

## Legal notice

### Legal and regulatory information

Centric360 is an organisation providing consultancy services in and from Jersey the United Kingdom and Europe. Centric360 is a business name of Centric 360 Limited, but on this website, it is used generally to refer to Centric 360 Limited.

Centric 360 Limited may be contacted at:

2 Sion Village  
La Grande Route de St Jean  
St John  
Jersey  
JE3 4AT

Tel: +44 7797 751 111

Email: [info@centric360.com](mailto:info@centric360.com)

### Terms of Use and Website Disclaimer

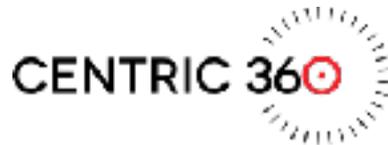
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Centric 360 Limited makes no guarantees or representations as to the accuracy, reliability, or currency of information in this site or the results of its use. Professional advice should be sought before acting or relying upon the information in this site. Links to other sites are provided only to facilitate the easy connection of users to those particular sites.

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1. your use of this website or of its content.
2. any computer virus, bug or other malicious code or software that you may pick up as a result of using this website.
3. your following any link on this website to a third party website or your use of that third party website or of its content.

If you do follow any link on this website to a third party website, we encourage you to review the privacy policy applicable to that site, especially before disclosing any personal information.

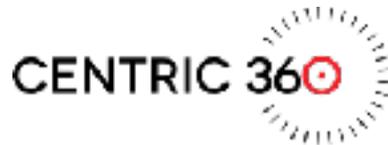
#### Intellectual Property

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means), copied, distributed, used for creating derivative works or used in any other way for commercial or public purposes without Centric 360 Limited prior written consent.

#### Centric 360 Limited Privacy Policy

Centric360 are bound by data protection legislation in each of the various jurisdictions in which it operates ("Applicable Data Protection Law") and we are committed to protecting your privacy. This policy sets out the basis on which Personal Data that Centric360 collect from you, or that you provide to Centric360, will be processed.

The "Centric360" consists of Centric 360 Limited, a company incorporated in Jersey with registered number 11235, whose registered office is at 2 Sion Village, La Grande Route de St Jean, St John, Jersey JE3 4AX

This Privacy Statement is a "privacy notice" for the purposes of Applicable Data Protection Law, and in particular the Data Protection (Jersey) Law 2018 ("DPJ") and the European Unions General Data Protection Regulation (GDPR) 2018, given by Centric360 when acting in its capacity as a data controller in relation to its collection and use of Personal Data.

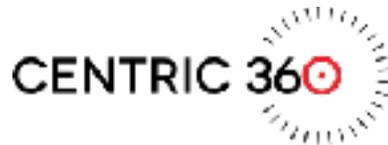
Where Personal Data about you is collected as the result of you engaging with Centric360, Centric360 is the data controller in respect of that Personal Data. Where Personal Data about you is provided by someone, this Privacy Statement will also apply to its collection and use and Centric360 is the data controller in respect of it.

This Privacy Statement does not apply to the collection or use of Personal Data by Centric360 that is a data processor, except to the extent that its terms (or some of them) are incorporated into a relevant processing agreement, either expressly or by reference.

In this Privacy Statement, the phrase "those connected with you" refers to (a) your employees or other people who deal with us on your behalf, whether you are a client that is an individual, a corporate body or some other form of entity or organisation, or an investor in, or an owner of, a client and (b) those people who represent other entities or organisations that we might deal with, such as advisers, regulators, suppliers or anyone else that makes any form of enquiry in relation to us or our services.

Please read this Privacy Statement carefully to understand our practices regarding your Personal Data and how we will treat it.

If you have any queries regarding anything in this Privacy Statement, please contact us at [info@centric360.com](mailto:info@centric360.com).



## Purpose of Data Protection

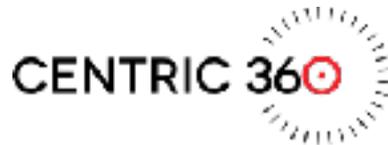
The purpose of data protection legislation is to protect the rights and privacy of individuals ("Data Subjects") in respect of the Processing of Personal Data concerning them. "Personal Data" is any information relating to an identified or identifiable natural person (known as a "data subject"). A person is "identifiable" if he or she can be identified, directly or indirectly, not only by things such as a name or an identification number, but also by things such as location data or some factor specific to (for example) the physical, physiological or social identity of that person. More common examples of Personal Data include names, identification numbers, contact information, identity documents, medical records and photographic images. "Processing" covers any activity involving Personal Data and includes such things as the collection, recording, storage, adaptation, use, disclosure and destruction of Personal Data.

