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CORPORATE SERVICE PROVIDER

## **PRIVACY POLICY**

**22/12/2022**

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## 1. Aim & Purpose

The aim and purpose of the General Privacy Policy is for Data Subjects to understand how their personal data is being processed by the data controller and data processors.

This policy is to be shared with JD-CSP's data subjects whenever they request a copy to recognize how JD-CSP is retaining their personal data.

## 2. Definitions

<b>Data Controller</b>	is a natural or legal person, public authority, agency or other bodies which, alone or jointly with others, determines the purposes and means of the processing of personal data.
<b>Data Processor</b>	is a natural or legal person, public authority, agency or other bodies which processes personal data on behalf of the Data Controller.
<b>Personal Data</b>	means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as 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 natural person.
<b>Processing</b>	any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
<b>Subject Access Request</b>	a written request made by or on behalf of an individual for the information about them, which is held by JD-CSP.
<b>User</b>	any person who accesses the JD-CSP website.

## 3. Introduction

JD-CSP is a Corporate Service Provider licensed by the Malta Financial Services Authority and are committed to ensuring that the personal data processed is handled in accordance with the General Data Protection Regulation 2016/679 ("GDPR") and the Data Protection Act ("DPA").

JD-CSP also has a Data Protection Manual which its implementation is the responsibility of the IT Department. The IT Department can be contacted via [dataprotection@jd-csp.com](mailto:dataprotection@jd-csp.com).

## 4. Subject Access Request

JD-CSP as a data controller is responsible to inform its clients about the different ways JD-CSP collects and use clients' personal data.

Individuals whose data JD-CSP processes are known as data subjects and hence, all data subjects have certain rights in relation to the processing of their data.

Data subjects have the right to:

- ask JD-CSP to confirm that your personal data is being processed and to access (i.e. have a copy) of that data as well as to be provided with supplemental information about the processing;

- request that JD-CSP rectify any inaccuracies where the data JD-CSP holds on you is inaccurate or incomplete;
- to have your data erased by JD-CSP, although in certain circumstances JD-CSP may not be able to do this;
- to restrict the processing of your personal data in certain ways;
- to obtain your personal data for reuse;
- to object to certain processing of your personal data.

Not all of these rights apply in all circumstances. For data subjects to exercise any of these rights, they are encouraged to request what is known as a Subject Access Request to JD-CSP on [dataprotection@jd-csp.com](mailto:dataprotection@jd-csp.com).

## 5. What Information Does JD-CSP Collect From Data Subjects?

JD-CSP holds and processes personal data concerning:

- Financial records;
- Legal information;
- Identification documents,
- Due Diligence documents.

Therefore, JD-CSP processes the following personal data:

- Full name, date and place of birth, sex, age, address, citizenship, information on education, contact details (home address, mobile telephone numbers, e-mail addresses), bank account details, expenses claimed, salary and remuneration details, links to relatives and marital status;
- Information contained in personal identification documents (including passports details), tax identification number and tax status, national and social security numbers;
- Information about former and current employment, information about work experience, skills and competencies, personal and business qualities pertaining to professional activities of Data Subject, training and qualifications, CVs and similar training data;
- Information required for any purposes relating to the engagement of any service from JD-CSP including criminal cautions and convictions, and other sensitive information.

Additionally, JD-CSP collects the following information via its website:

- Cookies: small pieces of text that is stored on the User computer to keep track of any settings the User may have set on their website (the User may delete their cookies via their browser's settings);
- IP address: the User's computer's Internet address to improve user experience (collected by JD-CSP's website provider, WIX);
- Location for website access: the location as determined by the User's IP address for analytics purposes;
- Any other publicly available information such as information about the browser used to access JD-CSP's website.

The security of the User's data is of utmost importance to us; however, the User must remember that no method of transferring data online is 100% secure and therefore whilst JD-CSP strive to protect the User's personal data and make use of a range of physical, electronic and managerial measures, JD-CSP cannot guarantee its absolute security.

## 6. Using the 'Contact Us' Feature on the JD-CSP Website

When the User uses this feature on the JD-CSP website to enquire about JD-CSP's service, JD-CSP will ask the User to provide JD-CSP with contact details including first name, last name, email address and phone number. This information is forwarded to JD-CSP's team to get back to the User's queries.

## 7. How is Personal Data Collected?

JD-CSP collects data in various forms such as correspondence including emails and documents provided by the data subject themselves. However, JD-CSP also collects data from third parties such as for due diligence systems and information that is made readily available to the general public.

## 8. Why Does JD-CSP Collect This Information?

JD-CSP collects only the data JD-CSP needs, and keeps the data up to date and only for as long as it is needed. Therefore, JD-CSP may use this data for the following purposes:

- To provide and maintain its Services;
- To conduct due diligence;
- To maintain customer record keeping;
- To carry out and fulfil contractual obligations and commitments;
- To communicate with the Client as well as to manage their requests;
- To carry out financial processes;
- To carry out legal processes.

JD-CSP takes their obligations for data handling very seriously and it is therefore important for data subjects to know the lawful basis for JD-CSP processing your information. JD-CSP's lawful basis for processing personal data fall within any one of the following scenarios:

- A. Consent – when the data subject has given consent to the processing of their personal data for one or more specific purposes;
- B. Contract – when processing is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract;
- C. Legal Obligation – when processing is necessary for compliance with a legal obligation to which JD-CSP is subject to;
- D. Vital Interest – when processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- E. Public Task – when processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller;
- F. Legitimate Interest – when processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third-party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

JD-CSP also processes the above stated data in their legitimate interests to facilitate and administer their services to staff and their customers/suppliers. These legitimate interests are determined through an assessment made by weighing their requirements against the impact of the processing on you. Their legitimate interests will never override your right to privacy and the freedoms that require the protection of your personal data. If you are interested in learning more about this legitimate interest assessment, please contact [dataprotection@jd-csp.com](mailto:dataprotection@jd-csp.com).

## 9. What Does JD-CSP Do With Client's Personal Data?

Personal Data is processed at JD-CSP's operating offices and in any other places where the parties involved in Processing are located. This means that this information may be transferred to and maintained on computers located outside the data subject's state, province, country.

Personal Data is also stored electronically on JD-CSP's Server as well as physically in files. JD-CSP takes every precaution to safeguard your data through both technical and physical measures such as through policies, procedures, and processes to prevent data loss, misuse, theft, modification, disclosure, or destruction.

## 10. How Long Does JD-CSP Keep Personal Data?

Financial records are kept for 5 years and Legal information is also kept for 5 years and/or end of incident/matter.

## 11. Who Does JD-CSP Share Personal Data With?

JD-CSP may share personal data with the following third-parties:

- Service Providers – personal data may be shared with service providers who assist in the running of the business of JD-CSP;
- Authorities – personal data may be shared with authorities for the provision of certain services;
- Law Enforcement – under certain circumstances, JD-CSP may be required to disclose personal data of Data Subjects if required to do so by law or in response to valid requires by public authorities (e.g. a court or a government agency).

JD-CSP may disclose personal data in good faith belief that such action is necessary to:

- Comply with a legal obligation;
- Protect and defend the rights or property of JD-CSP;
- Prevent or investigate possible wrongdoing in connection with the Service;
- Protect against legal liability;

## **12. Document Information**

This Policy shall be reviewed at least annually or whenever it is necessary.