

PRIVACY NOTICE

We, at Capital Alliance Investments Limited, Capital Alliance Securities (Pvt) Ltd and Capital Alliance PLC (hereinafter referred to as the “Company” “we” “us” and “our”), are steadfast in our commitment to respecting your privacy.

While the group privacy policy applicable to Capital Alliance Holdings Limited and its subsidiaries – including the Company (hereinafter collectively referred to as the “Group”) is available on our website (accessible here [insert respective URL]) and shall be deemed to be incorporated herein by reference, this Privacy Notice sets out some of the important terms and conditions upon which we shall process any personal data that you provide us with for the purpose of this application, as well as on your rights in respect of such personal data under applicable law – including, the Personal Data Protection Act, No. 09 of 2022 (the “PDPA”).

Purpose of Processing your Personal Data

The collection of your personal data for the purposes of this application is an essential pre-requisite for us to provide you with our services (which include updating you on any additional or complimentary services provided by the Group), and the processing of such personal data is necessary for the effective fulfilment of our contractual obligation to you. Therefore, the non-disclosure of any personal data requested from you would preclude us from extending our services to you.

The Company also has a legitimate interest in processing your personal data, such as for the purpose of pursuing any and all legal claims held by the Company pursuant to our contractual arrangement. Furthermore, the processing of your personal data is necessary for complying with applicable legal and regulatory requirements – including those imposed by the Colombo Stock Exchange, the Securities and Exchange Commission of Sri Lanka, the Inland Revenue Department, the Central Bank of Sri Lanka, etc.

Types of personal data processed

In order to fulfil the purposes set out above, we process the following categories of personal data:

- **Personal details** – including, for example, your name, date of birth and citizenship details;
- **Contact details** – including, for example, your contact number, permanent address (including your status of residency), correspondence address and email address;
- **State issued identifications details** – including, for example, your national identity card or passport number;

- **Financial details** – including, for example, your bank account details, bank statements, tax identification number, source of income and billing proof; and
- **Other details necessitated by applicable law** – including, for example, affiliations to any Politically Exposed Persons (PEPs), your foreign account tax compliance status and other personal data that is statutorily required to be collected as a part of the KYC process.

Where and to the extent that: (a) the further collection of your personal data is deemed necessary for any of the purposes set out above; and / or (b) the collection and processing of “special categories of personal data” (as defined by the PDPA) is required for the aforementioned purposes, you will be notified accordingly.

Retention period

We will process your personal data for as long as it is required to: (a) provide you with our services; (b) to comply with any legal or statutory obligations pertaining to your personal data; and / or (c) to respond to information requests by any legal or statutory body.

Where and to the extent that your personal data is anonymized or tokenized, in a manner in which you are no longer personally identifiable through such data, you hereby agree grant us the right to utilize and process such data for any lawful purpose without any further notice to you.

Transfer of personal data

Your personal data may be shared: (a) within the Group to facilitate the effective and seamless provision of our services; (b) with third parties for the purpose of ensuring the fulfilment of our contractual commitment to you (for example, with investment managers registered with the Securities and Exchange Commission of Sri Lanka, where applicable); (c) with service providers and business partners, to the limited extent required to effectively deliver our services to you; and (d) with legal and regulatory authorities, as and where required by law.

For the purposes set out above in this Privacy Notice, your Personal Data may be transferred to, stored and maintained on servers and systems located outside of Sri Lanka. While the Company shall seek to adopt all reasonable and commercially acceptable technical, contractual and organizational means to protect the confidentiality and integrity of such Personal Data, you equally acknowledge: (a) that the Group cannot guarantee its absolute security, confidentiality and integrity; and (b) that the Group shall not be responsible for any loss of confidentiality and / or integrity arising from or in connection with the unlawful, malicious or negligent actions or omissions of a third party.

Your rights

We encourage you to familiarise yourself with your rights as per our general privacy policy and the PDPA. Your rights in terms of the processing of your personal data by us include:

- The right to access and receive a copy of your personal data processed by us;
- The right to request the rectification of any inaccurate or incomplete personal data; and
- The right to request the erasure of your personal data, subject to the limitations provided by the PDPA.

Contact us

If you have any further queries or concerns regarding the processing of your personal data by us, you may contact the Data Protection Authority of Sri Lanka.

Respecting your privacy is integral to our ethos. For further details regarding the processing of your personal data or for the facilitation of your rights granted by the PDPA, please contact calcompliance@cal.lk.