



Privacy Policy

Of

Alpha Value Management LTD

Dated April 2018

This Privacy Notice complies with Data Protection Legislation. It serves as a notice for those visiting and using the website <http://avm.com.mt>. It notifies the users about the personal data that Alpha Value Management holds relating to their experience in the website, for what purpose it is processed and for how long it is expected to be used.

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Updates and amendments to the Policy

<i>Date of change</i>	<i>Brief description of change</i>	<i>Changed by</i>	<i>Sign off</i>
May 2018	Implementation	Ayrton Stellini	

1. GLOSSARY

Data Protection Legislation means (i) unless and until the General Data Protection Regulation is no longer directly applicable in Malta, the General Data Protection Regulation ((EU) 2016/679) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in Malta and then (ii) any successor legislation to the GDPR or the Data Protection Act (Ch. 440 of the Laws of Malta).

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. 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). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

EXTERNAL THIRD PARTIES

- Service provider acting as processor based in Switzerland who provides IT services.
- Professional advisers based in Malta providing professional services.
- Fraud Prevention Agencies based in Malta and in Italy.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with Data Protection Legislation. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your

personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer (portability) of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

2. INTRODUCTION

Welcome to the Alpha Value Management's (referred to as the "Company", "we", "us" or "our" in this privacy notice) privacy notice.

The Company respects your privacy and is committed to protecting your personal data. This notice will inform you how we look after your personal data when you visit our website and informs you about your privacy rights and how the law protects you.

Please use the Glossary at the end of this privacy notice to understand the meaning of some of the terms used in here.

3. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This privacy notice aims to give you information on how we collect and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter or send us a message through the Talk to us form. It also gives you an insight on the data we process when you call us on the numbers indicated on the website and also when you might send us a CV to consider you for job vacancy we may promote through the website from time to time.

This website is not intended for children and thus we do not knowingly collect data relating to children.

CONTROLLER

The Company is made up of the parent company Alpha Value Management Ltd situated in Malta and its branch bearing the same name in Italy. This privacy notice is issued on behalf of the Alpha Value Management so when we mention the "Company", "we", "us" or "our" in this privacy notice, we are referring exclusively to Alpha Value Management responsible for processing your data. Alpha Value Management Ltd is the controller and responsible for this website.

We have appointed a Data Protection Lead who is responsible for overseeing questions in relation to this provacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Lead using the details set out below.

CONTACT DETAILS

Our full details are:

Full name of legal entity: Alpha Value Management Ltd

Name of Data Protection Lead: Ayrton Stellini & Serena Congedo

Email address: DPL@avm.com.mt

Postal address:

Maltese Head Office: AVM Ltd, No 11 Level 2, Casal Naxaro, Labour Avenue, Naxxar – NXR 9021 – Malta
Italian Branch: AVM Ltd Italy, Via Ariete 18, 47923 Rimini (RN), Italy

Telephone number: + 356 21385851

CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This version was last updated on the 24th of May 2018. We may change this notice from time to time in the future. Changes to our privacy policy will be notified to the data subjects through the preferred means of communication.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

THIRD-PARTY LINKS

We don't have any third-party links on the website.

4. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name.
- **Contact Data** includes email address and telephone numbers.

We do not collect any **Special Categories of Personal Data** about you through our website. Nor do we collect any information about criminal convictions and offences through our website.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

5. HOW IS YOUR PERSONAL DATA COLLECTED?

We only collect data through direct interactions. You may give us your Identity and Contact Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you subscribe to our newsletter, send us emails, fill in the Talk to us forms or call us on the numbers listed in the website

6. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to contact you back on the requests you send us.
- To keep you updated with our newsletter.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to our newsletter at any time by contacting our data protection lead or by unsubscribing from the list from the link made available at the bottom of our newsletter.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

Below you will find a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

To subscribe to our newsletter we need your email address. We consider your subscription to our newsletter as consent from your end.

To answer to your messages sent through to the Talk to us form we require Identity Data and Contact Data. We understand that by sending us this data you are consenting us to use for that purpose only.

To call us we are obliged to record the call. We process this data as required by Markets in Financial Instruments Directive II.

To apply for a job vacancy we process your Identity Data and Contact Data besides other data you provide us with such as that in CV. We need this data to fulfill our obligation as a potential employer and to assess you in relation to our job vacancy.

MARKETING

We do not send any marketing material, either by electronic or postal mail. Should this change we will inform you accordingly and seek your consent to send you such material.

COOKIES

Our website does not make use of cookies.

7. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out above.

- External Third Parties as set out in the [*Glossary*].
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with Data Protection Legislation. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

8. INTERNATIONAL TRANSFERS

Our servers are based at an external third party who is based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

9. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your

personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place 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.

10. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Your Contact Data given to us to mail you the newsletter will be kept by us for as long as you continue giving us your consent by not unsubscribing from the list.

Your Identity Data and Contact Data we receive through the Talk to Us form will only be kept for as long as we continue communicating on the issue you would have raised when you contacted us in the first place unless you decide to engage our services which data we will process for contractual and legal reasons.

Personal data received for job application purposes will be kept for 6 months following the rejection letter if any or for longer if we decide to employ you..

Voice recordings of telephone conversations are kept for ??? as obliged by the Markets in Financial Instruments Directive II.

In some circumstances you can ask us to delete your data: see Request erasure below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

11. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

- be informed
- request access
- request rectification
- request erasure
- restrict processing

- data portability
- object to processing
- withdraw consent

Should you wish to exercise any of the rights above please contact our Data Protection Lead on the email provided above. For in-depth information about each right please see the Glossary below.

You also have the right to complain to a Supervisory Authority. You have the right to complain to the Information Data Protection Commissioner (IDPC) if you feel that we have not responded to your requests to solve a problem. The supervisory authority in Malta is the Office of the Information and Data Protection Commissioner which is at Floor 2, Airways House, Triq il-Kbira, Tas-Sliema and can be reached on 2328 7100.

We would, however, appreciate the chance to deal with your concerns before you approach the IDPC so please contact us on any of the above contact details in the first instance.

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.