Each member of Centric360 will Process Personal Data in accordance with Applicable Data Protection Law.

## Our Policies

We have policies and procedures that aim to ensure that all our staff, contractors and others that we work with and who Process any Personal Data held by us, or on our behalf, wherever in the world, are aware of, and abide by, their duties under Applicable Data Protection Law. All members of Centric360 abide by standards of data protection that are substantially the same as those set out in the DPJ and GDPR, which requires among other things that Personal Data must be:

1. processed lawfully, fairly and in a transparent manner;
2. collected for lawful purposes that are clearly specified and only further processed for compatible purposes;
3. relevant and limited to what is necessary for the purposes of the processing;
4. accurate and kept up to date, with inaccurate Personal Data being erased or rectified without delay;
5. kept for no longer than is necessary; and
6. processed in a secure manner, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.



Whose Personal Data do we process?

Suppliers (and potential suppliers)

As a potential supplier and then (if applicable) as a supplier, the Personal Data that we Process will include personal and/or professional contact details (addresses, telephone numbers, email addresses), documents and other proofs of standing and reputation and details of bank accounts and/or other payment details.

In addition, if you leave a voicemail message with us, that message may be Processed in a similar manner, and for the same or similar purposes, to email and postal correspondence from or concerning you.

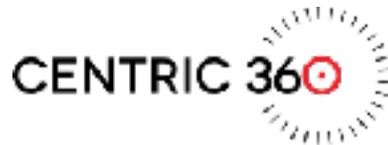
Potential employees

If you are an applicant for a job with us (a potential employee), the Personal Data that we Process about you will include:

1. your name, address and contact details, including telephone numbers and email addresses;
2. details of your qualifications, skills, experience and employment history including notice periods and reasons for leaving and references;
3. information about your current and past levels of remuneration, including entitlement to benefits;
4. whether or not you have a disability that we may need to make adjustments for during the recruitment process;
5. information about your entitlement to reside and/or work in the place where you have applied for a job; and
6. equal opportunity monitoring information, including information about your ethnic origin, sexual orientation, health and religion or beliefs where required by legislation.
7. any other information provided by you on your CV.

If your application for a job with us is unsuccessful, we will retain your Personal Data for a minimum of 6 months after the last point of contact with you (or any recruitment agency through which you have applied to us), but only up until our next clear out of job applicant Personal Information that is no longer required, which takes place biannually at about six month intervals. We will delete any Personal Information no longer required in an appropriate and secure manner.

If your application for a job with us is successful, our retention of your Personal Data will be governed by our separate notice on staff Personal Data referred to as the Employee Privacy



Notice, which will be made available to you by our HR department as part of your becoming an employee.

If you leave a voicemail message with us, that message may be Processed in a similar manner to email and postal correspondence.

Enquirers and visitors to our website

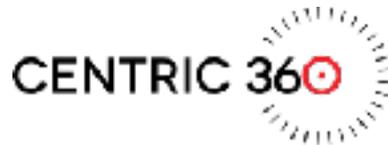
You may give us Personal Data by corresponding with us by email. The Personal Data that we Process will include personal and/or professional contact details (addresses, telephone numbers, email addresses) and, if you leave a voicemail message with us, that message may be Processed in a similar manner to email and postal correspondence. If you have stated contact preferences for service and/or jurisdiction updates and/or events that we may organise or participate in, we will also Process that information.

How we use the Personal Data we Process

Clients (and potential clients)

As a potential client, we will process Personal Data about you and those connected with you, for the purpose of carrying out our business and in order to:

1. respond in our legitimate interests to your enquiries about our services and/or other requests;
2. carry out due diligence or other "know-your-customer", anti-money laundering, counter-terrorist financing or anti-bribery checks in accordance with legal obligations to which we are subject or in our legitimate interests to satisfy our regulatory obligations and our own risk management procedures;
3. conduct checks concerning credit worthiness and standing prior to entering into an agreement with you;
4. take steps in our legitimate interests to prevent, detect or investigate crime, fraud, misconduct or any unlawful action or omission, whether or not relating to your enquiry and whether or not there is any suspicion of any illegality;
5. enter into an agreement with you regarding the provision of services;
6. verify and carry out financial transactions in relation to the provision of the services under the agreement with you;
7. manage our infrastructure and business operations and to comply with policies and procedures that may be required by law or where necessary for our legitimate interest to satisfy other applicable industry regulation, guidelines or notices and/or that may have been put in place by us, including those relating to regulatory review and/or oversight, internal or external auditing, finance and accounting, billing and



collections, IT systems, data and website hosting, training, testing and business continuity; and

8. correspond with you concerning our present and future services and relevant news and service updates with your consent where required by law or otherwise in our legitimate interests provided these interests do not override your right to object to such communications.

