Privacy policy

1. Introduction

Moonance LLC (hereafter "the Company", "We", "Us") take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal information. By providing us with your personal information and using our services, you are accepting and consenting to the practices described in this policy. It also explains your rights in relation to your personal information and how to contact us or the supervisory authority in the event you have a complaint. We collect, use and process certain personal information about you. When we do so we are subject to the EU General Data Protection Regulation 2016/679 (hereafter "GDPR") and we are responsible as 'Controller' of that personal information for the purposes of the Regulation.

2. Definitions

It would be helpful to start by explaining some key terms used in this policy:

Personal information:

– Any information relating to an identified or identifiable individual Special categories of personal information:

– Personal information revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data. Data concerning health, sex life or sexual orientation.

3. Information we collect about you

We will collect and process the following data about you:

• **Information you give us:** The information about you that you give us by filling our client forms/agreements, or by corresponding with us by phone, e-mail, in person or otherwise. It includes information you provide when you choose to use our services and/or become an affiliate to our company, participate in any company event and when you send any information to us under any capacity. The information you give us may include your name, address, e-mail address and phone number, financial information etc. When you visit our website(s) we collect information about your visit, including the full Uniform Resource Locators (URL).

• **Information we collect/receive from other sources:** This is information we receive about you if you use any of the websites we operate or the services we provide and/or from other affiliates and/or professionals. We are working closely with third parties (including, for example, business partners, brokers, payment service providers, analytics providers, search information providers, credit reference agencies). We will notify you when we receive information about you from them and the purposes for which we intend to use that information.4

4. How we use your data you

We use the information we collect about you in the following ways.

– To carry out our obligations arising from any agreements and/or contracts between you and us and to provide you with the information, products and services that you request from us.

– For our legitimate interests or those of a third party, for example, to prevent and detect fraud/unauthorized access to our systems that can be damaging to us and you and/or to be as efficient as we can so we can deliver the best service to you at the best price and/or conducting credit reference checks via external credit reference agencies to ensure our customers are likely to be able to pay for our products and services.

– To comply with our legal and regulatory obligations, for example, conducting checks to identify our customers and verify their identity as required by "The Prevention and Suppression of Money Laundering and Terrorist Financing Law Of 2007".

– To provide you with information about other services we offer that are similar to those that you have already used or enquired about.

– To notify you about changes to our services.

– Clients' feedback is pivotal to our commitment to professional excellence. Therefore, we may request you to provide your feedback on any of our services or products you have received through reputable online customer review websites. Your feedback may be shared for promotional and marketing purposes.

5. Disclosure of your information

You agree that we have the right to share your information with:

– Any member of our group and its subsidiaries, as defined under the St. Vincent and the Grenadines Companies' Law.

– Selected third parties we use to help deliver our products and/or services to you including:

● business partners, brokers, vendors, insurers, payment service providers for the performance of any contract we enter into with them or you.

● analytics and search engine providers that assist us in the improvement and optimization of our site.

● credit reference agencies and/or banking and financial institutions and/or auditors for, among others, the purpose of assessing your credit score (where this is a condition of us entering into a contract with you).

– Law enforcement agencies and regulatory bodies and/or the Police for the purposes of complying with local and international regulations against money- laundering, fraud and the general prevention of crime and illegal activities We will disclose your personal information to third parties:

● In the event that this is necessary for the delivery of our products and/or services to you.

● If Moonance LLC or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.

● If we are under a duty to disclose or share your personal data to comply with any legal and/or regulatory obligation, or to enforce or apply our terms of use and other agreements, or to protect the rights, property, or safety of Moonance LLC, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection, anti-money laundering and credit risk reduction.We only allow the third parties we work with to process your personal information if we are satisfied they take appropriate technical and

organizational measures to protect your personal information. We also impose contractual obligations on our selected third parties to ensure they can only use your personal information to provide services to us and to you.

6. Where we store your personal data

All information you provide to us is stored on secure servers. Where we may have given you (or where you have chosen) a password which enables you to access certain parts of our site and/or use any other of our services, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to us; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

7. Duration your personal information will be kept

We will keep your personal information while you have an account with us or while we are providing services and/or products to you or while we are in a contractual relationship with you. Thereafter, we will keep your personal information for as long as is necessary:

● to respond to any questions, complaints or claims made by you or on your behalf.

● to show that we treated you fairly.

● to keep records required by law, regulations and regulatory authorities.

We will not retain your personal information for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of personal information. When it is no longer necessary to retain your personal information, we will delete or anonymize it.

8. Transferring your personal information outside the EEA

It is sometimes necessary for us to share and/or store your personal information outside the EEA, for example:

● With any member of our group and/or subsidiaries located outside the EU.

● with your and our service providers located outside the EEA.

These transfers are subject to special rules under GDPR, as non-EEA countries do not have the same data protection laws as Member States of the EEA. We will, however, ensure that those transfers comply with the GDPR and that all of your personal information will be secure. Unless the individual has specifically consented to the transfer, we will only transfer personal data outside the EEA where:

● we transfer the data to a country or international organization which the EU Commission has decided ensures an adequate level of protection for your personal data.

● The transfer of your personal data is subject to adequate safeguards, which may include binding corporate rules, data processing agreements or standard data protection clauses adopted by the EU Commission; or

● one of the derogations in the GDPR to transfer personal data outside the EEA applies.

If you would like further information please contact our DPO.

9. Your rights

You have the following rights, which you can exercise:

Access The right to be provided with a copy of your personal information.

Rectification The right to require us to correct any mistakes in your personal information.

To be forgotten The right to require us to delete your personal information—in certain situations.

Restriction of processing The right to require us to restrict processing of your personal information—in certain circumstances, for example, if you contest the accuracy of the data.

Data portability The right to receive the personal information you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations.

To object The right to object:

– At any time to your personal information being processed for direct marketing (including profiling).

– In certain other situations to our continued processing of your personal information, for example, processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision-making The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.

Moreover, if the data subject has provided his/her consent to any of the processing of his/her personal data, he/she has the right to withdraw his/her consent to that processing at any time, where relevant. He/she must contact the DPO if he/she wishes to do so.

We aim to comply with requests of data subjects as quickly as possible and will ensure that we comply with legislation, unless exceptions apply. In such cases, the reasons for any delay will be explained in writing to the data subject making the request.

In processing a request, the identity of the data subject needs to be verified before information will be released. No personal data will be disclosed to a third party without the written consent of the data subject.

We reserve the right to refuse repeated/vexatious requests. For further information on each of those rights, including the circumstances in which they apply, please contact our DPO.

10. Keeping your personal information secure

We have appropriate technical and organizational security measures to prevent personal information from being accidentally lost, used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breaches. We will notify you and the relevant supervisory authority of a suspected data security breach when we are legally required to do so.

11. How to complain

We hope that we and our DPO can resolve any concern or complaint you may have about our use of your information.

The GDPR also gives you the right to lodge a complaint with a supervisory authority.

12. Changes to this privacy policy

This privacy policy was last updated on 20/05/2022.

We are constantly reviewing how we process and protect data. Therefore, changes to our privacy policy may occur at any time. We will endeavor to publish any changes.

13. How to contact us

Please contact our DPO by email if you have any questions about this privacy policy or the information we hold about you.

Our DPO's contact details:
Email: dpo@moonance.com