



**BPML FREEPORT SERVICES LTD**

*A Subsidiary of Landscape (Mauritius) Ltd*

# **CUSTOMER PRIVACY NOTICE**

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## 1. Introduction

- 1.1. At **BPML Freeport Services Ltd** (hereafter referred to as “**BFSL**”, “we”, “us”, “our”), we value your privacy and are committed to the protection of your personal data. We take your privacy seriously and strive to ensure that your personal data is processed in a lawful, fair, and transparent manner.
- 1.2. This Customer Privacy Notice (“**Notice**”) explains how we process your personal data in accordance with the Mauritius Data Protection Act 2017 (hereafter referred to as the “**MDPA**”).
- 1.3. We recommend you read this Privacy Notice so that you understand our approach towards the processing of your personal data.

## 2. Types of Personal Data We Collect

- 2.1. The type of personal data we process will depend on the purpose for which it is collected. We will only process data that we need for that purpose.
- 2.2. We may collect your personal data in the following ways:
  - a. **Directly from you**, for example:
    - i. Through online registration or inquiry forms on BFSL’s website and KYC form;
    - ii. Through Customer Satisfaction surveys;
    - iii. Through Business Proposals;
    - iv. Through Storage Permit application;
    - v. Through lease agreements.
- 2.3. The types of personal data that we process are detailed below:

Categories of personal data	Details
<b>Contact Details</b>	Name, Phone number, Email address,
<b>Individual Details</b>	Gender, Nationality, Date of birth, Age, Marital status, Proof of address/ Utility bills

<b>Identification Details</b>	National Identity Card Number, Passport number, Business Registration Number (BRN)
<b>Financial Information</b>	Bank statements, Bank Account details, Financial history, Payment details, VAT Registration Number
<b>Credit risk and anti-fraud details</b>	Information which we need for conducting a due-diligence exercise (KYC). This may include data relating to criminal convictions, purchase history, credit history or any other special categories of personal data
<b>Physical Security Information</b>	Closed-circuit televisions (“CCTV”) footage and images.

### 3. Purposes of Processing Personal Data

3.1. We process your personal for the following purposes and legal bases:

Purpose of processing	Legal basis of processing
<ul style="list-style-type: none"> <li>For customer onboarding purposes and for assessing customer credibility and creditworthiness,</li> <li>For providing you with the required services and KYC remediation.</li> <li>For processing payments for the required services.</li> </ul>	<ul style="list-style-type: none"> <li>The processing is necessary for the performance of your contractual relationship as a supplier of <b>BFSL</b>.</li> <li>The processing is necessary for compliance with legal and regulatory obligation, for instance under AML/CFT laws and regulations.</li> </ul>
<ul style="list-style-type: none"> <li>For conducting customer feedback surveys, and for managing our relationship with customers</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests, namely for the proper management of our customer relationships.</li> </ul>
<ul style="list-style-type: none"> <li>For record-keeping purposes.</li> </ul>	<ul style="list-style-type: none"> <li>For compliance with a legal obligation which we are subject to, such as for regulatory audits and to comply with minimum retention periods.</li> </ul>

<ul style="list-style-type: none"> <li>For marketing goods and/or services which may be of interest to you and managing your consent with regards to marketing.</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
<ul style="list-style-type: none"> <li>To confirm and verify your identity when you request to access, rectify, restrict or delete the information we hold on you.</li> </ul>	<ul style="list-style-type: none"> <li>For compliance with a legal obligation to which we are subject to, that is, to verify the identity of a data subject who makes a subject rights request.</li> </ul>
<ul style="list-style-type: none"> <li>To monitor compliance with our policies and procedures.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests pursued by the company.</li> </ul>
<ul style="list-style-type: none"> <li>For physical security and grant you access to <b>BFSL</b>'s premises.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests of ensuring physical security and proper conduct on our premises.</li> </ul>
<ul style="list-style-type: none"> <li>For legal disclosures (with regard to regulatory/ legal requirements or investigations).</li> </ul>	<ul style="list-style-type: none"> <li>The processing is necessary for compliance with our legal and regulatory obligations.</li> </ul>
<ul style="list-style-type: none"> <li>Data transfer and storage to data warehouse.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interests pursued by <b>BFSL</b>.</li> </ul>

3.2. In addition to the above-mentioned specific purposes, we may also process any of your personal data where such processing is necessary for compliance with legal and regulatory requirements which apply to us, or when it is otherwise allowed by law, or when it is in connection with legal proceedings.

#### **4. Mandatory and Voluntary Information**

4.1. To effectively engage in business transactions and fulfil our contractual obligations, certain information is mandatory for you to provide. This mandatory information includes but is not limited to your name, contact information and banking details.

Failure to provide this obligatory information may impact on your contractual relationship.

- 4.2. If you choose to provide more information beyond what is required, we will evaluate its necessity for our purposes. If it is determined to be unnecessary, we will promptly delete it to ensure the protection of your privacy.

## **5. Who has access to your personal data?**

### **5.1. Access to your personal data within BFSL**

- 5.1.1. Employees of **BFSL** who may have access to your personal data are required to keep that data confidential.

