

ALDREX SUPPLIERS LTD (BUSINESS REGISTRATION NUMBER C06019377)

1. Introduction

Welcome to the Privacy Notice of Aldrex Suppliers Ltd which applies to all its customers, staff, partners, potential customers, employees and representatives. Being established in Mauritius, we may offer services to suppliers based within the European Economic Area (EEA) as a result of which compliance with the General Data Protection Regulation ((EU) 2016/679)(GDPR) and data protection legislation may be required. The following information explains how we process your personal data in the provision of our services.

2. Glossary

Controller: means a person who or public body which, alone or jointly with others, determines the purposes and means of the processing of personal data and has decision making power with respect to the processing.

Personal data: means any information relating to a data subject.

Data Subject: means an identified or identifiable individual, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

Processor: means a person who, or public body which, processes personal data on behalf of a controller.

Recipient: means a person to whom, or a public body to which, personal data are disclosed, whether a third party or not.

Third Party: means a person or public body other than a data subject, a controller, a processor or a person who, under the direct authority of a controller or processor, who or which is authorised to process personal data.

Restriction of processing: means the marking of stored personal data with the aim of limiting their processing in the future.

Processing: means an operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Profiling: means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to an individual, in

particular to analyse or predict aspects concerning that individual's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Consent: means any freely given specific, informed and unambiguous indication of the wishes of a data subject, either by a statement or a clear affirmative action, by which he signifies his agreement to personal data relating to him/her being processed.

Purpose of this Privacy Notice

This Privacy Notice provides you with information on how the Company collects and processes your personal data, including any data you may provide through the website or via any other means (such as over the phone), when you provide your details to obtain our magazines, when you take part in a competition or register as a member of our loyalty programme etc.

The Company processes personal data for its legitimate business interest to send relevant commercial communications. Without your data, we will not be able to provide you access to the services.

It is important that you read this Privacy Notice together with any other Privacy Notice or fair processing notice we may provide you on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

3. Controller

Aldrex Suppliers Ltd (collectively referred to as "The Company", "we", "our", "us" in this privacy policy), with its registered office at Corner Baissac and Victoria Avenues, Quatre Bornes, Mauritius, is the controller and responsible for your personal data.

The Company has appointed a Data and Compliance Officer who is responsible to oversee questions in relation to this policy. If you have any questions about this Privacy Notice, including any request to exercise **YOUR LEGAL RIGHTS**, please contact the Data and Compliance Officer using the details set out below.

Our full contact details are

- Email address :dataprotection@aldrex.mu
- Postal address : Aldrex Suppliers Ltd, Corner Baissac and Victoria Avenues, Quatre Bornes, Mauritius

In case you have any complaint at any time, as your first point of contact, please contact us for your concerns and we will revert back to you as soon as possible in order to come to a

solution. However, nothing prevents you from contacting the supervisory authority responsible for Data Protection in Mauritius which is the Data Protection Office.

4. Changes to the Privacy Notice and your duty to inform us of changes

The data we keep about you is always required to be accurate and current. In case of any change in your personal data, we request you to inform us of the same as soon as possible.

5. Collection of Data

Personal data, or personal information, means any information about an individual from which an individual can be identified. It does not include data where the identity has been removed (anonymous data). We may collect, use store and transfer different kinds of personal data about you relevant to our business relations and some of them include but is not limited to identity data, contact data, transaction data, technical data, profile data, usage data, marketing and communication data.

We may also collect, use and share Aggregated data such as statistical data for any purpose. Aggregated data may be derived from your personal data but is not considered as personal data in law as the data does not reveal your identity. For instance, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we will treat the combined data as personal data, which will be used in accordance with this Privacy Notice.

6. Risk of failing to provide personal data

Where we need to collect personal data by laws or under the terms of an Agreement we have with you and if you fail to provide the data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

8. Automated technologies or interactions

As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns.

We collect this Personal Data by using cookies and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

We can also collect contact and identity data through our website or Facebook pages.

9. Use of personal data

We will use your personal data only when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you for the provision of our services.
- Where it is necessary for our legitimate interest (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory requirement.

Generally, we do not rely on consent as a legal basis for processing your personal data. However, you have the right to withdraw consent to marketing at any time by getting in touch with the Company.

10. Purposes for which we will use your personal data

The rationale of using your personal data are amongst others for the following reasons:

- To make recommendations and suggestions to you about our products that may be of your interest;
- To use analytics to improve our website, products/services, marketing, customer relationships and experiences;
- To administer and protect our business and this website
- To enable you to participate in a survey, competition, lucky draw;
- To manage our relationship with you which will include, notifying you about changes to our terms or privacy policy, requesting that you leave a review or take a survey, to provide you with customer support service, including dealing with any complaint you may have;
- To register you as a new loyalty customer or as a sales representative
- To send email and text marketing communication or notifications in case you have not opted out of receiving any marketing communications.

11. Opting Out

In case you decide to stop receiving our marketing messages at any time, you may opt out from the links available or by contacting us at any time. Where you opt out of receiving these marketing messages, this will not apply to personal data that you have provided to the Company to avail yourself of its services.

12. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

13. Change of purpose

We will only use your personal data for the purpose for which we collected it, unless we reasonable consider that we need to use it for another reason and that reason is compatible with the original purpose. Should you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please email us.

If we need to use your personal data for an unrelated purpose, we shall notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

14. Disclosure of your personal data

We may have to share your personal data with third parties for legal requirements. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Where we transfer your data to third parties outside Mauritius, in relation to your services, this may be necessary for the fulfilment of our contract with you. Where we are unable to rely on one of the safeguards outlined below when transferring data to those suppliers outside Mauritius and we will rely on the derogation under Article 49 of the GDPR and data protection legislation as may be applicable in order to protect personal data to countries outside the European Union Countries (as the transfer relates to the performance of a contract of a contract for your benefit), and you hereby permit us to do so.

You also acknowledge that when your personal data is transferred outside Mauritius and the European Union Countries, controls on data protection may not be as wide as the legal requirements within Mauritius or the European Union Countries.

For all other transfers of data, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented.

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by in accordance with the requirements of the European Commission which give personal data the same protection it has in Europe.

15. Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

16. Data Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means and the applicable legal requirements. In addition to the above, by law we have to keep basic information about our customers, suppliers/partners, employees (including Contact, Identity and Transaction data) for ten years after they cease being customers for tax and legal purposes.

In some circumstances, you can ask us to delete your data or we may anonymise your personal data so that it can no longer be associated with you for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Under certain circumstances, you have rights under the data protection laws in relation to your personal data.

17. Request for personal data

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We shall try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

18. Your Legal Rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - a) if you want us to establish the data's accuracy;
 - b) where our use of the data is unlawful but you do not want us to erase it;
 - c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer: of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used,

machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

- Withdraw consent at any time: where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- Right to complain to the authorities: data subjects shall have the right to withdraw his or her consent to the processing of his or her personal data at any time and may direct his/her complaint to the relevant authority.

19. Applicable Law

This notice will be governed by and interpreted according to the Laws of Mauritius. All disputes arising under the notice will be subject to the exclusive jurisdiction of the Courts of Mauritius.

20. Changes to this Notice

The Company operates in a dynamic business environment and we may be required to review and revise our policies. As a result, we reserve the right to change this privacy policy at any time and notify you by posting an updated version of the policy on this website.