

MAP IT LIMITED
PRIVACY POLICY

WHO WE ARE

MAP IT Limited (*'we' or 'us' or 'our'*) gather and process your personal information in accordance with this Privacy Policy and in compliance with the relevant data protection Regulation and laws. This Policy provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Our registered office is at 9, Level 3, Triq Papa Urbanu VIII, Birkirkara, BKR1425, Malta and we are a company registered under the laws of Malta having company registered number C 67687. We have a Designated Data Manager who can be contacted at dpo@mapitalta.com.

INFORMATION WE COLLECT

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We do not collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this Policy.

THE PERSONAL DATA THAT WE COLLECT IS THE FOLLOWING:

- Name;
- Email Address;
- Mobile Number;
- IP Address;

WE COLLECT DATA USING THE FOLLOWING METHODS:

- Online form upon registration – provided by yourself, even prior to confirming the trial;
- Documents uploaded to the Website – provided by yourself;
- Server logs;
- Information provided by our processors and their sub-processors, if any.

HOW WE USE YOUR PERSONAL DATA

We take your privacy very seriously and we do not disclose, share or sell your data without your consent – unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time.

THE PURPOSES AND REASONS FOR PROCESSING YOUR PERSONAL DATA ARE DETAILED BELOW:

- **Provision of our services:** We collect your personal data which is necessary to provide the services which include logging into our platform, or to facilitate connection between yourself and other third parties;
- **To manage our business needs:** We carry out analysis to improve our service and the relative performance and functionality;
- **Marketing:** We will occasionally send you marketing information where we have assessed that it is beneficial to you as a customer and in our interests. Such information will be non-intrusive and is processed on the grounds of legitimate interests;
- **Communication with the User:** We use the information to be able to respond to you when you contact us and to communicate more information on our Service and related products;
- **Compliance:** To comply with our obligations and to enforce the terms of our websites and services – this includes safety and security needs such as verification of accounts or prevention against misconduct, whether we share with law enforcement, government agencies, or otherwise;
- **Regulatory Obligations:** We collect and store your personal data as part of our legal obligation for business accounting;
- **Transfer of Information:** We transfer some personal data to our processors, when required, in order to provide our services;
- **Affiliates and Acquirors of our business or assets:** We may share your information with affiliates under common control with us, who are required to comply with terms of confidentiality of information even with regards to your information. If we become involved in a takeover, securities offering, bankruptcy, reorganization, dissolution or similar transaction, we may share or transfer your information in connection with such transaction.

YOUR RIGHTS

You have the right to access any personal information that we process about you and to request information about:

- What personal data we hold about you;
- The purposes of the processing;
- The categories of personal data concerned;
- The recipients to whom the personal data has/will be disclosed;
- How long we intend to store your personal data for;
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to correct it as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (*where applicable*) in accordance with the data protection laws; as well as to object to any direct marketing from us; to exercise your data portability rights, and to be informed about any automated decision-making we may use.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

SHARING AND DISCLOSING YOUR PERSONAL INFORMATION

We do not share or disclose any of your personal information without your consent, other than for the purposes specified in this Privacy Policy, where there is a legal requirement or where such is required to perform the services requested by you. Should we rely on processors, all processors acting on our behalf are contractually bound to only process your data in accordance with instructions from us and comply fully with data protection laws and any other appropriate confidentiality and security measures.

SAFEGUARDING MEASURES

We take your privacy seriously and take every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorized access, alteration, disclosure or destruction and have several layers of security measures in place, including but not limited to:

- *SSL*
- *Password hashing*
- *Firewalls*
- *Antivirus/malware*

TRANSFERS OUTSIDE THE EU

Personal data in the European Union is protected by the General Data Protection Regulation (GDPR) but some other countries may not necessarily have the same high standard of protection for your personal data. Sometimes we may have to share your data with third party processors which are based outside of the EU, however, when we do so, we will ensure that this is done under an adequacy decision or under standard contractual clauses approved by the EU Commission.

CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your personal information to us, however, as this information is required for us to provide you with our services, we will not be able to offer some/all our services without it.

HOW LONG WE KEEP YOUR DATA

We only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We keep your personal data for a minimum of ten (10) years after which time it will be destroyed. Nonetheless, other shorter or longer period may apply, on the basis of documented policies and procedures drafted on the basis of retaining personal information strictly as long as is necessary.

Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

MARKETING

CONSENT EXAMPLE

Occasionally, we would like to contact you with regards to certain services or promotions that we provide. If you consent to us using your contact details for these purposes, you have the right to modify or withdraw your consent at any time by using the opt-out/unsubscribe options or by contacting us directly.

*If you **consent** to us contacting you with the above-mentioned marketing and offers, please tick to say how you would like to be contacted:*

Post Email Telephone Text Message (SMS) Automated Call

LEGITIMATE INTERESTS EXAMPLE

*We will occasionally contact you with regards to certain services or promotions that we provide by **[email/SMS/post]** that have been identified as being beneficial to our customers and in our interests. Such information will be relevant to you as a customer and is non-intrusive and you will always have the option to opt-out/unsubscribe at any time.*

*If you would prefer **not** to receive above-mentioned marketing and offers, please tick below:*

I wish to opt-out of marketing

LOGGING A COMPLAINT

We only process your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a

complaint with ourselves so that we will try to rectify any mishandling of your data or with the supervisory authority, should you require.

You may contact us as follows:

dpo@mapitmalta.com

You may contact the supervisory authority as follows:

Office of the Information and Data Protection Commissioner

Level 2, Airways House, High Street, Sliema, SLM1549, Malta

T: +356 2328 7100

E: idpc.info@idpc.org.mt