

Privacy Policy

This document applies to all personal information held by HAWEX as the controllers of your personal data and goes into detail on how we process your data, why we process it, with whom this data may be shared, in what situations we may share this data and all the measures we are taking to ensure that your data is safe and secure. The terms of this policy will apply for all personal information provided to HAWEX, and will continue to apply for as long as we hold your personal data in terms of the law. This policy shall also apply to any personal information collected on our social media pages and thus if you provide us with personal data on these pages, such information shall also be stored in terms of this policy.

On our website, you may also find links to other websites which are not managed or owned by HAWEX. HAWEX is not responsible for any such websites and this privacy policy shall not apply in this regard. The businesses operating these websites, may or may not have their own privacy policy and in this regard, HAWEX is not responsible for the way such companies manage the processing of your personal data.

HAWEX seeks to provide the best possible protection to your data given to us through our website.

- 1. Data Controller**
- 2. What is GDPR?**
- 3. What is Personal Data?**
- 4. What are Special Categories of Personal Data?**
- 5. What are Controllers and Processors?**
- 6. Data we collect, Legal Basis for Processing your Personal Data and Retention periods**
- 7. How we store and transmit Personal Data**
- 8. Cookie Policy**
 - I. How we use cookies**
 - II. Types of cookies**
 - III. Our cookies**
 - a) Strictly Necessary Cookies**
 - b) Functionality**
 - c) Security**
 - d) Statistics**
 - e) Marketing and Advertising Cookies**
 - IV. Third party cookies**
 - V. Controlling and managing cookies**
- 9. Your Rights**
- 10. Transfers to Third Countries**
- 11. Data Security Measures**
- 12. Breach**
- 13. Updates to this Policy**
- 14. Hyperlinks**
- 15. Contacting Us**

1. Data Controller

The data controller as defined under the Regulation (EU) 2016/679 which is generally referred to as the General Data Protection Regulation (hereinafter referred to as “GDPR”), is HAWEX P.L.C, a company registered under the laws of Malta, having company registration number C 94685 and having registered address at 6, Villa Gauci, Mdina Road, Balzan, BZN 9031, Malta

2. What is GDPR?

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) or “GDPR” is a European regulation intended to protect Personal Data of individuals. We collect various kinds of Personal Data from you and it is thus very important that your Personal Data is managed in terms of this regulation. Personal Data is very important for us and thus we strive to ensure the highest level of its protection.

3. What is Personal Data?

Personal Data is personal information about an individual, like you. We collect such information about our customers for relationship management, statistical reasons and for marketing purposes and also on our employees or potential employees when they apply for a position with us. We may also collect some personal information from other individuals who are not our customers, for marketing purposes, subject to their consent.

Personal Data may also be of a general nature and of a special nature. Generic Personal Data refers to data such as names, surnames, contact details and similar data which can be used to identify a person. Special categories of Personal Data relate to more confidential kind of Personal Data such as health data. Information regarding the different kinds of Personal Data we collect can be found in section 6 of this document.

4. What are Special Categories of Personal Data?

Certain more sensitive kind of Personal Data is defined under law as Special Categories of Personal Data, which relates to:

- Racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs;
- Trade union membership;
- Genetic data;
- Biometric data for the purpose of uniquely identifying a natural person;
- Data concerning health;
- Data concerning a natural person's sex life or sexual orientation

We will not process such Personal Data unless authorized by law. In any case, we will always specify the purpose where such Personal Data shall be used and on what legal basis. We will also only use such Personal Data for the purposes that such Personal Data would be collected and not for any other purposes.

5. What are Controllers and Processors?

When you provide your Personal Data to a third party, you are passing such data to either a controller or a processor.

A Controller of your Personal Data is an individual or a company who has the power to determine the exact uses of the Personal Data you have supplied to him. On the other hand a Processor is a third party who is processing and thus utilising your Personal Data on behalf of a controller.

6. Data we collect, Legal Basis for Processing your Personal Data and Retention periods

This section shall outline the various ways we collect Personal Data from you from different situations. In this regard, all Personal Data collected must have a proper legal ground justifying collection and such is stated in each situation where Personal Data is Collected. Finally, the retention period for each set of Personal Data Collected is also listed herein.

