

PRIVACY POLICY CARA

This privacy notice aims to give you information on how CARA processes your Personal Data through your use of this Website, including any data you may provide through this Website when completing the AML Return or Register for the first time.

This Website is not intended for children and we do not knowingly collect data relating to anyone under the age of 16

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are processing Personal Data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them. It is designed to also reflect the requirements of the Data Protection Law in the Cayman Islands and the principles of the EU General Data Protection Regulation.

WHO WE ARE (CONTROLLER) AND HOW YOU CAN CONTACT US

CARA can be contacted here:
3rd Floor, Suite 5307
18 Forum Lane, Camana Bay
P.O. Box 12236
Grand Cayman KY1-1010
Cayman Islands

Our Data Protection Compliance Manager

We have appointed a Data Protection Compliance Manager (DPCM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPCM using the details set out below or at info@cara.ky

CARA is a regulatory entity who performs tasks in the public interests of the Cayman Islands. As such, CARA does not formally have to appoint a local EU representative.

THE DATA WE PROCESS ABOUT YOU

Personal Data

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 (together “process”) different kinds of Personal Data about you which we have grouped together as follows:

Identity Data includes first name, last name, or similar identifiers.

Contact Data includes postal address, email address and telephone numbers.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.

Usage Data includes information about how you use our website.

Communications Data includes your choices as well as preferences in receiving information from us and our third parties, your communication preferences, data in social media profiles and social media username, and all information you provide to us via email or the Website or otherwise.

Aggregated Data

We also collect, use and share Aggregated Data such as statistical or demographic data for certain regulatory purposes. Aggregated Data may be derived from your Personal Data but is not considered Personal Data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature.

HOW WE COLLECT YOUR PERSONAL DATA

Direct interactions. You may give us your Identity and Contact Data as well as Communications Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes Personal Data you provide when you:

- Complete forms such as the AML Return;
- subscribe to our publications;
- participate in our activities; or
- request information to be sent to you.
- Automated technologies or interactions. As you interact with our Website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Data by using cookies and other similar technologies. See "COOKIES" below for more information.
- Third parties. We do not collect data from third parties.

Purposes for which we process your personal data

CARA is a regulatory body for firms of attorneys in the Cayman Islands. We process data only to discharge our obligations under the Anti-Money Laundering Regulations and Proceeds of Crime Act.

Cookies

What are cookies?

Cookies" are pieces of information that may be placed on your computer by a service for the purpose of facilitating and enhancing your communication and interaction with that service. There are other technologies with similar purposes, such as beacons or pixels, that we also call "cookies" in this policy.

Which types of cookies do we use?

We use the following types of cookies on the Website:

Strictly necessary Cookies

These cookies are necessary to allow you to browse the Website and use Website functions. Without these cookies the Website would not function properly. These cookies do not collect your Personal Data.

Functional Cookies

These cookies allow websites to remember your chosen preferences (such as your language settings). They allow us to provide you with improved functions. It is not possible for us to personally identify you using the information collected by these cookies.

Performance cookies

These cookies assist us in understanding how visitors interact with the Website by providing information about the visited pages, the time spent on the Website, and error messages in case of technical problems. This helps us to improve the performance of our websites.

We use these cookies only if you have consented via the cookie banner.

Analytical cookies

We use analytical cookies to see, for example, which content on the Website is highly frequented and also to analyse if content should be updated or improved. These cookies are also used to provide you with personalized content based on the pages you have shown interest in.

We use these cookies only if you have consented via the cookie banner.

How do we use cookies?

We may use cookies (and similar items such as clear gifs, web beacons, tags, etc.) on the Website to customize your visit and for other purposes to make your visit more convenient or to enable us to enhance our service. Cookies and similar items are not used by us to automatically retrieve personally identifiable information from your computer without your knowledge.

Google Analytics

This Website uses Google Analytics, a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as "Google"). Google Analytics uses cookies to help a website to analyse how users use the website. The information generated by the cookie about your use of our Website (including your IP address) will be transmitted and stored by Google on servers in the USA.

As the IP anonymization is activated on this Website, your IP address will be truncated by Google within the member states of the European Union or in other states party to the Agreement on the European Economic Area. Only in exceptional circumstances a full IP address will be saved to a Google server in the USA and truncated there. The IP anonymization is active on this Website. Google will use this information on our behalf for the purpose of evaluating your use of this Website, compiling reports on website activity, and providing us with other services relating to the use of this Website and the internet.

You can also block the cookie's collection of data regarding your use of this Website (including your IP address) as well as the processing of this data by Google, by downloading and installing the browser add-on found under the following link:

<http://tools.google.com/dlpage/gaoptout?hl=en>

As an alternative to the browser add-on, you can click this link in order to opt out from being tracked by Google Analytics within this Website in the future. An opt-out cookie will be stored on your device, which means that you will have to click the link above again if you delete your cookies.

You can find more information under the following link:

<http://www.google.com/intl/en/privacypolicy.html>

DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your Personal Data with third parties set out below for the purposes:

- Service providers who provide IT and system administration services.
- Customer Relationship Management (CRM) platforms.
- Email marketing platforms, for regulatory informational purposes only (we will never sell your data or pass it to a commercial entity for their marketing purposes)
- Data collection platforms and
- Analytics providers.
- We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. 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.

INTERNATIONAL TRANSFERS

If and whenever we transfer your Personal Data to a party located out of the Cayman Islands or EU/EEA, we ensure a similar degree of protection is afforded to it by ensuring that appropriate safeguards such as the following are 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.

Where we use certain service providers, we may use specific contracts approved by the European Commission which give Personal Data the same protection it has in Europe (so called Standard Contractual Clauses).

THIRD-PARTY LINKS

This Website may include links to third-party websites, blogs, social media platforms and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not

responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

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.

DATA RETENTION

HOW LONG WILL YOU PROCESS 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 requirements, or until you ask us to delete it. For example:

We will retain your Personal Data concerning marketing and newsletters for as long as you do not withdraw consent.

YOUR RIGHTS

Particularly as a Cayman (or EU user) of our Website, 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. Please keep us also informed if your Personal Data changes during your relationship with 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 local law. 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.
- 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 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.
- 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.

If you wish to exercise any of the rights set out above, please contact us at info@cara.ky

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.

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

This version was last updated on 3 May 2021. We will inform you in advance if we make substantial changes to this privacy notice by e-mail if you are registered with us or on the Website.