

## **PRIVACY POLICY**

### **HAREL MALLAC GROUP** **COMMITTED TO** **ACTING FOR THE BETTER**

#### **INTRODUCTION**

At Harel Mallac & Co. Ltd, (hereinafter "**the Company/we/us**"), we care about your personal data and the way in which, it is used.

With this objective, we have devised the present Privacy Policy so that you can confidently enjoy browsing and/or using [www.harelmallac.com](http://www.harelmallac.com) (the "**Website**").

By visiting this Website, you agree and accept the terms of this Privacy Policy.

This Privacy Policy must be read in conjunction with our Data Protection Policy and any ancillary policies and/or codes.

#### **A. GETTING TO KNOW US** **AND WHAT WE DO**

1. The Company respects your right to privacy and is thus committed to fostering a trust-worthy environment when processing your personal data, in line with applicable statutory requirements and this Policy.

2. This Privacy Policy explains to you how we handle and process your personal data that you entrust to us when using this Website.

3. This Policy allows you to take an informed decision before communicating your personal data to us.

4. For the purpose of the Data Protection Act 2017, the Company is considered to be a Data Controller that will ensure the degree of care adopted when treating your personal data.

5. The Company is found within the Harel Mallac Group of Companies ("**Group**" or "**Harel Mallac Group**") (<https://www.harelmallac.com/>) and adopts the Harel Mallac Core Values (ACT- <https://www.harelmallac.com/our-purpose> )

6. If we are processing (in our capacity as Data Processor) personal data by and on behalf of any other entity/ies (Data Controller) within the Harel Mallac Group, this Policy shall be adhered to by that entity/those entities as well.

#### **B. GETTING TO KNOW YOU:**

1. So, how do we collect from you your personal data?

When browsing our Website, we will invite you to take a moment to consult this Policy and provide to us your name and contact details and other relevant information about yourself and/or your firm.

2. We collect personal data from you when, you register on our Website, subscribe to our newsletter, respond to a survey, undertake a transaction, apply for a job vacancy

within the Harel Mallac Group and/or fill out any form on the Website. However, you also have the choice to simply browse this Website without providing any of your personal data to us.

**C. HOW YOUR PERSONAL DATA IS USED:**

1. We are committed to using your personal data for the sole purpose for which, you have entrusted same to us. This purpose will be clearly provided to you upon collection of your personal data i.e. in the contact form or for any application, order and/or payment transaction (if available on the Website). Please ask to consult our retention policy regarding the periods of time during which we hold on to your personal data.

2. Job Applications:

2.1. The Website usually displays job vacancies that are available within the Harel Mallac Group. Where you use the Website to effect an application for a job vacancy or submit your personal data for future job opportunities through the Website, your personal data will be received:

- i. in a Harel Mallac Group mailbox administered by the Company and such data shall be processed by the Company, as data controller (if the job vacancy is at the Company or for future job opportunities) and/or as data processor, where the Company will transmit your personal data to the relevant Group entity/data controller; and/or
- ii. in the mailbox of the entity/data controller within the Harel Mallac Group to whom your job application is being addressed.

If by error, you submit your personal data for a job (a vacancy or future job opportunity) through our social media forums such as (without limitation) Facebook or LinkedIn, you will be asked to direct same to the said Harel Mallac Group mailbox or the mailbox of the entity/data controller within the Harel Mallac Group to whom your job application is being addressed and Clause 2.1 shall apply. Such personal data submitted on our social media forums such as (without limitation) Facebook or LinkedIn, will thereafter be purged. If job applications are requested to be submitted through our social media forums such as (without limitation) Facebook or LinkedIn, the processing of your personal data will be subject to the terms and conditions of those social media forums (please consult same) and this privacy notice.

2.2. Once the Company has conveyed emails and personal data received in the said Harel Mallac Group Mailbox to relevant persons as per Clause 2.1 above, those emails will be purged. Such personal data may continue to be processed by the Company and the other entities within its Group where you provide your specific consent for them to keep your personal data on file for up to two (2) years for any future job possibilities in the Harel Mallac Group. After the said two (2) years, your said personal data shall be erased, unless there is another lawful ground to continue processing same.

2.3. As part of the recruitment process, your personal data will be processed and you may be requested to conduct a psychometric assessment, which involves automated processing of certain of your personal data and which may be used in

the selection process. By participating in the psychometric assessment, you explicitly consent to the automated processing of your personal data and reliance thereupon for selection purposes. The retention policy in Clause 2.2 above shall also apply to this assessment and its results (subject to Clause 2.4 below).

2.4. If your candidature is successful, your personal data, including any psychometric assessments conducted during screening, shall be kept on record for the purposes of your contract of employment/traineeship etc. If your candidature is unsuccessful, your personal data shall be erased **unless** you provide your consent to keep your personal data on file for up to two (2) years for any future job possibilities in the Harel Mallac Group or there is another lawful ground to continue processing same.

2.5. After employment or traineeship etc. personal data shall be kept on record in order to comply with statutory requirements, for the purposes of defending and/or exercising any legal rights and/or where there is any other lawful basis to continue processing such personal data, whichever is the longer.