BROWSING			
Description	Data Collected	Legal Basis	Retention Period
When you browse this website, we may collect data through some tracking cookies as explained in the cookie section of this Policy. Otherwise, we do not collect Personal Data unless you voluntarily and knowingly provide it to us, for example by creating an account or signing up for our services.	Kindly refer to cookie section.	i) Consent, when dealing with non-essential cookies.	Kindly refer to cookie section.

CREATING AN ACCOUNT ON OUR PLATFORM

Description	Data Collected	Legal Basis	Retention Period
When creating an account on our platform you would be providing Personal Data which is required to be able to provide you with our services.	i) Name and Surname ii) Email iii) Contact numbers iv) Date of Birth v) Identification Documentation vi) General KYC Information	i) Contract: You would be providing us with your personal data to part of an agreement that you would have entered into for which we need your Personal Data ii) Legitimate Interest: After creating your account, we would need to request updated information for our KYC function as required under law.	Five years after account is terminated.

CONTACTING OUR CUSTOMER CARE TEAM/SOCIAL MEDIAL TEAMS

Description	Data Collected	Legal Basis	Retention Period
Should you contact our customer care or social media teams, we shall collect some Personal Data to be able to process your request.	i) Name and Surname ii) Email iii) Contact Number	i) To protect our legitimate interest	6 months

WHEN YOU APPLY FOR A POSITION WITH HAWEX

Description	Data Collected	Legal Basis	Retention Period
When you apply for a position with us, we would need to process your Personal Data to be able to verify your suitability for the role you have applied to.	i) Name and Surname ii) Your CV and Personal Data contained within iii) Residential Address	i) Consent	Up till a year after termination date

	iv) Contact Number v) Email vi) Date of Birth		
WHEN YOU VISIT OUR PREMESIS			
Description	Data Collected	Legal Basis	Retention Period
When you visit our premises, we collect CCTV data for security purposes.	i) CCTV Footage	i) To protect our legitimate interest	CCTV Deleted automatically after 7 days

Should in any event, we are required to keep your Personal Data for any longer period as allowed by law, your Personal Data shall be kept secure and shall be deleted when we are allowed by law to delete such Personal Data.

7. How we store and transmit Personal Data

In addition to the required information sharing described above, we use the services of third party agents, such as e-mail service providers and mail houses for the purpose of mailing materials to our clients. These parties are contractually prohibited from using Personal Data for any purpose other than for the purpose specified in their respective contracts. We do provide non-personally identifiable information to certain service providers for their use on an aggregated basis for the purpose of performing their contractual obligations to us. We do not permit the sale of Personal Data to third parties for any use unrelated to our operations or use of Personal Data by third party for their own purposes.

Below is a list and description of the kinds of services providers to whom we provide your Personal Data.

IT Security	Service providers who help us in ensuring that your data remains secure
IT Backups	Service providers who assist us in relation to backups for business continuity purposes so that your data is not lost
Banking establishment and other financial institutions	Correspondent banks, insurance companies, payment systems, agency companies, business partners of the Company or customers, financial service intermediaries etc.

Public Bodies	Public institutions, public officials, investigatory authorities, courts, prosecutor's office, subjects of operational activities, orphans' courts, notaries, law enforcement officials, judicial and investigatory authorities of other member states and foreign countries, tax authorities, arbitration courts, out-of-court dispute resolution bodies
Marketing	Service providers who assist us in relation to marketing and website
Storage	Service providers who assist us in storing and archiving data

8. Cookie Policy

Our website only uses “cookie” technology as a tracking tool. Cookies do not retain registered guests’ information provided during the online reservations. Cookies identify your browser, rather than you and cannot be used by themselves to disclose your individual identity. Cookies enable us to track the number of page visits from the same computer or browser to be aggregated for statistical purposes.

Cookies do not corrupt or damage your computer, programs, or computer files.

The purpose for which cookies -- other than those which are either exclusively intended to enable or facilitate communication by electronic means or strictly necessary for the provision of an online communication service at your express request -- are used on our website is set forth in a banner appearing the first time you land on such website.

TYPES OF COOKIES

The below are different kinds of cookies including their functions that you may find on different websites.

