

VSTAR LIMITED

Privacy Policy

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A. Introduction

This Privacy Policy summarizes our legal obligations under the Data Protection Act 2017 in our capacity as data controller and/or processor depending on the case. Vstar Limited (“the Company” or “We”) shall ensure prompt compliance with this policy. It should be noted that the Company shall refer to this policy as guidance, but in general, shall ensure prompt compliance with all applicable requirements of the Data Protection Act 2017, which shall remain the main document to consult in relation to Data Protection compliance.

Any terms not explained in this document shall have the same meaning as in the Data Protection Act 2017.

B. Registration

The Company shall be registered with the Data Protection Commissioner (“the Commissioner”) and shall subsequently renew its registration within 3 months of the expiration date.

C. Change in Particulars

Where, following the grant of an application, there is a change in any of the particulars referred to in section 15(2), the Company, shall, within 14 days of the date of the change, notify the Commissioner in writing of the nature and date of the change

D. Information We Collect

a. Personal Information: In view of our normal course of business, we are required to collect customer due diligence information and documents including but not limited to personal information such as name, contact details (e.g., email address, phone number), source of funds information, any criminal/judicial/regulatory/administrative sanctions etc.

b. Usage Information: We shall use the information collected to provide services to our clients and comply with our legal obligations as a regulated entity.

c. Cookies and Similar Technologies: We may use cookies and similar technologies on our to enhance your experience, analyze trends, track user activity, and gather information about your preferences. We shall ensure that our website has a positively affirmed opt-in cookie policy to record the consent of any visitor.

E. Use of Information

a. We use the collected information to provide and improve our services, personalize the experience of our customers, respond to inquiries or requests, and communicate our customers.

b. In case we intend to use personal information to send promotional materials, updates, and other communications, we shall ensure that the customer has affirmatively opted-in to receive such information by way of a written consent. The customer has the right to opt-out of these communications at any time.

c. We may analyze aggregated and anonymized data for statistical purposes, research, and market analysis.

d. In case we want to use the personal data collected for any other purpose that that outlined in the agreement signed between the customer and us, we shall ensure that there is a lawful basis for doing same and that the processing is conducted in accordance with principles outlined under Section 21 of the Data Protection Act 2017.

F. Sharing of Information

a. All personal data collected shall be used for the sole purpose detailed in the agreement entered into between the customer and us. We shall not process personal data in any manner not in line with the purposes described in the said agreement.

b. They may share information with trusted service providers and business partners who assist it in delivering our services, such as hosting providers, payment processors, and marketing platforms. These third parties are obligated to maintain the confidentiality and security of your information. This confidentiality duty shall be inserted in any contractual arrangement put in place with such service provides.

c. We may disclose information if required by law, legal process, or government request, or when we believe in good faith that such disclosure is necessary to protect our rights, safety, or the rights of others.

G. Data Security

a. We implement reasonable security measures (please refer to our Information Security Policy) to protect personal information against unauthorized access, loss, alteration, or disclosure. Personal data entrusted to us shall be kept with utmost confidentiality and all employees of the Company shall be bound by a duty of confidentiality in their employment contract or any other stand-alone contractually binding document.

H. Rights of Data Subjects

Right to Withdraw Consent

In the event where the Processing of Personal data is based on consent as lawful basis, the data subject may withdraw his consent at any time by notifying the Company.

Right of Access

Upon request, a data subject shall have the right to obtain from the company without charge and within one (1) month of the request.

Right to Erasure

A Data Subject has the right to require the Company to erase his/her Personal Data where some specific criteria as laid down under Section 39 of the Data Protection Act 2017 are met.

Right to Rectification

A Data Subject has the right to request the Company to rectify his/her Personal Data in case same is not accurate, complete or up to date without undue delay.

Right to Object

A Data Subject has the right to object to the Processing of his/her Personal Data in writing at any time on reasonable grounds relating to this particular situation where such processing is carried out on the basis that it is necessary for the purposes of compelling legitimate grounds for the processing which override the data subject's interests, rights and freedoms or for the establishment, exercise or defence of a legal claim.

Right to Restrict

A Data Subject shall have the right to require the Company to restrict Processing to the extent that any of the requirements provided under the Data Protection Act 2017 are met.

Exercise of Rights

Data Subjects shall be directed to send a written correspondence to the Data Protection Officer of the Company. Once a written request is received, the Data Protection Officer shall assess the lawfulness of such request and direct a relevant employee to prepare the requested information for onward submission to the data subject if all criteria have been satisfied.

The Data Protection Officer may find it necessary to verify the identity of any data subject prior to acceding to any exercise of rights.

I. Children's Privacy

Our services are not intended for individuals under the age of 16. We do not knowingly collect personal information from children without appropriate parental consent. If you believe we have inadvertently collected information from a child.

In case any person believe that we have, inadvertently collected information on a child, the person should send our Data Protection Officer a written correspondence in this regard.

J. Changes to this Privacy Policy

This Policy shall be reviewed at least on an annual basis to ensure that it remains relevant and up to date pertaining to any changes in the Law.

K. Data Protection Officer

The designation of a data protection officer (DPO) is mandatory according to section 22(2)(e) of the Data Protection Act 2017 (DPA). This office requires controllers and processors to appoint a DPO to inform and advise them as well as their employees on their obligations to comply with the DPA and other data protection standards. The DPO will be the contact point with respect to data subjects, the Data Protection Office and internally within the organisation (controller).

The Company shall determine the best way to set up the DPO's functions and whether this necessitates a data protection team. If the organisation has a team, it should clearly set out the roles and responsibilities of its team members and how it relates to the DPO.

The Company has appointed a Data Protection Officer in accordance with Section 22 of the Data Protection Act 2017. The Data Protection officer shall have as main responsibility and duties the below:

- Inform and advise the controller/processor and its employees about their obligations to comply with the DPA and other data protection laws.
- Monitor compliance with the DPA and other data protection laws, including managing internal data protection activities, advise on data protection impact assessments, train staff and conduct internal audits.
- Be the first point of contact for the Data Protection Office and for individuals whose data are processed (employees, customers, amongst others).

The Data Protection Officer shall have the below skills and experience:

- expertise in the Data Protection Act 2017 (DPA) and relevant data protection laws and practices including the GDPR if the organisation is processing personal data of EU data subjects;
- understanding of the processing operations carried out;
- understanding of information technologies and data security;
- knowledge of the business sector and the organisation;
- ability to promote a data protection culture within the organisation

The Data Protection Officer shall not hold a position within the Company that leads him or her to determine the purposes and the means of the processing of personal data which are the duties of the controller. Due to the specific organisational structure in each organisation, this has to be considered case by case. At the same time, the Data Protection Officer should not be expected to manage competing objectives that would result in data protection taking a secondary role to business interests.