

# CARAVELLE INVESTMENTS

## DATA PRIVACY POLICY

25 APRIL 2025



At Caravelle Investments, we recognise the importance of personal information entrusted to us. It is one of our fundamental responsibilities as a financial institution to ensure that we protect the information entrusted to us by our clients and our website visitors.

This Privacy Notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. It applies to any personal information you provide to Caravelle and subject to local law, any personal information we collect from other sources.

Throughout this Notice, “Caravelle” refers to Caravelle Investments, including its affiliated companies and subsidiaries (also referred to as “we”, “us” or “our”).

**To preserve the confidentiality of all information you provide to us, we maintain the following privacy principles:**

- We only collect personal information that we believe are relevant and required to understand your needs and to conduct our business.
- We use your personal information to provide you with better customer services and products.
- We will not disclose your personal information to any external organisation unless we have your consent or are required by law.
- We may be required from time to time to disclose your personal information to Governmental or judicial bodies or agencies or our regulators, but we will only do so under proper authority.
- We aim to keep your personal information on our records accurate and up-to-date.
- We maintain strict security systems designed to prevent unauthorized access to your personal information by anyone, including our staff.

**Lawful basis for processing your personal data**

Your privacy is protected by law and this section explains how that works. In accordance to the Data Protection Act, we are allowed to use your personal information only if we have a proper reason to do so. This includes sharing it outside Caravelle. The law states that we must have one or more of these reasons:

- Fulfil a contract we have with you, or
- When it is our legal or regulatory duty, or
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you

## Your Consent

Caravelle will process your personal data only after obtaining your express consent, where it is necessary for the performance of a contract to which you are a party or to enable you to enter into a contract or in accordance with the law. You give your consent to us through our account opening mandate and during your relationship with us. ***We will only disclose your personal data if:***

- the law requires it or such personal data is exempted from data protection laws;
- such disclosure is for the administration of justice or in the public interest or relates to the use of a unique identification number to facilitate sharing information and avoid multiple registrations among public sector agencies;
- such disclosure is necessary for the performance of a contract to which you are a party or to enable you to enter into a contract; or
- such disclosure is required to protect your vital interests;
- you agreed that we may disclose your data for the purposes for which such data has been collected and of which you have been informed.

## Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

## What type of information Caravelle may collect from you?

Type of Personal Information	Description
National Identifier	A number given to you by a government to identify who you are, such as a National Identity Card, Passport.
Contact details	Where you live and how to contact you
Socio-Demographic	This includes details about your work or profession, nationality, education and where you fit into general social...(Social Research/Survey) or income groupings.

Financial	Your financial position, status and history.
Contractual/ Transactional	Details about payments to and from your accounts with us, and insurance claims you make.
Locational	Location data from your mobile phone and the IP address of your connection when using a computer while using our myCaravelle Mobile application or our Online Portal. Data pertaining to the shops where you make a purchase with your Caravelle Card – Rewards.
Transactional	Details about payments to and from your accounts with us and insurance claims you make.
Behavioural	Details about how you use our products and services.
Usage Data	Other data about how you use our products and services.
Technical	Details on the devices and technology you use.
Communications	What we learn about you from letters, emails and conversations between us.
Social relationships	Your family, friends and other relationships.
Open Data and Public Records	Details about you that are in public records such as the Electoral Register and information about you that is openly available on the internet.
Documentary Data	Details about you that are stored in documents in different formats or copies of them. This could include things like your passport, drivers license or birth certificate.
Special categories of personal data	The law and other regulations treat some types of personal information as special. We will only collect and use these types of data if the law

	<p>allows us to do so:</p> <ul style="list-style-type: none"> <li>Racial or ethnic origin</li> <li>Political Opinion</li> <li>Religious or Philosophical beliefs</li> <li>Trade Union membership</li> <li>Genetic and bio-metric data</li> <li>Physical or mental health or condition</li> <li>Sexual orientation, practices and preferences</li> <li>Criminal convictions and offences</li> </ul>
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#### **Why does Caravelle collect information about you?**

We collect personal information to carry out and administer our services and products to you. These may include claims management, risk management consulting and other forms of insurance services (including underwriting of insurance products and reinsurance), employee benefits program administration and investment advisory services.

#### **How does Caravelle collect your personal information?**

When you request our services, we ask you to provide accurate and necessary information that enables us to respond to your request.

