



DATA PRIVACY POLICY

October 2024

DATA PRIVACY POLICY

October 2024



Preamble

International Conflict and Security Consulting Ltd. ("INCAS") values your privacy and cares about the way in which your personal data is treated. This policy describes what personal data we collect about you, how we obtain it, how we use it, on what basis, how long we keep it for, who we share it with, how we protect it, and your rights regarding its control and processing.

In this policy "INCAS" refers to International Conflict and Security Consulting Ltd., a Malta-registered company, and 'personal data' is defined as any information relating to an individual, whether it relates to their private, professional or public life. It can be anything from a name, a home address, a photo, an email address, bank details, posts on social networking websites, medical information, social services records, records of criminal convictions, or a computer's IP address.

Personal data we collect

We may collect personal data from you in the course of our business together, including through your use of our website, when you contact or request information from us, when you engage our services, join our team, or as a result of your relationship with one or more of our staff and clients.

The personal data that we process includes:

- Basic data, such as your name (including prefix or title), the company you work for, your title or position and your relationship to a person;
- Contact data, such as your postal address, email address and phone number;
- Financial data, such as payment-related information;
- Identification and background data provided by you or collected as part of our business acceptance, employment or recruitment processes;
- Technical data, such as data from your visits to our website or in relation to materials and communications we send to you electronically;
- Data you provide to us for the purposes of attending meetings and events, including access and dietary requirements;
- Personal data provided to us by or on behalf of our clients or generated by us in the course of providing services to them; and
- Any other data relating to you which you may provide to us or ask us to obtain on your behalf.

DATA PRIVACY POLICY

October 2024



How we obtain your personal data

We collect data from you:

- As part of our business acceptance and on-boarding processes and about you and others as necessary in the course of providing services;
- When you provide it to us, or interact with us directly, for instance engaging with our staff or registering on one of our websites;
- When you participate in service delivery and assignments for our clients;
- When monitoring our technology tools and services, including our websites and email communications sent to and from INCAS; and
- We may collect or receive data about you from other sources, such as keeping the contact details we already hold for you accurate and up to date using publicly available sources.

How we use your personal data

INCAS collects and processes personal data about you in a number of ways, including through your use of our websites and in the provision of services by us. We use that data:

- To provide and improve our website, including monitoring its use;
- To promote our services, including submitting proposals, sending publications and details of events;
- To manage and administer our relationship with you and our clients;
- To provide and improve our services to you and to our clients, including handling the personal data of others on behalf of our clients;
- To provide data requested by you;
- To fulfil our legal and risk management obligations; and
- For the purposes of employment and recruitment.

Use of our websites

Some facilities on our websites invite you to provide us with personal data, such as our email queries facilities. The purpose of these facilities is apparent at the point that you provide your personal data and we only use that data for those purposes.

Our website uses Google Analytics, a web-based analytics tool that tracks and reports on the manner in which the website is used to help us to improve it. Google Analytics does this by placing small text files called 'cookies' on your device. The data that the cookies collect, such as the number of visitors to the site, the pages visited and the length of time spent on the site, is aggregated and therefore anonymous.

You may refuse the use of cookies or withdraw your consent at any time by selecting the appropriate settings on your internet browser, but please note that this may affect your use and experience of our websites. By continuing to use our websites without changing your privacy settings, you are agreeing to our use of cookies.

DATA PRIVACY POLICY

October 2024



Marketing and other emails

If you receive emails from us and no longer wish to do so, you may unsubscribe at any time by emailing us at info@incasconsulting.com with the subject line 'unsubscribe'.

Meetings, events and seminars

We will collect and process personal data about you in relation to your attendance at an event or seminar organised by INCAS or its business partners. We will only process and use special categories of personal data about your dietary or access requirements in order to cater for your needs and to meet any other legal obligations we may have.

Service provision

We collect, create, hold and use personal data in the course of and in connection with the services we provide to our clients. We will process identification and background data as part of our business acceptance, finance, administration and marketing processes, including anti-money laundering, conflict, and reputational checks. We will also process personal data provided to us by or on behalf of our clients for the purposes of the work we do for them. The data may be disclosed to third parties to the extent reasonably necessary in connection with that work.