If you become a client, we will continue to process Personal Data about you for such of the purposes described above as continue to be relevant. In addition, we will process Personal Data about you and those connected with you regarding the on-going provision of services, as described below. If you do not become a client, we will only keep Personal Data that you have made available to us if it is necessary for us to keep it for legitimate business purposes and/or as we are required to keep it by law or regulation.

If you do become a client, we will need to process Personal Data in order:

under the agreement entered into between you and us to:

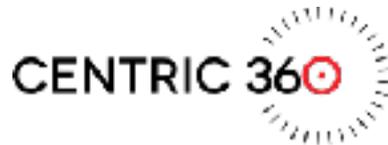
1. provide you with services and to administer and manage our relationship with you;
2. carry out your instructions and to respond to enquiries made by you;
3. conduct and verify ongoing credit worthiness and standing checks relevant to the agreement;
4. recover any fees owed to us under our agreement with you;

under our legal obligations to:

1. carry out on-going due diligence or other "know-your-customer", anti-money laundering, counter-terrorist financing or anti-bribery checks;
2. to comply with other applicable law and regulations in the various jurisdictions in which we operate;

or in our legitimate interests:

1. to manage our infrastructure and business and to further our business interests;
2. to comply with policies and procedures under applicable professional regulation, guidelines or notices and/or that may have been put in place by us, including those relating to regulatory review and/or oversight, risk management, internal or external auditing, finance and accounting, billing and collections, IT systems, data and website hosting, training, testing and business continuity; and
3. other purposes which we may notify you of from time to time, and obtaining your consent where necessary.



## Suppliers (and potential suppliers)

As a potential supplier, we will process Personal Data about you and those connected with you, for the purpose of entering into and receiving services under a contract with you relevant to carrying out our business and in order to:

1. respond to your enquiries about supplying goods or services to us;
2. conduct checks concerning standing and reputation;
3. enter into an agreement with you regarding the provision of services; and
4. correspond with you concerning your present and future goods or services.

If you do become a supplier, we will need to process Personal Data in order to:

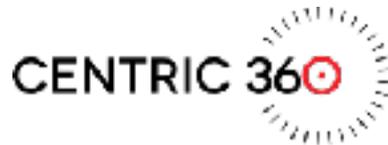
1. administer and manage our relationship with you;
2. respond to enquiries made by you;
3. carry out on-going checks in accordance with legal or regulatory obligations and our own risk management procedures;
4. conduct and verify ongoing standing and reputation checks;
5. pay for goods and services received;
6. comply with legal or regulatory obligations, for example with regard to a regulator's outsourcing policy; and
7. for other purposes which we may notify you of from time to time, and obtaining your consent where necessary.

## Potential employees

If you are an applicant for a job with us (a potential employee), we will process Personal Data about you in order, in our legitimate interests, to assess your application and to advance that application through our recruitment processes, including by making details of your application, including Personal Data, to relevant members of our management and of our HR group, and to comply with policies and procedures under applicable professional regulation, guidelines or notices and/or that may have been put in place by us, relation to staff and recruitment.

## Enquirers and visitors to our website

If you have completed a form on our website, making a new business enquiry or asking a general question, indicating the services and/or jurisdictions then we will process Personal Data about you for the purpose of our legitimate interest in responding to your enquiries and/or request for information.



Likewise, if you have contacted our public relations team by email, either via the website or independently, or otherwise with a media enquiry, we will process Personal Data about you on the same grounds in order to respond to your enquiries and/or request for information.

Further, if you leave a voicemail message with us, that message may be Processed in a similar manner, and for the same or similar purposes, to email and postal correspondence from or concerning you.

If you or someone who works for you has given us a business card at a conference or a business meeting, we will use the contact details on the card in connection with the specific purpose it was provided. Where the card is provided for the specific purpose of requesting our promotional update communications we may first, where permitted by Applicable Data Protection Law, send an email promptly after receiving the business card, to confirm the request, clarify its scope and provide for you to complete contact preferences.

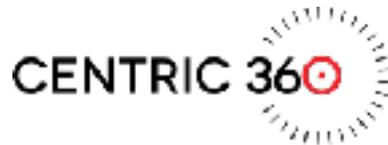
We use information about visitors to our website in our legitimate interests for internal operations, to ensure that content is presented in the most effective manner for you and your computer and to keep our website safe and secure.

