

Privacy Policy

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1. Responsibility

This Privacy Policy is provided by “**Rafinad LLC**”, “**we**”, “**us**”, “**our**”), for and on behalf of itself. This Data Protection Policy will be augmented by jurisdictional specific addendums from time to time.

We are committed to safeguarding the privacy of the personal information that we process in the course of our business, including the personal information we receive from you (“**you**” or “**your**”). This Privacy Policy describes how and why we collect, store and use personal information, and provides information about the rights of the individuals to whom such personal information relates.

For the purposes of applicable data protection law, Rafinad LLC is typically the “data controller” of any personal information provided to us. Very occasionally, we will act on specific retainers as a “processor” (meaning that we process personal data only in accordance with the directions of a data controller, or as otherwise permitted by law).

Please read the following information carefully to understand our views and practices regarding how we handle personal information. If you have any queries about our approach to data protection that are not already addressed in this Privacy Policy, please contact us, as per the contact details set out on the website <https://rafinad.io/en/>

2. Collection of Personal Information

We may collect personal information from you in the course of our business, when you contact us or request information from us, when you instruct us to provide services, when you use our website or mobile app (or other platforms, if applicable), when you are a Publisher (webmaster/service provider) or Advertiser, or as a result of your relationship with any of our personnel or clients.

The personal information that we process includes:

- Basic details, such as your name, role/title, employer/s, your relationship to a person, and your contact information (such as your email address, physical address, contact numbers);
- Identification information to enable us to check and verify your identity (e.g. your birthdate; your passport details), and information collected from publicly available resources to verify the same;
- Information relating to the matter on which you are seeking our services;

- Bank account or other financial information, if relevant to our engagement with you;
- Technical information (including your location, IP address, browser details, traffic data, location data), such as information from your visits to our website or mobile app (page interaction information, length of visits, etc.), or in relation to marketing emails we send to you;
- Information relating to your visits to our offices or our meetings and events, including appointment details (e.g. time, location, participants), CCTV images and other photographic or video images;
- Personal information provided to us by or on behalf of our clients, or generated by us in the course of providing services to them, which may include special categories of personal data;
- Any other information relating to you which you may provide to us.

We may collect your personal information:

- As part of our new business intake and client on-boarding or client maintenance activities, and when you seek services from us;
- When you seek employment from us, as part of our new employee on-boarding and maintenance of the employment relationship, or when you engage with our alumni group;
- When you provide (or offer to provide) services to us, either yourself or on behalf of your employer;
- When we are acting on a matter where you or your employer are a party to the same;
- When you interact with our website or mobile app, or use any of our online services;
- When you interact with us in respect of any of our marketing communications or events;

We collect most of this information directly from you, or through your use of our website.

The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with our professional obligations and applicable law. We have arrangements in place with personnel and service providers who may process your personal information, to ensure that confidentiality is maintained.

3. Purposes

Whether we receive your personal data directly from you or from a third party, we will only use your personal information if we have obtained your consent (where necessary), or if we have another lawful basis upon which to do so (e.g. for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into such contract; for compliance with a legal obligation on us; to protect your vital interests or those of another natural person; or for our own legitimate interests, or those of a third party, except where such interests are overridden by your own rights or interests).

The purposes for which we process your personal information are as follows:

- Providing services to you as well as getting services rendering by you;
- Communicating with you in respect of our developments and the promotion of our marketing-services practice;
- Managing our business relationship with you (or your organization), whether in connection with the provision of our services, the procurement of your goods and services, or as your employer (or potential or former employer), including processing payments, accounting, auditing, billing and collection and related support services;
- Complying with our legal obligations, including with respect to legal and regulatory considerations (e.g. anti-money laundering and sanctions checks, audits, enquiries by regulatory authorities);
- Managing and securing access to our premises and information technology systems, and monitoring the technology side of our operations;

- Keeping your contact details accurate and current using information provided by you, or information publicly available;
- For any purpose related and/or ancillary to any of the above or any other purposes for which your personal data was provided to us.

4. Cookies

Cookies are small files that are sent to a computer's hard drive by a web server, enabling a website to remember who you are. Information from cookies may include information relating to your use of our websites, information about your computer (such as IP address and browser type), and demographic data. Please, be sure, that We do not use cookies neither do we use cookies for the usage of the third-party websites. If we start using cookies, we will let you know by placing the Cookie banner, so you could have the right to make your cookie-choice.

For more information on how we may change this Policy, please, read below the article 9 "Changes to this Privacy Policy".

5. Sharing your Personal Information

We may disclose your personal information to a recipient (i) for the purposes of outsourcing one or more of the purposes-related functions described above; (ii) to confirm or update information provided by you; (iii) to inform you of events, information about our services, and other important information, or (iv) for other purposes disclosed at or before the time the information is collected. If we re-organise our business, we may need to transfer your personal information to other group entities or to third parties.

Additionally, we may process contact details and attendance data in the interests of public health efforts to help tackle COVID-19.

In relation to any other disclosures to third parties as necessary to provide the services as effectively as we can (for example but not limited to our professional advisors as such as lawyers and accountants, government or regulatory authorities, professional indemnity insurers, tax authorities, document processing and transaction services, corporate registries, counsel, arbitrators, mediators, clerks, witnesses, experts, third party postal and courier services), we will only do so where you have given your consent, where we are required to do so by law, or where it is necessary for the purpose of or in connection with legal proceedings or in order to exercise or defend legal rights.

We do not sell, rent, distribute, or otherwise make personal information commercially available to any third party.

6. How long we keep your Personal Information

We will retain your personal information for the length of time needed to fulfil the purposes for which it was collected, unless we specifically agree a longer retention period with you, or a longer retention period is required or permitted by law.

7. Your Rights

Various rights may be available to you, depending on the circumstances and the applicable law. We summarize key rights likely to be available to most data subjects:

- **Withdraw consent:** When personal information is processed on the basis of consent, you may withdraw consent at any time, although such withdrawal will not affect the lawfulness of processing occurring prior to such withdrawal;
- **Access and rectification, etc.:** You may request access to and rectification or erasure of personal information, or restriction of Processing concerning the Data Subject or to object to Processing as well as the right to data portability;

- **Objecting and restricting:** You may object, on legitimate grounds, to the processing of your personal information, or request that processing be restricted; and
- **Complaints:** If you believe that your data protection rights may have been breached, you may lodge a complaint with the relevant data protection authority.

If you would like to exercise any of the above rights, or any other rights available to you pursuant to applicable law, please contact us using the contact details set out on the website <https://rafinad.io/en/> .

8. Information Security

We have implemented reasonable administrative, technical and physical measures to protect your personal information against loss, misuse and alteration.

9. Changes to this Privacy Policy

We may from time to time make changes to this Privacy Policy. Where these are likely to be material, we will communicate these in advance. Otherwise, these will become effective once the amended Privacy Policy is posted on our website. Please check back regularly to keep informed of updates to this Privacy Policy.

Last updated: July 2023