<u>Type of Cookies</u>	<u>Use of Cookies</u>
Strictly Necessary	These cookies are essential for the proper functioning of the website and without these, the websites would not work properly.
Functionality	These cookies store specific functional data such as account name, details, location and other similar information.
Security	These cookies are used to enhance the security of the website and detect security threats.
Statistics	These cookies are used to gather statistical data about the users on the website, their activities and their preferences. Other information that may be gathered includes, website

	pages visited, duration of visit, what was clicked on and other similar information.
Marketing & Advertising	These cookies are used in relation to adverts on websites to properly detect and analyse the effectiveness of these ads. Information collected would include clicks on the ads, number of times the adds have been displayed, number of unique visitors and similar information. Such adds may also be used to build user profiles to gather individual preferences.
Third Party	These cookies would be generated through third parties when the website would be using third party applications. Examples would be social media pages which would have integrated functions on websites. Such activities would generate third party cookies.

HOW WE USE COOKIES

We use our cookies as follows:

- i. To log in into your account;
- ii. To assist you in presenting proper site content which is relevant to your experience;
- iii. Assist us to monitor site performance;
- iv. To save user input when required to insert certain data on our website pages;
- v. For authentication purposes;
- vi. For the use and to enable the playing of multimedia files;
- vii. For statistical purposes;
- viii. Social Media and other third-party integration.

OUR COOKIES

The below is a list of cookies originating from our domain.

Strictly Necessary Cookies

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>

Functionality

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>
cbcc771b09c33a08c4aa8d62901c175e	Current user session data	Personal Account	Coo	15 min
groupSign	Uses to store the ID of the selected documents for group signature	Personal Account		Session
PHPSESSID	Data for the current php session	Personal Account		Session
mb-language	Uses to store the user's language	Personal Account		Session

Security

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>
mb-csrf	Uses to validate data sent through forms	Personal Account		Session

Statistics

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>
_ga	This cookie name is associated with Google Universal Analytics, a significant update to Google's popular analytics service. This cookie is used to differentiate individual users by assigning a random number as the customer ID. It is part of every page request on a	Personal Account		2 year

	specific website and is used to calculate user data, sessions, and campaigns for analytic reports on the site.			

Marketing and Advertising Cookies

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>

THIRD PARTY COOKIES

The below is a list of cookies originating from a third party:

<u>Cookie Name</u>	<u>Use</u>	<u>Where</u>	<u>Provider</u>	<u>Expiry</u>

CONTROLLING AND MANAGING COOKIES

You may set your browser to block Cookies, although doing so will affect your ability to perform certain transactions, use certain functionality, and access certain content on our website. Should you wish to change your content settings in relation to cookies, this can be done by following the below links. In this regard, modern browsers provide measures to control cookie features, such as length of time saved. Kindly note however that certain functions on our website may not function properly if you disable cookies.

The below are the most popular browsers. Kindly follow the links to manage your cookies.

- i. Chrome <https://support.google.com/chrome/answer/95647?hl=en-GB>
- ii. Safari https://support.apple.com/kb/PH19214?viewlocale=en_US&locale=en_US
- iii. Internet Explorer <https://support.microsoft.com/en-us/hub/4230784/internet-explorer-help#ie=ie-11>

- iv. Firefox <https://support.mozilla.org/en-US/kb/how-do-i-turn-do-not-track-feature>
- v. Opera <https://help.opera.com/en/latest/web-preferences/#cookies>

You may set your browser to block Cookies, although doing so will affect your ability to perform certain transactions, use certain functionality, and access certain content on our website.

9. Your Rights

You have certain rights under law to your Personal Data.

- 1) You have the right to access your data. You have the right to ask for a copy of your Personal Data.
- 2) You have the right of rectification of incorrect data. If any data we have is incorrect, you have a right to ask for correction of such data.
- 3) You have the right to be forgotten and that your data is erased after the passage of time. You may file a request, so that any data that we have on you is deleted. As stated above, due to legal requirements, your data will be held by us for the periods stated in the data retention section and then deleted.
- 4) You have the right to restriction of procession. This can be done in the following cases:
 - i. Where you are contesting the accuracy of the data, while such a claim is being checked;
 - ii. If we process your data unlawfully
 - iii. If we no longer need your data but are keeping the data because we need it for a legal claim;

Kindly note however the if you exercise this right, it will hinder our ability to provide you with the required services, since we may need your Personal Data to be able to provide you with our services.

