

PRIVACY NOTICE

1. PURPOSE OF THIS NOTICE

This notice describes how and why Fortis Solution K.F.T. (“we”, “our”, and “us”) collect and use personal data and provides information about individuals’ rights in accordance with data protection legislation. It applies to personal data provided to us, both by individuals themselves or by others. Personal data is any information relating to an identified or identifiable living person.

‘Data protection legislation’ means all applicable privacy and data protection legislation and regulations including:

before 25 May 2018, the Data protection Act 1998;

and from 25 May 2018 onwards, the GDPR, and any applicable national laws, regulations and secondary legislation, relating to the processing of personal data and the privacy of electronic communications, as amended, replaced or updated from time to time;

Please read the following carefully to understand our practices regarding your personal data and how we will treat it.

2. MAIN INFORMATION

For the purpose of the Data Protection Legislation and this notice, we are the ‘data controller’. This means that we are responsible for deciding how we hold and use personal data about individuals. We are required under the Data Protection Legislation to notify you of the information contained in this privacy notice.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

We have appointed a person with the responsibility for data protection compliance within the firm and is our Data Protection Point of Contact for assisting with enquiries in relation to this privacy notice or our treatment of your personal data. Should you wish to contact our Data Protection Point of Contact you can do so using the contact details noted at our internet-site.

3. HOW WE MAY COLLECT YOUR PERSONAL DATA

We will only collect personal data necessary for agreed purposes and we ask our clients to only share personal data where it is strictly needed for those purposes.

Where we process personal data, we ask our clients to provide the necessary information to the data subjects regarding its use.

We obtain personal data for example, when:

- You request a proposal from us in respect of the services we provide;
- We obtain relevant information from third parties from the routine checks conducted before we accept you as a client;
- You engage us to provide our professional services and also during the provision of those services;
- You contact us by email, telephone, post, portal or social media (for example when you have a query about our services); or
- You provide an Annual Data Questionnaire; or
- from third parties (for example Power of Attorney, executors, solicitors, financial advisors) and/or and /or publicly available resources (for example, from Companies House)

4. THE KIND OF PERSONAL DATA WE HOLD

We process many categories of personal data, including as appropriate for the services we are providing

Corporate clients (and individuals associated with our corporate clients)

The personal data we hold may include the following:

- Director, secretary and shareholder details such as title, position, full name, contact details (including address, email address etc.), contact details history and share dealings;
- Family member details (if relevant to the service);
- Dates of birth, gender and/or age;
- Copies of passport, driving license or other identification documentation requested from directors, shareholders or other key personnel;
- Records of your contact with us including meeting notes, telephone messages, letters, emails, portal information exchange and social media;
- Details of related parties and transaction with them;
- Transactions with employees and related documentation;

- Details of the contract we have with you in relation to the provision, or the proposed provision, of our services;
- Details of any services received from us;
- Our correspondence and communications with you;
- Information about any complaints and enquiries you make to us;
- Information we receive from other sources, such as publicly available information, information provided from third parties.

Personal clients

The personal data we hold may include the following:

Sole trader, Partner or individual client details such as title, position, full name, contact details (including telephone, mobile, address, email address etc.), contact details history.

- Dates of birth, gender and/or age;
- Copies of passport, driving license or other identification documentation;
- Records of your contact with us including meeting notes, telephone messages, letters, emails, portal information exchange and social media;
- Details of related parties and transaction with them;
- Transactions with you or employees and related documentation;
- Details of the contract we have with you in relation to the provision, or the proposed provision, of our services;
- Details of any services received from us;
- Our correspondence and communications with you;
- Information about any complaints and enquiries you make to us;
- Information we receive from other sources, such as publicly available information, information provided from third parties.

5. HOW WE USE PERSONAL DATA WE HOLD

We may process personal data for purposes necessary for the performance of our professional services contract with our clients and to comply with our legal obligations. This may include processing personal data of an employee, subcontractor, supplier or customer of our clients or an associate of our clients.

We may process personal data for the purposes of our own legitimate interests provided that those interests do not override any of our clients (and individuals associated with our clients) own interests, rights and freedoms which require the protection of personal data. This includes processing for marketing, business development, and management purposes.

We may process personal data for certain additional purposes with consent, and in these limited circumstances where an individual data subject consent is required for the processing of personal data, then the individual data subject has the right to withdraw consent to processing for such specific purposes.

Please note that we may process personal data for more than one lawful basis depending on the specific purpose for which we are using personal data.