While the personal information we collect may come directly from you, it may also be provided by our affiliates or other third parties (such as employers, insurance companies, insurance brokers or agents, credit organisations, motor vehicle and driver licensing authorities, financial institutions, medical professionals, etc.). If you provide personal information about other individuals (such as employees, dependents, etc.), you must obtain their consent prior to your disclosure to Caravelle .

#### **Caravelle may collect information online when you:**

##### **Visit Caravelle Website**

For purposes of this Notice, "website" includes our mobile applications.

By using Caravelle website and associated microsites, you agree to the processing of your personal information as explained in the Terms and Conditions, including placing cookies on your device as described in the Cookie Notice.

We collect personal information to fulfil your requests for products and services and to improve your online experience. We strive to limit the amount of personal information collected to support the intended purpose of the collection.

In some instances, Caravelle automatically collects certain types of information when you visit our website and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. The collection of this information will allow us to improve the effectiveness of Caravelle website and our marketing activities.

### **Use Cookies**

Caravelle may collect information during your visit to a Caravelle website through the use of cookie technology. A cookie is a piece of programming information contained in a very small text file that is placed in your Internet browser or elsewhere on your hard drive. You can control acceptance of cookies by modifying your Internet browser preferences. You have the ability to accept all cookies, to be notified when a cookie is set or to reject all cookies. Please note that, if you choose to block all cookies (including essential cookies) you may not be able to access all or part of our site and may be unable to use those services or engage in activities that require the placement of cookies. Caravelle uses cookies to distinguish you from other users of our website and to help us compile aggregate statistics about usage of our website.

In addition, on some occasions, Caravelle may use tracking technologies such as web beacons, to collect information about your visits to Caravelle website. These are small electronic images embedded in web content or e-mail messages and are ordinarily not visible to users. Like cookies, this tracking technology enables us to track pages and content accessed and viewed by users on Caravelle website. The use of these technologies also helps us to provide you with a positive experience when you browse our website, and it also helps refine our content and personalize your experience. For more detailed information, you may wish to visit our Cookie Notice.

### **Engage with Caravelle through Social Media**

You can engage with us through social media website or through features such as plug-ins or applications on Caravelle website that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our website through social media sites, plug-ins or other

applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customize your privacy settings and how third party social media sites handle your personally identifiable information, please refer to their privacy help guides, privacy statements and terms of use.

### **Access our Website through Mobile Devices**

If you access our website on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information.

When you provide us your mobile device phone number as your contact phone number, you consent to the use of your mobile device phone number for the purposes identified in this Notice. If you choose to receive notifications from us on your mobile device (e.g. text notifications), you also consent to the use of your mobile phone number for that purpose.

### **Marketing**

We may use your personal information to tell you about relevant products and offers. This is what we mean when we talk about 'marketing'.

We may collect personal information from visitors of our website and those individuals that participate in a contest or promotion (online or over the telephone, or at one of our branches). Such information is only collected from individuals who voluntarily provide us with their personal information.

The personal information we have for you is made up of what you tell us and data we collect when you use our services or from third parties we work with.

We study this to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'.

You can choose to receive marketing and other promotional materials by e-mail. If you do receive email or promotional direct mailings, you will always have an opportunity to opt-out. If at any time you would like us to cease sending you direct mailings, please contact us or our representatives by writing on [legal@caravellemarkets.com](mailto:legal@caravellemarkets.com)

### **How does Caravelle use your personal information?**

The personal information we collect may be used to:

- provide information and services as requested by you;
- determine eligibility and process applications for products and services;
- understand and assess your ongoing needs and offer products and services to meet those needs;

- carry out communication, service, billing and administration;
- administer claims;
- obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit;
- market products and services (subject to your consent); and
- conduct processing necessary to fulfil other contractual obligations

With your consent, we may also use your personal information for additional purposes.

### **Does Caravelle disclose your personal information?**

#### **Business Partners**

We disclose personal information to business partners that are necessary to provide our products and services. Examples include: credit and fraud reporting agencies, reinsurers, medical service providers, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process.

We do not rent, sell or otherwise disclose personal information about our clients with unaffiliated third parties for their own marketing use.

#### **Authorised Service Providers**

We may disclose your information to service providers we have retained to perform services on our behalf. These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements.

