



SUNTERA  
GLOBAL

Suntera Global

# Privacy Notice (Clients)

18 September 2023

EMPOWERING  
RESPONSIBLE  
AMBITION

[suntera.com](https://suntera.com)

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## Introduction

This Privacy Notice (the “Notice”) explains what Personal Data the Suntera Global group of companies (“Suntera”, “we”, “us”) will collect from you and how we will use that personal information during the course of our providing Services to you. We are committed to being transparent with you regarding our use of your personal information and encourage you to contact us on our contact details provided below, should you have any concerns.

Your Personal Data is collected, retained and processed in accordance with the requirements of the European General Data Protection Regulation as applied in our various operating jurisdictions (“DP Laws”). For the purposes of DP Laws the ultimate Data Controller is Suntera Group Limited, a company incorporated in the Isle of Man with registered office address Peveril Buildings, Peveril Square, Douglas, Isle of Man, IM99 1RZ. Suntera Group Limited is registered with the Isle of Man Information Commissioner under registration number R001070. Your day-to-day Data Controller is also the Suntera Entity with which you contract for our Services.

## Why we collect personal data

We will obtain and process your Personal Data to:

- Supply the services as per your client service agreement;
- Comply with our regulatory and legal obligations including “know your customer” due diligence requirements and risk assessments;
- Provide customer support service and administration;
- Provide accounting related services;
- Provide data storage facilities;
- Assist us in developing new and improved products
- Provide you with information regarding our products and services that you request or we feel may interest you, where you have consented to be contacted for such purpose;
- Report any crime, or suspected crime, including money laundering or fraud;
- To fulfil any client obligations that may arise as part of your client service agreement.

## Legal basis for processing

For each of the abovementioned purposes Suntera processes your personal data on the following legal grounds:

- Your consent – for marketing purposes only when you gave it separately;
- To carry out our obligations arising from any contracts entered into between you and us (in particular but not limited to your client service agreement); and
- General legal and compliance obligations derived from Suntera providing regulated services.

Suntera is committed to ensuring that the Data Subject’s privacy is protected. Should Suntera ask the Client or any related parties to provide certain information by which they can be identified when utilising our services, the Client (and related parties) can be assured that information will only be used in accordance with this Notice.

## Security

Suntera is committed to ensuring that Data Subjects information is secure. Any data collected is stored in a secure and protected environment and is correct as it is provided.

We protect your data by:

- Offering you a secure transmission method to send us personal or company information; and
- Implementing security policies and technical measures to protect data from unauthorised or improper access, use of disclosure.

All staff under-go applicable data protection training and are aware of their obligations under the GDPR.

## Accuracy of data

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information is used. Records are usually amended as soon as possible and within 7 days of receipt of any update from you. Information on our retention schedule may be provided on request. Should you note a discrepancy in the information that we hold on you, please contact your Suntera representative or the Data Protection Officer as outlined below.

## Opting in and out of Promotional Communications

By agreeing to this Notice, and only where you have provided your express consent, we may from time to time send you promotional communications in respect of services offered by the wider Suntera Group of companies which we feel may be of interest to you. If at any time you wish to opt-out, you can do so by e-mailing the Group's Data Protection Officer or by clicking the unsubscribe link on the respective email communication.

## Disclosing to Third Parties

We share your Personal Data to our wider Suntera Global group of companies who are also required to comply with the DP Laws. In accordance with this Notice and DP Laws, you understand and agree that we may disclose your personal information to appropriate third parties for the following purposes:

- In the event that we sell or buy any business, in which case we may disclose your personal data to the prospective seller or buyer of such business or asset; or
- If we or substantially all of our assets are acquired by a third party, in which case personal data held about our customers will be one of the transferred assets; or
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation including but not limited to, verifying information you have provided to us; or
- In order to enforce or apply the terms of this Notice or any other agreements; or
- To protect the rights, property or safety of us, our customers or others; or
- Where we have received your permission for us to do so.

## International Transfers of Personal Data

It may in certain circumstance be illegal to transfer any personal data outside the EEA or approved adequate jurisdictions. When we transfer any part of your personal data outside the EEA or adequate jurisdictions, we

will take reasonable steps to ensure that it is treated as securely as it is within the EEA or adequate jurisdictions. These steps include but are not limited to the following levels of protection:

- The EU approved Standard contract clauses; or
- Any other method deemed appropriate by the applicable DP Laws.

For the avoidance of doubt, we only transfer your personal data within our wider group of companies who are subjected to the DP Laws. Any further international transfers will not be undertaken unless we have procured your explicit consent or where the transfer is necessary for the performance of the services we have agreed to provide you

## Data retention and destruction

We take appropriate measures to ensure that any information collected from you is kept only for so long as is necessary for the purpose for which such information was collected. In determining data retention periods, Suntera takes into consideration local laws, contractual obligations, and the expectations of our customer. Any information destroyed is done so in a safe and secure manner. For further information on your data retention and destruction, please contact the Data Protection Officer using the details below.