#### Centric 360 Limited promotional updates and communications

Where permitted by law or otherwise with your prior consent, we will use Personal Data to provide you with promotional update communications about us or our services, and we may also invite you to tell us what your areas of interest are.

If you are on one of our contact lists for communications from Centric360, you will be able to check and update your contact details, to change your preferences or to "unsubscribe" at any time either by following the links which appear at the end of all our marketing and promotional update communications or by contacting us through our website and we will ensure that your details and preferences or your request to "unsubscribe" are dealt with promptly. Even if you tell us that you do not want to receive marketing or promotional update communications from us, we still may have the right to process Personal Data for the purposes of providing the services and, in such cases, we will continue to process that Personal Data for those purposes.

We do not sell or otherwise pass on your contact details to any third party outside Centric360 for marketing purposes.



Who we share Personal Data with

We may share Personal Data with:

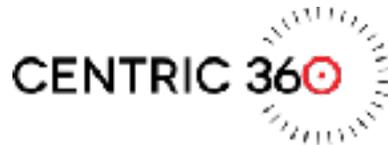
1. business partners, suppliers, affiliates, agents and/or sub-contractors for the performance of any agreement we enter into with you. They may assist us in providing the services we offer, processing transactions, fulfilling requests for information, receiving and sending communications, updating marketing lists, analysing data, providing IT and other support services or in other tasks, from time to time. These third parties will only use your information to the extent necessary to perform their functions.
2. credit reference agencies for the purpose of assessing your credit standing where this is a condition of us entering into a contract with you.
3. If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of supply terms and other agreements with you; or to protect the rights, property, or safety of Centric 360 Limited, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

Security and data retention

We have taken steps to apply appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of Personal Data, and/or the accidental loss or destruction of, or damage to, Personal Data. This includes but is not limited to using properly configured and maintained firewalls and anti-virus /malware protection on servers and PCs with emails scanned for viruses and spam. Our staff have an obligation to ensure that appropriate security measures are implemented at all times in accordance with the guidance set out in our data protection policies and procedures.

Centric 360 Limited has retention policies in place to meet regulatory requirements and client obligations. We retain Personal Data for the duration of the services that we provide as necessary to meet our obligations under our contractual obligations to you, to identify issues or to issue and resolve legal proceedings. We also retain Personal Data beyond the duration of the services that we provide as necessary to meet our legal and regulatory obligations to retain such information under applicable law. We may also retain aggregate information beyond this time for statistical analysis and research purposes and to help us improve our services. Old media (PC and server disks, tapes, etc.) are stored and then destroyed using a reputable specialist organisation.

Retention periods are kept under review. There may be some cases in which we are obliged to delete Personal Data we process, such as the data having been processed in breach of the



Applicable Data Protection Law or to comply with a legal obligation to delete it. In other cases, there may be no specific time limit applicable to the retention of particular Personal Data and, in determining how long particular Personal Data will be retained for, we will use criteria including whether:

- a) the data is no longer necessary for the purpose in relation to which it was collected;
- b) the data can, if required, be collected again without undue delay or difficulty.

We will not, as a general rule, seek or rely on your consent to process Personal Data about you. However, to the extent that we do on occasion rely on your consent in respect of particular Personal Data, we will cease processing that Personal Data by deleting it if you withdraw that consent at any time.

Likewise, where we rely on your consent to process "special category" Personal Data, we will cease processing that "special category" Personal Data by deleting it if you withdraw that consent at any time.

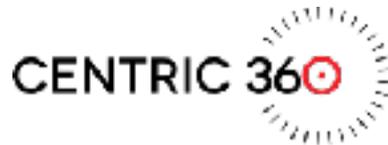
You do have the right to object to the processing of Personal Data by us on the grounds of performance of a legal task or our legitimate interest, but that objection must be on grounds relating to your particular situation. In such circumstance, we will stop processing the Personal Data in question unless:

- a) we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms of the individual; or
- b) the processing is for the establishment, exercise or defence of legal claims.

If you do object to the processing of your Personal Data by us and, as a result, we stop processing it, we may not be able to continue to provide services to you in a particular manner or at all and we may, as a result, need to terminate our service agreement with you.

Where, for example, we process your Personal Data with your consent in order to send you promotional update communications about us or our services, if you withdraw that consent, we will not be able to send you such communications.

If, as an unsuccessful job applicant you ask us to retain your Personal Data being the 6-month period for which we would normally retain it, but you later change your mind and ask us to delete it, we will not be able to refer to your original application should a potentially suitable vacancy subsequently occur.



We will delete any Personal Data no longer required, and will do so in an appropriate and secure manner.

