and the Compliance Officer.



3. Data Protection Act

Mauritius regulates data protection under the Data Protection Act 2017 (DPA 2017 or Act), proclaimed through Proclamation No. 3 of 2018 and effective on January 15, 2018. The Act repeals and replaces the Data Protection Act 2004, so as to align with the European Union General Data Protection Regulation 2016/679 (GDPR).

The DPA strengthens the control and personal autonomy of data subjects over their personal data in line with international standards, namely with the GDPR and the European Convention for Protection of Individuals with regards to automatic processing of personal data. The DPA also aims to align the Mauritius provisions for data protection with the current and challenging technological and other advancements that have occurred.

4. Data Protection Office

The Data Protection Office is a statutory body which is entrusted with a wide range of enforcement powers to ensure that the principles of data protection are observed. It promotes awareness of data protection laws, ensures compliance with those laws, investigates complaints and cooperates with supervisory authorities of other countries. It is headed by the Data Protection Commissioner, who is a barrister of not less than 5 years' standing.

The Company is registered with the Data Protection Office of Mauritius as controller till 31st July 2026, date on which the Company shall renew its registration for another period of 3 years, ongoing.

5. Collection of Personal data

The Company is regulated and licensed by the Financial Services Commission of Mauritius as an investment dealer company. As part of our licensing conditions and in order to fulfil our legal and regulatory requirements in Mauritius, we need to undertake "Customer Due Diligence" on our clients to whom the Company provides/shall provide services.

We need your personal data in order to provide you with a full range of investment dealer services and ensure that our CDD are properly carried out based on your personal data. This includes verification of your identity by collecting your passport / identity card, your personal home address, biometric physical characteristics such as facial verification, your source of wealth/fund and any other verification by which Global Dynamic Markets Limited can ascertain your personal identity.

The following personal data is processed by Global Dynamic Markets Limited:



Identity Information: Name, surname, date and place of birth, type and number of identity document, nationality, identity document image/photocopy, maiden name, professional registration number, specimen signature, and similar information.

Visual Data: Camera recordings, photographs used for identity verification, identity document or passport images and similar information.

Special Categories of Personal Data: identity verification process pursuant to the Communique, face biometrics verification, liveness checks, records obtained during verification of information/security features on your identity document, your facial image, information on the front and back of your identity document, biometric photograph.

Contact Information: Telephone number, e-mail address and address.

Financial Information: Bank account number or IBAN details, credit and debit card numbers, assets in your portfolio, monthly income information, income certificate or any other information to ascertain your source of wealth/fund and its origin.

Education and Professional Experience: Institution of employment, duration of employment, sector, title, education level, companies in which you are a founder/partner, your position and shareholding percentage in these companies.

Risk Management Information: Purpose and nature of the relationship you wish to establish with our Global Dynamic Markets Limited (such as account opening), information on your assets and source of wealth/funds, your experience in capital markets, estimated average transaction volume and count, shareholding percentage, trading ban, precautionary information, collateral, pledge share information.

Transaction Security Information: IP address, connection device and model, system and application user account and password information, location information, log records, browser and time zone information, and traffic data.

All information provided to us is strictly confidential and are not disclosed or revealed to any person or party whatsoever unless we are legally required to do so to a regulatory body or a court of competent jurisdiction in Mauritius or abroad.

Your personal data is processed by Global Dynamic Markets Limited in its capacity as data controller within the Data Protection Act 2017.



6. Data record keeping

Under the Mauritian law and as required by the Financial Services Commission, we are required to keep personal data as follows:

- As long as you are a client of the Company
- Where the purpose for keeping personal data has lapsed, the Company shall destroy the data as soon as is reasonably practicable and notify any processor holding the data to destroy the data as specified by the Company
- When a person is no more a client of the Company, for a period not exceeding ten (10) years in line with the prevailing laws of Mauritius. After this period, such personal data will be destroyed.

Where you have consented to receive updates and similar materials from us, any personal data held by us for that purpose will be kept by us until such time that you notify us that you no longer wish to.

7. Your rights

Should you believe that any personal data we hold relating to you is incorrect or incomplete, you may request to see this information, rectify it or have it deleted. If you still feel that your personal data has not been handled appropriately according to the law, you may contact the Data Protection Office in Mauritius and file a complaint with them.

In the event that you wish to complain about how we have handled your personal data, please contact us on info@dynamicmarkets.com