2.6. Any third party data processor that has been appointed to administer our Website and/or social media forums are bound by confidentiality and/or the Data Protection Policy and ancillary policies of the Harel Mallac Group.

2.7. **For job applications deposited at or posted to our offices, the above shall equally apply in those cases.**

### 3. Other use:

3.1. However, once making your acquaintance, we would like to keep in touch with you and use your personal data:

- ❖ To personalise your experience  
(your information helps us to better respond to your individual needs);
- ❖ To improve our website  
(we continually strive to improve our website offerings based on the information and feedback we receive from you);
- ❖ To improve customer service  
(your information helps us to more effectively respond to your customer service requests and support needs);
- ❖ To administer a survey or other site feature;
- ❖ To send to you latest offers and promotions regarding the different products and services of the Company and any affiliate within the Harel Mallac Group.

3.2. Use of your personal data for **other** purposes is only a click away! Rest assured that you will be invited to tick a box, consenting to use of your personal data for other purposes such as marketing, surveys, customer satisfaction etc.

3.3. Your personal data may be processed and used by different companies within the Harel Mallac Group and/or consultants of the Company for such other purposes for which you provide your explicit consent and/or as permitted under law e.g. for defending or enforcing legal rights. We do not sell and/or trade in any personal data collected on this Website.

3.4. We implement a variety of security measures to maintain the safety of your personal data on the Website.

#### 4. Are you happy for us to use Cookies?

Our Website uses cookies. We use cookies to gather information about your computer for our services and to provide statistical information regarding the use of our Website. **Such information will not identify you personally** - it is statistical data about our visitors and their use of our Website. This statistical data does not identify any personal details whatsoever. We may also gather information about your general Internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer, as cookies contain information that is transferred to your computer's hard drive. They help us to improve our Website and the service that we provide to you. All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our Website.

#### **D.HOW WE CARE:**

1. You can transmit your personal data through this website securely.

2. We have devised and implemented certain security policies, rules and technical measures in order to protect the personal data that you have entrusted to us, namely by the following:

- ! Unauthorised access
- ! Improper use or disclosure
- ! Unauthorised modification
- ! Unlawful destruction or accidental loss
- ! Confidentiality obligations of our data processors.

3. We equally care about the personal data of children i.e. those below the age of 16. Young ones may be interested in participating in one of our competitions for example. Parents or legal guardians of a child will be called upon to provide their consent to the processing of any personal data of the child.

4. We only keep your personal data for as long as needed, that is, for as long as required under law, or for the purposes of any lawful processing, whichever is the longer.

#### **E. LET'S CHECK:**

Your access:

You are free to ask us what personal data we hold on you and why. Just send us an email at [communication@harelmallac.com](mailto:communication@harelmallac.com) and our Data Protection Officer will check and let you know.

We may need to ask you a few questions in order to ensure that the request is actually coming from you!

#### **F. KEEP US UP TO DATE:**

Please do keep us up to date on any changes to your personal data.

#### **G. YOUR RIGHT TO SAY 'NO':**

1.You have the opportunity to withdraw your consent and/or rectify and/or erase any personal data or put a stop to the way that your personal data is being used, provided that there is no other lawful purpose (not requiring consent) for which such data is required to be processed.

2.Complaints regarding any breaches of this Policy and/or contraventions of the applicable data protection laws and regulations in force may be reported to our Group Data Protection Officer or the divisional Data Protection Officer (contact details mentioned below) or to the Data Protection Commissioner in Mauritius ([dpo@govmu.org](mailto:dpo@govmu.org)).

#### **H. LINKING YOU TO OTHERS**

1.Our website may contain links to the websites of third parties, so as to broaden your experience.

2.These third party websites have separate and independent privacy policies. We therefore have no control over these websites and/or liability for their content and/or products, goods, services and/or activities.

3.However, we care about the users of our website and welcome any feedback about any third party websites linked from our website.

#### **I. HOW THIS POLICY APPLIES TO YOU**

1.This online Privacy Policy applies only to your personal data collected through our website and not to information collected offline, unless otherwise is specifically stipulated in this policy.

2.However, irrespective of the way in which, your personal data is collected, we are committed to caring for your personal data in accordance with all applicable laws and regulations in force.

#### **J. TERMS GOVERNING OUR WEBSITE:**

Please also visit our Terms and Conditions section governing the use of our website at: <https://www.haremallac.com/terms-and-conditions>

#### **K. KEEPING YOU UP TO DATE:**

[Changes to our Privacy Policy](#)

If we decide to change our privacy policy, we will post those changes on this page.

#### **L. KEEPING IN CONTACT:**

If there are any questions regarding this Privacy Policy you may contact us via our contact details below:-

Name: Harel Mallac & Co. Ltd (Data Controller)  
C/O Data Protection Officer,  
Address: 18 Edith Cavell Street, PO Box 36, Port Louis 11302  
Tel: (+230) 207 3000  
Fax: (+230) 207 3030  
Email: [HMCO\\_dpo@haremallac.com](mailto:HMCO_dpo@haremallac.com)

Name: Harel Mallac Group Data Protection Officer,  
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