

# **PRIVACY POLICY**

## **SHIBANI FINANCE CO LTD ("Shibani Finance")**

### **1. Purpose**

- 1.1. Your privacy is important to us. Shibani Finance respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the principles relating to the processing of personal data established by the Mauritian **Data Protection Act 2017** (the "**Act**").
- 1.2. This policy sets out how we collect and treat your personal data and applies whenever you deal with Shibani Finance, visit our website, or in any other instance where you provide us with any personal data. It also provides general information about your privacy rights when your personal data is obtained from you or with your consent, through a third party or entity.
- 1.3. "Personal data" means information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

### **2. Collection of personal data**

- 2.1 Shibani Finance will, from time to time, receive and store personal data when you visit our website, provide to us directly or give to us in other forms.
- 2.2 You may provide basic information such as your name, phone number, address and email address to enable us to send you information, provide updates and process your data.
- 2.3 Additionally, we may also collect any other data you provide while interacting with us. When you apply, enquire or obtain one of our services, you consent to us collecting, maintaining, using and disclosing personal data about you and provided by you or by another person.

### **3. How we collect your personal information**

- 3.1 Shibani Finance collects personal data from you in a variety of ways, including when you access our website and when we provide our services to you. We may receive personal data from third parties. If we do, we will manage it as set out in this policy.
- 3.2 We may collect personal information about you that is publicly available, for example from public registers or social media, or made available by third parties.

### **4. Use of your personal information**

- 4.1 Shibani Finance may use personal data collected from you to provide you with information, updates and our services. We may also make you aware of new and additional services, and opportunities available to you. We may use your personal data to improve our services and better understand your needs.
- 4.2 Shibani Finance may contact you by a variety of measures including, but not limited to telephone, email or sms. Specific information about how we use your personal data may be disclosed in other documents provided to you.

### **5. Disclosure of your personal data**

- 5.1 We may disclose your personal data to any of our employees or officers, as reasonably necessary for the purposes set out in this policy. Personal data is only supplied to a third party when it is required for the delivery of our services.
- 5.2 We may from time to time need to disclose personal data to comply with a legal requirement, such as a law, regulation, court order, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.
- 5.3 We may also use your personal data to protect the copyright, trademarks, legal rights, property or safety of Shibani Finance, its customers or third parties.
- 5.4 By providing us with personal data, you consent to the terms of this policy and the types of disclosure covered by this policy. Where we

disclose your personal data to third parties, we will request that the third party follow this policy regarding the handling of your personal data.

## **6. Dealing with unsolicited personal data**

- 6.1 In the event that we receive personal data which we did not solicit, such information will be assessed to determine whether we could have collected that information through our dealings with you or through the consent you have provided us. If we reasonably determine that we could not have collected that personal data, we will immediately destroy or de-identify that personal data if it is lawful to do so.

## **7. Special categories of personal data**

- 7.1 The Act also protects certain types of personal data which are termed “special categories of personal data”. We do not actively seek to collect “special categories of personal data”, unless it is necessary for our business purposes or required by law. If we need to obtain this type of information, we will ask for your consent, except where otherwise permitted by law.
- 7.2 “Special categories of personal data” means: data or an opinion about an individual’s: racial or ethnic origin; political opinion or adherence; religious or philosophical beliefs; membership of a trade union; physical or mental health or condition; sexual orientation, practices or preferences; genetic data or biometric data uniquely identifying someone; the commission or alleged commission of an offence; any proceedings for an offence committed or alleged to have been committed, the disposal of such proceedings or the sentence of any Court in the proceedings; or such other personal data as the Data Protection Commissioner may determine to be sensitive personal data.

## **8. Overseas Disclosure**

- 8.1 Data that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Mauritius.

- 8.2 For any personal data transmitted overseas or disclosed to an entity which is controlled overseas, we make sure that appropriate data handling and security arrangements are in place.

## **9. Security of your personal data**

- 9.1 Shibani Finance is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 9.2 We will take all reasonable steps to destroy or permanently de-identify personal data if it is no longer needed for the purposes of providing our services to you and where we are not required to retain that information by law.

## **10. Access to your personal information**

- 10.1 You may request details of personal data that we hold about you in accordance with the provisions of the Act. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at [ashraf@shibanifinance.mu](mailto:ashraf@shibanifinance.mu).
- 10.2 We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances. If we do not provide the information you have requested, we will advise you of the reason in writing – this may be due to disclosure being unlawful, against public policy or if the information jeopardises the confidentiality of our security or commercial information.

## **11. Changing or updating your personal information**

- 11.1 You should contact us if you wish to change or update your personal data held by us. Prior to making the change, we may ask you to provide us with documentary evidence substantiating the change. In some instances, the change may be due to a mistake by us or a third

party. We will advise you once the correction is made or if we cannot correct your information, we will advise you as to the reasons why.

## **12. Complaints about privacy**

12.1 If you have any complaints about our privacy practices, please feel free to send in details of your complaints to us at [complaints@shibanifinance.mu](mailto:complaints@shibanifinance.mu). We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

12.2 A complaint should identify whether it is about:

the collection of personal data;

the use of personal data;

the disclosure of personal data;

the security or storage of personal data;

the accuracy of personal data;

a refusal to give complaint access to or find out about their personal data; or

a refusal to change or delete personal data .

12.3 If we do not resolve your dispute within thirty (30) days, we will advise you why and when we expect for your data to be corrected. We will also seek your written consent to give us more time and advise you that you may wish to lodge a complaint with the Mauritian Data Protection Office to address the issue.

12.4 Our contact details are as follows:

Shibani Finance Co Ltd  
5<sup>th</sup> Floor Shehnaz Tower  
30, Louis Pasteur Street  
Port-Louis

Phone : +230 203 7777

Fax : +230 213 2656

E-mail : [info@shibanifinance.mu](mailto:info@shibanifinance.mu)

Website : <http://www.shibanifinance.com>

### **13. Changes to Privacy policy**

- 13.1 Please be aware that we may change this policy in the future. We may modify this policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our policy.

### **14. Website**

#### **14.1 *Cookies***

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website. Where any data we collect through cookies qualifies as personal data, our Privacy Policy applies to the collection and use of that data.