

	CAPITAL ALLIANCE PLC – RISK & COMPLIANCE	Policy Document
	PRIVACY POLICY	
	Ver 01	Date: 30-Oct-2024

CAPITAL ALLIANCE GROUP

PRIVACY POLICY



CAL

Level 05, Millennium House,
46/58, Nawam Mawatha, Colombo 02.
Sri Lanka.
Telephone : +94-11-2317777
Fax : +94-11-2317788

1 Introduction

We, at Capital Alliance Group (“we”, “us”, “our” and the “CAL Group”, which terms as hereinafter used shall mean and refer to Capital Alliance Holdings Limited and its subsidiaries), are committed to respecting the privacy of all of those who interact with us.

The following policy therefore outlines how we collect, use, share and otherwise process Personal Data (as hereinafter defined) and includes information on the categories of Personal Data collected by us, the purposes for which it is processed and shared, as well as the rights available to you in your capacity as a “data subject” in respect of your Personal Data. This policy does not, however, apply or extend to our employees (whether current, former or prospective - including any job applicants) or to those visiting our office premises, whose respective rights and terms of processing are dealt with elsewhere in independent policies.

2 What Personal Data do we collect?

The term and expression “**Personal Data**”, for these purposes, may broadly be defined as information that relates to and can identify a particular natural person.

We collect and process a variety of Personal Data about you based on the nature, duration and extent of your interaction with us, as well as the services offered to you by the respective entities of the CAL Group. This may include categories of Personal Data such as your:

- **personal details** – including, for example, your name, date of birth, citizenship details, signature, photograph, status of residency and whether you are a politically exposed person;
- **contact details** – including, for example, your contact number (fixed line and mobile number), email address, permanent address and correspondence address;
- **state issued identification details** – including, for example, your national identity card number, passport number and tax identification number;
- **basic employment details** – including, for example, your status of employment, name and contact details of your employer and your work contact details;
- **financial information** – including, for example, your bank account details, account balances and source of funds when an investment is made;
- **online presence** – including, for example, the duration and frequency of your visits to our website, website interaction information, IP address and your social media handle details;

provided, further, that we shall inform you as and where required by applicable law where, and to the extent, that we process any other categories of Personal Data relating to you.

Any processing of Personal Data that is deemed to be a “special category of Personal Data” by applicable law, will be processed in accordance with and subject to the conditions, specifications and restrictions stipulated by applicable law (including – in particular, the Personal Data Protection Act, No. 09 of 2022 or “**PDPA**”).

3 How do we collect your Personal Data?

As you interact with us, we may collect your Personal Data in a number of different ways, including from the following sources:

- **Directly from you** – such as when you register for and use our products and services, or interact with us *via* telephone, email or our website.
- **Online** – including through our website and other online platform(s), which, like most other websites, use cookies and other technology to gather details about your interaction with such websites and platforms.
- **Our affiliates** – including when you interact with the different entities of the CAL Group – provided, however, that, unless otherwise specifically communicated to you, any sharing between the entities of the CAL Group shall be in strict accordance with this Policy.
- **Other third parties** – such as, through service providers, government institutions, statutory bodies and our business partners.

4 Why do we collect your Personal Data?

We collect and process your Personal Data for a number of legitimate business purposes - which include, but are not limited to, the following:

- to effectively provide you with our services, including efficient customer support, account management and for the processing of payments;
- to pursue our business relationship with you, to keep you informed and updated about our service and product offerings and other business activities;
- to comply with legal and statutory obligations, protect and enforce our rights, or respond to requests for information issued by government or statutory authorities (including but not limited to the Central Bank of Sri Lanka, the Colombo Stock Exchange, the Securities and Exchange Commission and the Inland Revenue Department);
- for safety or security reasons, such as to detect and / or prevent fraud or the misuse of any of services and for the safety of our personnel and infrastructure; and

- for our own internal purposes, such as for monitoring, analysing and evaluating the performance of our services and for maintaining internal records.

We may also anonymize, tokenize and / or aggregate Personal Data in a manner where you may no longer be personally identifiable. In such instances, you acknowledge and agree that that the CAL Group may utilize such non-Personal Data for any lawful purpose without further notice to you.

5 For how long do we retain your Personal Data?

As a general policy, we process your Personal Data for as long as it may be required to:

- make our services available to you;
- comply with applicable legal and statutory obligations and information requests; and / or
- fulfil the legitimate business purposes for which such Personal Data was collected, as described in Part 4 of this Policy.

Once your relationship or engagement with us has ended, we may still retain your information in our systems and records to, for example, ensure the adequate fulfilment of any surviving provisions in a terminated / expired contract or to comply with any record keeping obligation(s) imposed on us under applicable law.

Furthermore, if, at any instance, your Personal Data has been collected solely on the basis of your consent and not in accordance with any other lawful basis of processing as recognized by applicable law, then such Personal Data shall be retained until the purpose for which it was processed is fulfilled, or until you revoke the consent previously granted to us – whichever may occur first.