#### Data Location

Centric 360 Limited stores data in Jersey.

In the case of transfers of Personal Data to third parties that are located in a country that is not subject to an adequacy decision by the European Commission, we will only transfer your Personal Data to third parties that have been approved for use by Centric360 following due diligence and, in each case, provided that such third parties are the subject of contractual arrangements with us imposing, among other things, obligations on the third party to ensure that appropriate technical and organisational measures are implemented by it at all times to prevent the unauthorised or unlawful processing of Personal Data, and/or the accidental loss or destruction of, or damage to, Personal Data, again consistent with the obligations set out in the European Commission-approved standard contractual clauses.

#### Your rights

You have a number of rights under DPJ in relation to your Personal Data.

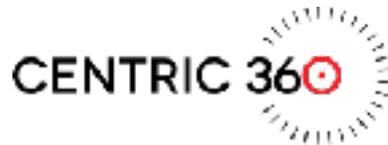
You have the right under certain circumstances to:

1. have access to your Personal Data by making a "subject access request";
2. have your Personal Data corrected if it is wrong or, in certain circumstances, to have it deleted;
3. have the processing of your Personal Data restricted (while we verify or investigate your concerns with this information for example);
4. object to the further processing in certain circumstances of your Personal Data including the right to object to marketing;
5. request we move your provided Personal Data elsewhere (data portability);
6. to withdraw any consent that you have given us if we are processing your Personal Data only because you have given that consent; and
7. not have your Personal Data automatically processed.

#### Centric 360 Limited contact details

If:

1. you wish to exercise any of your rights in relation to your Personal Data;
2. you have any complaint about the way in which we process Personal Data; or



3. you require any further information about this Privacy Statement or its contents, please contact us in the first instance at: Centric 360 Limited, 2 Sion Village, La Grand Route de St Jean, St John, Jersey JE3 4AX, Tel: +44 7797 751 111; Email: [info@centric360.com](mailto:info@centric360.com)

#### Data protection regulator contact details

If your request or concern is not satisfactorily resolved by us you may approach your local data protection data protection authority in the jurisdiction in which we provide services to you.

The contact details for the data protection regulators in the jurisdictions in which we operate are as follow:

- Jersey: Office of the Information Commissioner, Brunel House, Old Street, St Helier, Jersey JE2 3RG. Tel: +44 (0)1534 716530. Email: [enquiries@dataci.org](mailto:enquiries@dataci.org)

#### Updates

We review our policies and procedures regularly and we reserve the right to amend the terms of this Privacy Statement from time to time at our absolute discretion. Any amended Privacy Statement will be posted on our website and you are encouraged to visit our website from time to time to ensure that you are aware of our latest policies in relation to the protection of Personal Data.

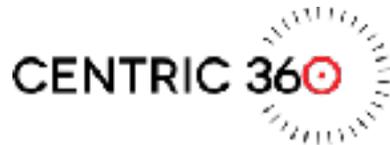
#### Cookies

We contain no Cookies.

#### E-mail

E-mail and any attachments are confidential and may also be privileged. They are intended solely for the addressee(s). If you are not the intended recipient of an e-mail, please delete it and notify Centric 360 Limited immediately by telephoning or e-mailing the sender. If you are not the intended recipient, you must not copy or use the content of an e-mail and/or its attachment(s) for any purpose or disclose its contents to any other person. Any unauthorised use of the content of an e-mail and/or its attachment(s) is prohibited and may be unlawful.

All statements of opinion or advice addressed to a Centric 360 Limited client contained in an e-mail and/or its attachment(s) are subject to the terms and conditions of the engagement between Centric 360 Limited and that client.



Centric 360 Limited does not accept responsibility for the accuracy, completeness or delivery of e-mail. Communication by e-mail is not totally secure. Please notify the sender immediately if you suspect that any e-mail may have been intercepted or amended. No responsibility is accepted for any statements, views or opinions expressed by the sender where an e-mail is a non-business e-mail. If Centric 360 Limited receives a request from you via e-mail Centric 360 Limited will treat that as authority to reply by e-mail.

While Centric 360 Limited scans all e-mail and attachments for viruses, Centric 360 Limited does not guarantee that either is virus-free and accept no responsibility for any computer virus, bug or other malicious code or software or damage caused by any of the foregoing that might be transferred by or picked-up from e-mail.

#### **Applicable Law**

This website is subject to the law of Jersey, Channel Islands and the jurisdiction of the Jersey courts.

Any communication with this website shall be deemed to have taken place in Jersey, Channel Islands, irrespective of where you, or any other user on your behalf, may be located.