Situations in which we will use personal data

We may use personal data in order to:

- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) e.g. providing advice;
- carry out our obligations arising from any agreements entered into between our clients and us (which will most usually be for the provision of our services) where you may be a customer of our client;
- provide information related to our services and our events and activities that are requested from us or which we feel may be of interest provided you have consented to be contacted for such purposes;
- seek thoughts and opinions on the services we provide; and
- notify about any changes to our services.

In some circumstances we may anonymize or pseudonymize the personal data so that it can no longer be associated to an individual, in which case we may use it without further notice to you.

If an individual refuse to provide us with certain information when requested, we may not be able to perform the contract we have entered into with the client. Alternatively, we may be unable to comply with our legal or regulatory obligations.

We may also process personal data without the individual's knowledge or consent, in accordance with this notice, where we are legally required or permitted to do so.

Data retention

We will only retain personal data for as long as is necessary to fulfil the purposes for which it is collected.

When assessing what retention period is appropriate for your personal data, we take into consideration:

- the requirements of our business and the services provided;
- any statutory or legal obligations;
- the purposes for which we originally collected the personal data;
- the lawful grounds on which we based our processing;
- the types of personal data we have collected;

- the amount and categories of your personal data; and
- whether the purpose of the processing could reasonably be fulfilled by other means.

Change of purpose

Where we need to use personal data for another reason, other than for the purpose for which we collected it, we will only use personal data where that reason is compatible with the original purpose.

Should it be necessary to use personal data for a new purpose, we will notify the individual and communicate the legal basis which allows us to do so before starting any new processing.

Disclosure of Personal

Information Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorized by law.

6. DATA SHARING

Why might we share personal data with third parties?

We will share personal data with third parties where we are required by law, where it is necessary to administer the relationship between us and our clients or where we have another legitimate interest in doing so.

Which third-party service providers process personal data?

“Third parties” includes third-party service providers and other professional advisers. The following activities are carried out by third-party service providers: IT and cloud-based services, website hosting, data back-up, professional advisory services, and banking services.

All of our third-party service providers are required to take commercially reasonable and appropriate security measures to protect personal data. We only permit our third-party service providers to process personal data for specified purposes and in accordance with our instructions.

What about other third parties? We may share personal data with other third parties, for example in the context of the possible sale or restructuring of the business. In this event we will take appropriate measures to ensure that the security of the client personal data continues to

be ensured in accordance with data protection legislation. If a change happens to the business, then the new owners may use our client data in the same way as set out in these terms.

We may also need to share personal data with a regulator or to otherwise comply with the law.

7. DATA SECURITY

We have put in place commercially reasonable and appropriate security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify the individual and any applicable regulator of a suspected breach where we are legally required to do so.

8. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Individuals' duty to inform us of changes.

It is important that the personal data we hold about you is accurate and current. Should your personal information change, please notify us of any changes of which we need to be made aware by contacting us, using the contact details below.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Individuals' rights in connection with personal data Under certain circumstances, by law you have the right to:

- Request access to your personal data. This enables you to receive details of the personal data we hold about you and to check that we are processing it lawfully.
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there 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 exercised your right to object to processing (see below).
- Object to processing of your personal data 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 basis. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal data to you or another data controller if the processing is based on consent, carried out by automated means and this is technically feasible.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

_____ will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

9. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where an individual may have provided consent to the collection, processing and transfer of their personal data for a specific purpose (for example, in relation to direct marketing that they are indicated you would like to receive from us), they have a right to withdraw consent for that specific processing at any time. To withdraw your consent, please email of our contact in this site.

Once we have received notification that you have withdrawn your consent, we will no longer process your personal information (personal data) for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. COOKIES

Cookies are simple text files that are stored on your computer or mobile device by a website's server. Each cookie is unique to your web-browser. It will contain some anonymous information such as a unique identifier, website's domain name, and some digits and numbers.

We use the following types of cookies:

- Necessary cookies

Necessary cookies allow us to offer you the best possible experience when accessing and

navigating through our website and using its features. For example, these cookies let us recognize that you have created an account and have logged into that account.

- Functionality cookies

Functionality cookies let us operate the site in accordance with the choices you make. For example, we will recognize your username and remember how you customized the site during future visits.

- Analytical cookies

These cookies enable us and third-party services to collect aggregated data for statistical purposes on how our visitors use the website. These cookies do not contain personal information such as names and email addresses and are used to help us improve your user experience of the website.

If you want to restrict or block the cookies that are set by our website, you can do so through your browser setting. Alternatively, you can visit www.internetcookies.com, which contains comprehensive information on how to do this on a wide variety of browsers and devices. You will find general information about cookies and details on how to delete cookies from your device.

11. POLICY UPDATES

This Policy may change from time to time and is available on our website. If you have any queries or complaints about our Privacy Policy please contact us at the address given on our site.