

#CG-DPR-GUI-005	PRIVACY NOTICE
Rev 01	CLINGLOBAL CLIENT PRIVACY NOTICE

## 1 PURPOSE AND SCOPE

### 1.1 Introduction

At Clinglobal Ltd and its Partner Companies (referred to as "the Company," "we," "us," or "our"), we value your privacy and are committed to protecting your Personal Data. In accordance with the European Union General Data Protection Regulation (GDPR) and to the relevant local legislation in the country where Clinglobal Ltd or the Partner Companies are respectively incorporated (herein collectively referred to as the "Data Protection Laws"), we want to provide you with clear information on how we handle your Personal Data. This Privacy Notice outlines the types of Personal Data we collect, how we collect and process it, who we may share it with, and the rights you have concerning your data. This Notice applies when we act as a data controller for the Personal Data of our clients and their representatives. As a data controller, we determine the purposes and means of processing your Personal Data.

### 1.2 Who we are

We are an Animal Health Services organization that offers simplified contracting solutions to the animal health industry and community. We specialize in delivering customizable, all-inclusive approaches to animal health research projects and services.

## 2 DEFINITIONS

Data Protection Laws	The relevant local data protection legislation in the country where Clinglobal Ltd or the Partner Companies are respectively incorporated.
Partner Companies	Any related company or entity to Clinglobal Ltd., means of common shareholding which can be classified as a subsidiary, associate or a sister company.
Personal Data	Means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

## 3 PROCEDURES/USE

### 3.1 Personal Data we may collect about you

Personal Data is information that can identify you, including, but not limited to, your name, address, email address, date of birth, identification numbers, and bank details. We collect data based on the specific purpose for which it is needed. We may collect your Personal Data through:

- Direct interactions with you when you use our products or services, correspond with us, or visit our premises.
- Publicly available sources, such as information on your website or other online platforms.

The types of Personal Data that are collected and processed may include:

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Categories of Personal Data	Details
<b>Contact details</b>	First name, surname, address, business address, email address, office phone number, and cell phone number.
<b>Identification details</b>	Identification numbers issued by government bodies or agencies such as your identity card number
<b>Financial information</b>	Bank details

Depending on our collaboration, we may collect other types of Personal Data as required, which will be processed in accordance with this Notice.

### 3.2 How do we use your Personal Data

We only use your Personal Data for the purposes for which it was collected or as agreed with you. We do not use your Personal Data for automated individual decision-making that significantly affects you. The legal basis for processing your Personal Data varies depending on the specific purpose:

Purpose of processing	Legal basis
<b>For payment and billing purposes</b>	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.
<b>For record-keeping</b>	Compliance with a legal obligation, such as internal/external audits and retention periods.
<b>To manage our client relationships, communicate with clients, and maintain records of those communications</b>	Legitimate interests, specifically for the proper management of our customer relationships.
<b>To confirm and verify your identity when you request access, rectification, restriction, or deletion of your information</b>	Compliance with a legal obligation, namely, to verify the identity of a data subject making subject rights requests.
<b>To respond to requests, complaints, comments, or inquiries regarding our services and notify you of service changes</b>	Performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.  Legitimate interests, specifically for the proper administration of our business and communication with users.

In addition to the specified purposes, we may process your Personal Data when necessary to comply with legal and regulatory requirements, as allowed by law, or in connection with legal proceedings.

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### **3.3 Disclosure of personal data**

We generally do not share your personal information with third parties unless we have a lawful basis for doing so. We may share your Personal Data with our Partner Companies and third parties who assist us in managing our business relationship with you. When sharing data, it is done on a need-to-know basis with clear contractual terms and processing instructions.

We may also provide Personal Data to third-party companies that offer software and tools relevant to our business operations (e.g., cloud service providers) under clear contractual terms and processing instructions. In certain circumstances, we may be required to disclose your Personal Data to third parties such as lawyers, consultants, auditors, public and government authorities, or as required by law or for national security, law enforcement, or to protect our rights or the rights of the public.

We ensure that our affiliates, service providers, and third parties maintain the confidentiality of your Personal Data and use it only for the specific purposes for which it was disclosed. We have written agreements in place to ensure compliance with these privacy terms.