## Your rights

You have the right to access information held about you. If you wish to exercise such right, please contact the Data Protection Officer using the details below in your respective jurisdictions. Any request to exercise any of your rights may be subject to your providing acceptable proof of identification, if required for us to ensure that the request has come from you.

- Your rights also include:
- The right to be informed;
- The right to rectification;
- The right to erasure (subject to local law);
- The right to restrict processing;
- The right to data portability; and
- The right to object.

Where relevant, you can also exercise your right at any time by contacting us (see [contact details](#) below).

## Changes to this Privacy Notice

We may change this Privacy Notice from time to time by updating this page. You should check this page regularly to ensure that you are happy with any changes.

## Contacts

Our Group's Data Protection Officer can be reached at:

Data Protection Officer  
Peveril Buildings,  
Peveril Square,  
Douglas,

Isle of Man,  
IM99 1RZ  
E-mail: [dataprotection@suntera.com](mailto:dataprotection@suntera.com)

You can also contact us via any of our offices.

## Complaints

You have the right to make a complaint about how your personal data is processed. We hope that you will make any complaints to us directly (see [contact details](#) above) in the first instance to allow us to attempt to resolve any issues. If you are not satisfied with this, you can complaint to the supervisory authority in the Isle of Man in the jurisdiction where you are based or to the appropriate supervisory authority in the jurisdiction from which we provide you services.

### Isle of Man

Name	Information Commissioner
Address	First Floor, Prospect House Prospect Hill, Douglas, Isle of Man IM1 1ET
Website	<a href="https://www.inforights.im/">https://www.inforights.im/</a>
Telephone	+44 (0)1624 693260
Email	<a href="mailto:ask@inforights.im">ask@inforights.im</a>

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### The Bahamas

Name	Data Protection Commissioner
Address	31A Poinciana House North Building East Bay Street P. O. Box N-3017 Nassau, N.P. The Bahamas
Website	<a href="#">Data Protection Commissioner</a>
Telephone	(242) 604-1001
Email	<a href="mailto:dataprotection@bahamas.gov.bs">dataprotection@bahamas.gov.bs</a>

### Cayman Islands

Name	Ombudsman Cayman Islands
Address	5th Floor, Anderson Square, 64 Shedden Road, George Town, Grand Cayman
Mail	PO Box 2252, Grand Cayman KY1-1107, CAYMAN ISLANDS
Website	<a href="#">Data Protection   Cayman Islands Ombudsman</a>
Telephone	+1 345 946 6283
Email	<a href="mailto:info@ombudsman.ky">info@ombudsman.ky</a>

### Hong Kong

Name	Office of the Privacy Commissioner for Personal Data
Address	Room 1303, 13/F, Dah Sing Financial Centre, 248 Queen's Road East, Wanchai
Website	<a href="https://www.pcpd.org.hk/">https://www.pcpd.org.hk/</a>
Telephone	+852 2827 2827
Email	<a href="mailto:communications@pcpd.org.hk">communications@pcpd.org.hk</a>

### Guernsey

Name	Office of the Data Protection Authority
Address	St Martin's House, Le Bordage, St. Peter Port, Guernsey, GY1 1BR
Website	<a href="https://www.odpa.gg/">https://www.odpa.gg/</a>
Telephone	+44 (0) 1481 742074
Email	<a href="mailto:enquiries@odpa.gg">enquiries@odpa.gg</a>

## Jersey

Name	Office of the Information Commissioner
Address	2nd Floor 5 Castle Street St. Helier Jersey JE2 3BT
Website	<a href="https://jerseyoic.org/">https://jerseyoic.org/</a>
Telephone	+44 (0)1534 716530
Email	<a href="mailto:enquiries@jerseyoic.org">enquiries@jerseyoic.org</a>

## Luxembourg

Name	Commission Nationale pour la Protection des Données (CNPD)
Address	15, Boulevard du Jazz, L-4370 Belvaux
Website	<a href="https://cnpd.public.lu/en.html">https://cnpd.public.lu/en.html</a>
Telephone	+352 26 10 60 1
Email	Not Published. Contact through WebForms on CNPD website.

## Malta

Name	Information and Data Protection Commissioner
Address	Floor 2, Airways House, Triq Il-Kbira, Tas-Sliema SLM 1549
Website	<a href="https://idpc.org.mt/">https://idpc.org.mt/</a>
Telephone	+35623287100
Email	<a href="mailto:idpc.info@idpc.org.mt">idpc.info@idpc.org.mt</a>

## United Kingdom

Name	Information Commissioner's Office (ICO)
Address	Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF
Website	<a href="https://ico.org.uk/">https://ico.org.uk/</a>
Telephone	0303 123 1113