#### **Legal Requirements and Business Transfers**

We may disclose personal information (i) if we are required to do so by law or legal process, (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that Caravelle is subject to a merger or acquisition to the new owner of the business. Disclosure may also be required for company audits or to investigate a complaint or security threat.

### **Does Caravelle transfer your personal information across geographies?**

Caravelle may transfer certain personal information across geographical borders to Caravelle entities or service providers in other countries working on our behalf in accordance with applicable law. We may transfer personal data to another country where you have given explicit consent to the proposed transfer.

Notwithstanding the above, consent is not necessary in the case of Reinsurance.



### **Does Caravelle have security measures in place to protect your information?**

Caravelle has implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

### **How can you access and update your information?**

Caravelle takes reasonable steps to keep your personal information accurate and complete. You can access or update your personal information in the following ways.

#### **Profile**

To amend your personal data, you can reach us on [legal@caravellemarkets.com](mailto:legal@caravellemarkets.com) or visit your nearest branch.

#### **Mobile Devices**

If you previously chose to receive push notifications on your mobile device from us but no longer wish to receive them, you can manage your preferences either through your device or the application settings. If you no longer wish to have any information collected by the mobile application, you may uninstall the application by using the uninstall process available on your mobile device.

#### **Cookies**

As described in our Cookie Notice, you can adjust your browser settings to accept or refuse cookies.

#### **Email**

Contact us at the e-mail or postal address listed in the "Contact Us" section at the bottom of this Notice. Please include your current contact information, the information you are interested in accessing and your requested changes. We will provide you access to the personal information requested, subject to reasonable limitations provided by law, unless it infringes on the privacy of other individuals.

If we do not provide you with access, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

### **How Caravelle uses your information to make automated decisions?**

We sometimes use systems to make automated decisions based on personal information we have or allowed to collect from others about you and your business. This helps us to make sure our decisions are quick, fair, efficient and correct, based on what we know. These automated decisions can affect the products, services or features we may offer you now or in the future or the price that we charge you for them.

You have the right to object to an automated decision.

## **What are your legal rights?**

### **Right of Information and Access**

This right enables you to receive a copy of all your personal information we hold about you free of charge and to check that we are lawfully processing it.

### **Right to rectify**

This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us by a supplementary statement.

### **Right of Erasure**

This enables you to ask us to delete or remove personal data where it is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified, if applicable, at the time of your request.

### **Right to object**

Where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms, you have the right to object in writing at any time to the processing of your personal data.

### **Right to restrict**

This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy;
- Where our use of the data is unlawful but you do not want us to erase it;
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

### **Right to withdraw consent at any time**

This will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products and services to you. We will advise you if this is the case at the time you withdraw your consent.

**If you wish to exercise any of the rights set out above, please write to us at the following address:**

***The Legal Department***

***Caravelle Investments***

***3 Emerald Park, Trianon, Quatre Bornes 72257, Mauritius***

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up your response.

### **Time Limit to respond**

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **Third Parties**

We ask third-party service providers to agree to our privacy policies if they need access to any personal data to carry out their services.

We will not disclose your personal data to external organisations that are not our service providers, unless you gave us your consent, or unless we may do so by law, or if it is necessary for the conclusion or performance of our agreement with you.

### **Does Caravelle collect information from children?**

Children have the same rights as adults over their personal data. They can exercise their own rights as long as they are competent to do so. Where a child is not considered to be competent, an adult with parental responsibility may exercise the child's data protection rights on their behalf. For children under 16, we need to get consent from whoever holds parental responsibility for them.

Our website are not directed to children and we do not knowingly collect personal information from children on our website.

### **Storing Personal Data**

We store your personal data during your relationship with us and even after we have ceased our relationship, as required by law.

### **Your right to lodge a complaint with the Commissioner**

Please let us know if you are unhappy with how we have used your personal information. You can contact the Data Protection Officer. You also have the right to lodge a complaint with the Commissioner. Find out on their website how to report a concern.

### **Contact Us**

If you have any questions relating to this Notice, please contact our Legal Counsel at Caravelle Investments, 3 Emerald Park, Trianon, Quatre Bornes 72257, Mauritius.

### **Changes to this Notice**

We may need to update this Notice from time to time. We encourage you to periodically check our website so that you will be aware of our latest privacy practices. This Notice was last updated on April 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.