



CostWatch

COSTWATCH (CAYMAN) LTD

PRIVACY NOTICE

CostWatch (Cayman) Ltd (**CostWatch**) and its affiliated entities are committed to being responsible custodians of the information you provide to us and the information we collect in the course of operating our business. References to **we, us** or **our** in this Notice are references to CostWatch.

This privacy notice (**Notice**) sets out how CostWatch as a data controller may collect, use and share information in relation to the provision of their services, and describes:

- The types of information, including personal information, we may collect;
- How we may use and share the information we collect;
- The legal grounds for using personal information;
- The measures we have in place to protect and safely store the information we collect;
- Retention of the information we collect;
- How we make decisions about you;
- Your choices and rights in respect of the information we hold;
- How to contact us;
- Complaints; and
- Changes to this Notice.

The types of information we collect

"Personal Information" is any information that can be used to identify you or that we can link to you as an individual.

We may collect personal information from a range of sources and it may relate to services you currently use or have used in the past. We may also collect information about you when you interact with us, e.g. visit our website at www.costwatch.ky (**Website**) or call us to ask about our services.

Some of the personal information will come directly from you. It can also come from third parties including property strata managers. We might also collect personal information from publicly available sources.

Information you provide to us:

The types of personal information that we collect may include:

- Full name, previous name, date and place of birth and gender;
- Contact details including postal address, email address, landline and mobile telephone numbers;
- Company or organisation details;
- Information we collect automatically through cookies and similar tracking technologies through our Website;
- We may also collect information that you voluntarily provide to us, including when you communicate with us via email or other channels and when you respond to our communications or requests for information.

Information we collect or generate about you:

- information we use to identify and authenticate you; and
- records of correspondence and other communications between us;

Information we may collect from third party sources:

We may receive information about you from other sources, including third parties that help us prevent or detect fraud or process payments. We may also receive information that you've asked us to collect for you.

How we use the information we collect

We may use the information we collect:

- to deliver our services;
- to carry out your instructions, for example to fulfil a payment request;
- to manage our relationship with you, respond to your enquiries or to any problems that may arise and to investigate and resolve complaints;
- to inform you of important changes or developments to the services or our policies and to provide you with technical, support or administrative notifications;
- to ensure business continuity;
- to undertake data analytics to better understand your circumstances;
- to protect our legal rights and comply with our legal obligations;
- to correspond with lawyers, utility companies, strata managers and third party intermediaries;
- for insurance, audit and administrative purposes;
- to send you marketing communications, and other information or materials that may be of interest you or which you have expressed an interest in receiving (and subject to your ability to opt-out from receiving those communications);
- for internal development of new products or services;
- for our internal business purposes, including data analysis and invoicing; and
- as we believe reasonably necessary, advisable or appropriate to comply with our legal or regulatory obligations or to protect your, our, or others' rights.

Further, we may aggregate personal and other data captured by us so that the data is no longer capable of identifying an individual. Aggregated data may cover patterns of usage, and we reserve the right to use this aggregated information for the purposes of improving and enhancing our services, generating insights, for use in marketing to other users and current and potential partners and otherwise for the purposes of our business. Provided that such aggregated data does not directly or indirectly identify you as an individual, this data is not considered to be personal information for the purpose of this Notice.

How we may share the information we collect

We may share the personal information we collect with our current or future affiliated entities, as explained at the beginning of this Notice.

We may also disclose information we collect:

- To our affiliated entities, associated companies and third party service providers that perform services on our behalf, such as web-hosting companies, analytics providers and information technology providers. In these circumstances contractual and other technical and security safeguards will be put in place with the affiliated entities, associated companies or third party service provider, including to ensure that your personal information is processed only in accordance with this Notice.
- To law enforcement, other government authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us, as provided for under contract or as we deem reasonably necessary to provide our services. In these circumstances, we will take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- To service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged with another company or we sell, liquidate, or transfer all or a portion of our assets. Upon completion of such a transaction, your personal information will continue to be processed in accordance with this Notice, except as agreed otherwise by you or permitted by applicable law.
- To our employees, sub-contractors, agents or service providers who work for us where required or necessary for the performance of their duties and in line with the reasons for processing.
- To anybody else that we've been instructed to share your information with by you.