### **5.2. Access to your personal data by third parties**

- 5.2.1. We may need to share your personal data with third parties which assist us in fulfilling our responsibilities regarding the purposes listed above. These third parties include companies which provide services to us such as:

- a. For storage solutions;
- b. For security purposes;
- c. For consultancy services;
- d. CCTV surveillance;
- e. Accounting software to process payments.

- 5.2.2. We are also required to disclose your personal data where processing is necessary for us to comply with our legal obligations, including responding to legal processes or lawful requests or where:

- a. We have a duty or a right to disclose in terms of law or for national security and/or law enforcement purposes;
- b. We believe it is necessary to protect our rights;
- c. We need to protect the rights, property or personal safety of any member of the public or a customer of our company or the interests of our company; or
- d. You have given your consent.

5.2.3. We require our service providers and other third parties to keep your personal data confidential and that they only use the personal data in furtherance of the specific purpose for which it was disclosed. We have agreements in place with our processors to ensure that they comply with these privacy terms.

## **6. Personal Data Security**

6.1. We prioritise the security of your personal data by safeguarding its confidentiality, integrity and availability and to ensure business continuity and minimise operational damage by reducing the impact of security incidents.

6.2. We have also put in place procedures to deal with any suspected data security breach and will promptly notify you and the Data Protection Office of any suspected breaches where we are legally required to do so.

## **7. Data Retention**

7.1. We collect and process personal data for specific purposes and will retain it only as long as necessary to fulfil those purposes, unless required for legitimate business or legal reasons. **BFSL** thus retains data for the duration of the supplier's business relationship with **BFSL** and for 7 years after the termination of the contractual relationship, except for:

- CCTV footage which will be retained for 90 days at **BFSL** Office.

## **8. Transfer of Personal Data Outside Mauritius**

8.1. In certain circumstances, your personal data may be transferred to and processed outside Mauritius. We will ensure that any such transfer is compliant with provisions stipulated in the **MDPA**. If your personal data is transferred to a country that does not provide an adequate level of data protection, we will implement appropriate safeguards, such as contractual clauses, to protect your personal data.

## **9. Your responsibilities**

9.1. You are responsible for the data you provide or make available to us, and you must ensure it is honest, truthful, accurate and not misleading in any way. You must ensure

that the data provided does not contain material that is obscene, defamatory, or infringing on any rights of any third party, does not contain malicious code, and is not otherwise legally actionable.

- 9.2. Further, if you provide any data concerning any other person, such as individuals you provide as references, you are responsible for providing any notices and obtaining any consent necessary for us to collect and use that data as described in this notice.

## **10. Your rights**

10.1. As a data subject, you have certain rights concerning your personal data as detailed below and we are committed to facilitating the exercise of these rights:

- **Right of Access:** You have the right to request access to the personal data we hold about you. This includes the right to obtain confirmation of whether we process your personal data and to receive a copy of that information, in an intelligible form, using clear and plain language.
- **Right to Rectification:** If you believe that the personal data we hold about you is inaccurate or incomplete, you have the right to request that we correct or update it.
- **Right to Erasure:** In certain circumstances, you may have the right to request the erasure of your personal data. This includes situations where your personal information is no longer necessary for the purposes for which it was collected, or you withdraw your consent and there is no other legal basis for processing.
- **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data under certain conditions. This means we will temporarily suspend the processing of your personal data, such as when you contest its accuracy or when you object to the processing.
- **Right to Object:** You have the right to object to the processing of your personal data for certain reasons, such as direct marketing or legitimate interests. If you exercise this right, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.

- **Right to Withdraw Consent:** If we rely on your consent as the legal basis for processing your personal data, you have the right to withdraw your consent at any time. This will not affect the lawfulness of processing based on consent before its withdrawal.

10.2. To exercise your right as a data subject, you are requested to fill the Data Subject Rights Request Form (DSRR), available on our website at the following link <https://bfslmauritius.com/privacy-notice/> or send an email to the **DPO**.

10.3. You are required to send your request with all required information, including:

- The request type – For example, are you requesting a copy of your information, the deletion or modification of your personal data; and
- All relevant information which can help to successfully respond to your request.

## 11. Queries and Complaints

11.1. If you have any questions, concerns or complaints about the processing of your personal data, you should contact the **DPO**. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of your personal data in accordance with this Notice and provide you with a timely and appropriate response typically within thirty days. If additional time is required, we will inform you accordingly.

11.2. When contacting the **DPO**, you are requested to provide a clear and detailed description of your concerns. This will help us understand the issue and take appropriate action.

11.3. If you believe that we have not handled your request appropriately, you may submit a complaint to the Data Protection Office of Mauritius.

## 12. Contact Us

12.1. For inquiries or to exercise your data protection rights, contact our **DPO** as follows:

Email: [dpo@bfslmauritius.com](mailto:dpo@bfslmauritius.com)

Phone Number: (+230) 206 2735

Address: Trade & Marketing Centre Building, Mer Rouge, Port Louis, Mauritius.

### **13. Changes to this Notice**

13.1. We may update this notice from time to time to reflect best practices in data management, security and control and to ensure compliance with any changes or amendments made to the **MDPA** and any laws or regulations thereof. The latest version will be made available to you on our website at <https://bfsлмаuritiuѕ.com/privacy-notices/>.