### **3.4 International transfers**

We may transfer or store your Personal Data internationally as needed for the mentioned purposes. These transfers are conducted in compliance with the GDPR and Data Protection Laws, ensuring the privacy and security of your Personal Data. Appropriate safeguards are employed, including the use of the European Commission's approved Standard Contractual Clauses for countries with lower data protection levels.

For further details on the transfer of your Personal Data across borders, please contact our Data Protection Officer (DPO) at [dpo@clinglobal.com](mailto:dpo@clinglobal.com)

### **3.5 Personal Data Security**

We are legally obligated to protect your Personal Data. We have implemented security measures to prevent accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access to your data. Our security controls and processes cover access control, encryption, virus and malware protection, firewalls, audit trails, business continuity, backup, and restoration.

When working with third parties, we impose privacy and confidentiality obligations on them to ensure the same level of data protection we maintain. In the event of a suspected data breach, we will notify you and the Data Protection Office as required by law.

### **3.6 Your data protection rights**

Under the GDPR and Data Protection Laws, you have rights we need to make you aware of. The rights available to you depend on our reason for processing your information.

#### **3.6.1 Your right of access to your Personal Data**

You can request a copy of the Personal Data we hold about you. Contact our DPO (see Section 3.8) to make your request, and we will confirm your identity before providing your data. We do not charge a fee for standard requests, but we may do so for unfounded, repetitive, or excessive requests.

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### 3.6.2 Your right to rectification of your Personal Data

You can request updates or corrections to your Personal Data if it is inaccurate or incomplete. Please keep your data accurate and inform us of any changes.

### 3.6.3 Your right to erasure of your Personal Data

You can ask us to delete your Personal Data in certain circumstances, such as when we no longer need it, when you withdraw consent, when you object to processing, or if we have processed your data unlawfully.

### 3.6.4 Your right to restriction of processing

You can ask us to limit how we use your data, or to stop us from deleting it. You may request processing restrictions in specific situations, such as when the accuracy of your data is contested, you object to its use, or we no longer need it.

### 3.6.5 Your right to object to processing

You can object to the processing of your Personal Data in certain situations. We may continue processing in cases where we have compelling legitimate reasons.

### 3.6.6 Your right to data portability

You can request the transfer of your Personal Data from us to another organization or to you, where processing is based on consent or the performance of a contract and is automated.

### 3.6.7 Your right to withdraw consent

You can withdraw consent for processing your personal information at any time. Withdrawal does not affect processing prior to the withdrawal.

To exercise any of these rights, contact our DPO (see Section 3.8). We aim to respond to all requests within one month, but complexity or multiple requests may result in longer response times.

## 3.7 Changes to this Privacy Notice

We may update this Notice periodically to align with best data management practices and legal changes. You can find the updated version on Clinglobal's website.

## 3.8 Contact Details

The primary point of contact for questions relating to this Privacy Notice, including any requests to exercise your legal rights, is our DPO who can be contacted:

- By telephone: (+230) 483 5674;
- By post, to B03/04, The Tamarin Commercial Hub, Jacaranda Avenue Tamarin MU, 90903; or
- By email at [dpo@clinglobal.com](mailto:dpo@clinglobal.com).

The Personal Data we hold about you must be accurate and correct. Please keep us informed if your Personal Data changes during your relationship with us.

If you believe we have not handled your request properly, you have the right to complain to the DPO.

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The procedure to file a complaint with the Data Protection Office is available on <https://dataprotection.govmu.org/Pages/Home%20-%20Pages/Take%20Action/To-report-your-Complaint.aspx>.

#### **4 REFERENCES**

Not applicable

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**APPENDIX A**

**RECORDS RETENTION AND DISPOSAL SCHEDULE**

We are committed to retaining Personal Data only for the necessary duration to fulfill the purposes outlined in this privacy notice. Even after the conclusion of our relationship, the retention periods mentioned in the table below apply:

Purpose	Retention period	Start of retention period
For providing and billing relevant services, as well as for record-keeping	7 years	For the duration of your use of our services and 7 years following the completion of our collaboration.
For managing client relationships and communication with clients and their representatives	7 years	For the duration of your use of our services and 7 years following the completion of our collaboration.
For identity verification when you exercise your data subject's rights	1 year	From the date of request