We do not sell, rent, or otherwise share personal information that reasonably identifies you or your organisation with unaffiliated entities for their independent use except as expressly described in this Notice or with your prior permission. We may share information that does not reasonably identify you or your organisation as permitted by applicable law.

Grounds for using your personal information

We rely on the following legal grounds to process your personal information, namely:

- *Necessity for performance of a contract* – We may need to collect and use your personal information to enter into a contract with you or to perform a contract that you have with us;
- *With your consent* - We may use personal information as described in this Notice subject to your consent. To withdraw your consent you can contact us via our Contact Us page, or you may be able to disable the sharing of location information in your browser or mobile application settings. Where required by applicable laws, we will rely on your consent for direct marketing and to collect information from your device or computer.
- *Legal obligation* – We may process your personal information as may be required to comply with any legal or regulatory obligations that may apply to us.
- *Legitimate interests* – We may use your personal information for our legitimate interests to improve our services.

Third party services and content

Our Website **WWW.COSTWATCH.KY** may include integrated content or links to content provided by third parties (such as social media content, plug-ins and applications).

Protection and storage of the information we collect

We deploy administrative, technical and physical safeguards designed to comply with applicable legal requirements and to safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with safeguards designed to provide a level of protection equivalent to that adopted by the Issuer.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the internet and wireless networks.

We may store the information we collect in on our servers (both cloud based or in servers located in secure data centres within the USA and the Cayman Islands where we or our service providers have facilities. Therefore, we may transfer information to countries outside the Cayman Islands or your country of residence which may have data protection laws and regulations that differ from those in your country.

Retention of the information we collect

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

How we make decisions about you

We may use automated systems to help us make decisions. Ultimately, all decisions are made with human intervention.

Your choices and rights

Under local law, you may have certain rights regarding your personal information that we have collected. Residents of the Cayman Islands have the right to request (i) access to your personal information, (ii) rectification or erasure of personal information, (iii) restriction of processing concerning you, and (iv) objection to processing that is based upon our legitimate interests. Your ability to exercise these rights will depend on a number of factors and, in some instances, we will not be able to comply with your request, for example because we have legitimate grounds for not doing so or where the right doesn't apply to the particular information we hold on you. If you would like to discuss or exercise the rights you may have, you can contact us through the methods stated below.

It is important that any personal information we hold about you is accurate and current. Please keep us informed if your personal information changes whilst we continue to retain such information. If you provide information for another person (for example, a dependant), you'll need to direct them to this Notice. If we need that person's consent, we will ask you to confirm that you have obtained such consent. We encourage you to contact us to update or correct your information if it changes or if you believe that any information that we have collected about you is inaccurate or out of date. You can also ask us to see what personal information we hold about you and to erase your personal information if it is no longer required. You may also tell us if you object to our use of your personal information.

How to contact us

If you would like to contact us regarding this Notice please send us an email to mydata@costwatch.ky In each case, to ensure your query is dealt with as swiftly as possible, please include as the subject or heading line "Privacy Notice".

info@costwatch.ky

P.O. BOX 10051, GRAND CAYMAN, KY1-1001

U15 BREEZY CASTLE, OWEN ROBERTS DR., GRAND CAYMAN

Complaints

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If you would like to contact us, please use the methods stated above.

If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to complain to the Ombudsman or the relevant data protection authority in your jurisdiction.

Cayman Islands Ombudsman

3rd Floor, Anderson Square,

64 Shedden Road,

George Town,

Grand Cayman

info@ombudsman.ky

+1 345 946 6283

Changes to this Notice

We may update this Notice from time to time and we encourage you to periodically review this Notice. The use of certain of our services may also be governed by other applicable terms and policies regarding privacy and the sharing of personal information, which supplement, and should be reviewed alongside, this Notice.

If we make any material changes to this Notice regarding the way we collect, use, and/or share the personal information that you have provided and we hold your email or other contact information, we will notify you by email or other communication.

Last updated: October 2020