- 5) You have the right to data portability. Your data may be requested in a machine-readable format and you may also request that your data is transferred directly to another person or service provider directly.
- 6) You may object to the processing of your data. You may at any time inform us that you are objecting to the use of your data for direct marketing and after which we shall stop using your data for such purposes.
- 7) If you have provided consent for the processing of your data you have the right to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

In making your request in relation to the above, please not that:

- We will analyse your request and provide you with a reply within 1 month, except in extreme situations as allowed under law. In such a case we will provide information as to why your request was not acceded to within the 1 month period.

- We have the right to refuse your request, if your request is not justified. In this case we shall inform you as to the reasons of why your request was refused.
- We have the right to charge a fee or refuse your request in extreme situations where your requests are manifestly repetitive or excessive.
- When you are making a request, we may request documentation to identify the person making the request.

You have the right to lodge a complaint to the data protection authority of your habitual residence if you believe that we have not complied with the requirements of the law.

In order to protect your Personal Data, we will require that you prove your identity to us in relation to your request to access your Personal Data, which may consist of a copy of a government-issued identification, your signature and correspondence address so we can check them against our records and satisfy ourselves as to your identity. The above information is required to create an audit trail of how the request has been handled. Where a request is made, any correspondence or application may be kept and added to your Personal Data.

10. Transfers to Third Countries

We shall strive to send your data only to other EU countries, the UK or other countries which ensure proper protection for your data. When transferring your data to countries which are not deemed as such, proper measures in terms of the law shall be applied to ensure the protection of your Personal Data. In cases where such measures cannot be achieved, Personal Data shall only be sent to these countries if necessary, to perform our services and also subject to your prior consent. Some of the recipients referred to above are located in or process Personal Data outside of your country. The level of data protection in another country may not be equivalent to that in your country. However, we only transfer your Personal Data to countries where the EU Commission has decided that they have an adequate level of data protection or we take measures to ensure that all recipients provide an adequate level of data protection.

11. Security of Data

We shall take all the necessary measures as required by law to ensure proper security and protection to your Personal Data. Such measures may include encryption, use of firewalls, anti-virus software and specialized security software, access restrictions and limitations, strict enforcement of policies and any other measures that we may enforce from time to time. Our measures shall strive to ensure that:

- There is no unlawful destruction of your Personal Data;
- That your Personal Data is not subject to unauthorized access;
- That your Personal Data is not subject to unauthorized disclosure;
- That your Personal Data is not subject to unauthorized modifications.

Your data security shall also be in line with standard card payments security standards.

Despite our best efforts however, we cannot provide a 100% guarantee in relation to our system security.

12. Breach

In the event of a Data Breach following your Personal Data, we shall always abide by the law and inform you and the competent authorities as required.

13. Updates to this Policy

This data privacy statement was last updated on the _____ in line with the last EU legislation to meet the GDPR requirements. In the future, we may need to make additional changes. All additional changes will be included in the latest data privacy statement published on this website, so that you will always understand our current practices with respect to the information we gather, how we might use that information and disclosures of that information to third parties. You can tell when this privacy statement was last updated by looking at the date at the top of the statement. Any changes to our statement will become effective upon posting of the revised statement on this site. We will seek your express consent to any changes to how we use or disclose your Personal Data if requested by law but otherwise use of this site or our services following such changes constitutes your acceptance of the revised statement then in effect.

14. Hyperlinks

Kindly note that our website contains hyperlinks to other websites. Please note that HAWEX is not responsible for the content of these other websites or their respective adherence to data protection laws and rules. HAWEX does not provide any quality controls to such websites and shall accept no responsibility for their performance, security, accuracy, content or privacy in relation to your personal data.

15. Contacting Us

If you wish to make any inquiry regarding your personal data, wish to have any of your data corrected or request access to your personal data, you may contact us on the below details. Please note that we may charge a fee or refuse requests which are manifestly repetitive or excessive. Any request must be in writing and must also include your name, address and a description of the information or correction required. We may also ask for other identification documentation. Such information is essential so that we can identify you properly.

Email: gdpr@hawex.io

Telephone number: [insert]

Address: 6, Villa Gauci,

Mdina Road,
Balzan, BZN 9031,
Malta

This Policy has been updated on: [date]