Please also see 'Who we share your personal data with' and 'Which countries we transfer your personal data to' below.

On what basis we use your personal data

We use your personal data on the following bases:

- To perform a contract, such as engaging with an individual to provide services;
- To comply with legal obligations;
- For legitimate business purposes.

We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Please see 'How we use your personal data' for more detail.

How long we keep your personal data

Your personal data will be retained in accordance with our data retention policy which categorises all of the data held by INCAS and specifies the appropriate retention period for each category of data. Those periods are based on the requirements of applicable data protection laws and the purpose for which the data is collected and used, taking into account legal requirements to retain the data for a minimum period, good practice and business purposes.

If you use our services we will usually retain your data for 15 years, starting from when services are completed. After 15 years your data is destroyed, unless you have asked us to store data for you.



Who we share your personal data with

We may share your personal data with certain trusted third parties in accordance with contractual arrangements in place with them, including:

- The companies that are part of the International Conflict and Security Consulting Ltd. group of companies;
- Suppliers to whom we outsource certain support services such as word processing, photocopying, and translation;
- Clients, when they require basic information about you for the purpose of implementing an assignment;
- Our professional advisers and auditors;
- IT service providers to INCAS; and
- Third parties involved in hosting or organising events or seminars.

While it is unlikely, we may be required to disclose your data to comply with legal or regulatory requirements. We will use reasonable endeavours to notify you before we do this, unless we are legally restricted from doing so.

If in the future we re-organise or transfer all or part of our business, we may need to transfer your data to new INCAS entities or to third parties through which the business of INCAS will be carried out.

INCAS uses social media sites such as LinkedIn and Twitter. If you use these services, you should review their privacy policy for more information on how they deal with your personal data.

We do not sell, rent or otherwise make personal data commercially available to any third party, except with your prior permission.

How we protect your personal data

We use appropriate security measures to prevent your personal data from being lost, used or accessed in an unauthorised way, altered or disclosed. We have procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Which countries we transfer your personal data to

In order to provide our services we do not generally need to transfer your personal data to locations outside the European Economic Area ('the EEA') or North America (US and Canada) for the purposes set out in this privacy policy.

Where our third-party service providers process personal data outside the EEA or North America in the course of providing services to us, our written agreement with them will include appropriate measures to ensure that your personal data remains protected and secure in accordance with applicable data protection laws.

Your rights regarding your personal data

The European Union's General Data Protection Regulations and other applicable data protection laws provide certain rights for data subjects.

DATA PRIVACY POLICY

October 2024



You are entitled to request details of the data we hold about you and how we process it. You may also have a right in accordance with applicable data protection law to have it amended or deleted, to restrict our processing of that data, to stop unauthorised transfers of your personal data to a third party and, in some circumstances, to have personal data relating to you transferred to another organisation. You may also have the right to make a complaint in relation to our processing of your personal data with the Information Commissioner's Office.

If you object to the processing of your personal data, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations.

Your objection (or withdrawal of any previously given consent) could mean that we are unable to perform the actions necessary to achieve the purposes set out above (see 'How we use your personal data') or that you may not be able to make use of the services offered by us. Please note that even after you have chosen to withdraw your consent we may be able to continue to process your personal data to the extent required or otherwise permitted by law, in particular in connection with exercising and defending our legal rights or meeting our legal and regulatory obligations.

We must ensure that your personal data is accurate and up to date. Therefore, please advise us of any changes to your data as soon as possible.

Enquiries, complaints and requests

All enquiries, complaints and requests relating to personal data should be directed to us at our email address info@incasconsulting.com or our main telephone number: +356 9910 8200.

Data controller

The company's IT systems are located within the EEA and North America and controlled by INCAS. INCAS is the data controller in relation to your personal data.

Policy updates

This policy was last updated on 21 October 2024. Any changes to this policy will be notified to you as promptly as possible in accordance with our legal obligations.

ENDS