6 To whom may we disclose your Personal Data?

For the fulfilment the purposes set out in Part 4 above and in relying on the lawful bases for processing as permitted by applicable law, we may disclose and / or transfer your Personal Data to the following categories of third parties:

- **Within the CAL Group** – we may, in limited circumstances, share your Personal Data within the CAL Group to facilitate internal administration and business operations.
- **Authorized agents and representatives** – where you have designated an authorised agent or representative to act on your behalf, we may disclose certain specified personal information to such authorised representatives, to the extent permitted and subject to the limitations prescribed by applicable law.

- **Service providers and partner entities** – to the extent necessary to facilitate, deliver and / or improve our services or other interactions with you, we may disclose your Personal Data to third-party service providers and business partners – including, but not limited to, investment managers registered with the Securities and Exchange Commission of Sri Lanka (where applicable), information technology service providers, payment processors and licensed financial service providers for facilitating necessary monetary transfers.
- **Third parties for legal, security or safety purposes** – we may disclose your Personal Data to professional advisors, law enforcement authorities and / or other government agencies and state instrumentalities to comply with legal and statutory requirements, to enforce and defend our legal and equitable rights, as well as to protect the rights, property and safety of our customers and associated third parties.
- **Third parties in connection with a business transaction** – in the event any of the entities of the CAL Group is acquired by or merged with any other company, we may share certain Personal Data with our advisors and / or potential transactional partners in the process of negotiating or completing the transaction.
- **Other third parties with your consent** – in situations not covered by the above categories of personnel, we will seek your consent prior to disclosing your Personal Data to third parties.

We may also transfer your Personal Data to entities located outside Sri Lanka for the purposes outlined in this Policy – where the Personal Data protection laws are likely to differ to that of Sri Lanka. In such instances, we will ensure that such cross-border transfers are in accordance with and subject to the limitations imposed by the PDPA, the directions or orders of the Data Protection Authority of Sri Lanka and any other applicable law.

7 Security

We take reasonable effort to monitor and update our security standards in relation to your Personal Data, by implementing appropriate and commercially acceptable contractual, technical and organizational measures to help prevent the loss, misuse of and unauthorized access to your Personal Data.

Despite our best efforts, however – we cannot guarantee the absolute security of such Personal Data, given that no means of data transmission or storage is 100% secure. Furthermore, when you access a link to a third-party site – whether accessible on or through our website or other platforms, you acknowledge that you will be leaving our website and, accordingly, that we cannot control, endorse or be held responsible for the security of any such third-party website.

8 Your rights

As a data subject, you are vested with certain rights in respect of your Personal Data, subject to the specifications and restrictions imposed by applicable law. Such rights include:

- **The right to request access to your Personal Data** – this enables you to request a copy of your Personal Data processed by us.
- **The right to request the rectification of your Personal Data** – this enables you to request us to correct and / or complete any Personal Data that we hold in relation to you which may be demonstrably inaccurate and / or incomplete.
- **The right to request the erasure of your Personal Data** – this enables you to request us to delete or remove your Personal Data to the extent specified and limited by the PDPA.
- **The right to withdraw consent** – where and to the extent certain Personal Data is processed solely on the basis of your consent, this enables you to withdraw your consent – provided, however, that no such withdrawal shall affect the legality of any processing prior to such withdrawal.
- **The right to object to further processing** – in certain limited circumstances, as stipulated by the PDPA, you may request us to refrain from further processing your Personal Data. However, where such Personal Data is fundamental and indispensable to the provision of our services, we may be prevented from offering our services to you thereafter.
- **The right to review an automated decision** – in the limited circumstances that a decision has been arrived at solely on the basis of automated processing, this enables you to request us to review such decision – subject to the conditions prescribed by the PDPA.

In exercising such rights, you must however ensure that your requests:

- are communicated in writing and addressed to Manager - Customer Experience Center;
- set out the nature of the request and the respective right being exercised by you; and
- fairly and reasonably identify the Personal Data in respect of which you wish to exercise such right.

We will respond to all data subject requests within the time frame(s) prescribed by applicable law. In doing so, we reserve the right to request and require you to provide additional information where, and to the extent, such information is necessary to process your request (for e.g., where you have failed or neglected to reasonably identify the Personal Data to which your request relates). We also reserve the right to decline processing any requests that are manifestly unfounded, fraudulent or otherwise not permitted by applicable law.

Where, and to the extent, you have any further queries, concerns or clarifications regarding the processing of your Personal Data by us, you may contact the Data Protection Authority of Sri Lanka in respect of the same.

9 Changes to the Policy

We may update and revise this policy in accordance with the rapidly changing commercial, legal, regulatory and technological landscape. For such reason, we encourage you to visit our website and this Policy to ensure that you are aware of and updated on the manner and extent to which your Personal Data is processed by us.

This policy is effective from the 30th October , 2024