

## **General Data Protection Regulations**

The scope of this policy statement extends to all Group activities. It covers all Group sites and offices, in the Isle of Man, Brazil and Singapore, as well as all its subsidiaries, which include:

Valeberg Ltd  
Valeberg Capital Ltd  
Valeberg Commodities Ltd  
Valeberg Ecosolutions Ltd  
Valeberg Engineering Ltd  
Valeberg Property Management Ltd  
Valevox Ltd

The Valeberg Group of Companies is committed to delivering a quality product and or professional service to all our customers. To enable us to do this and to comply with the General Data Protection Regulations, which have come into effect, we are required to inform you of what data we hold pertaining to you, your Company or organisation, and how we use such information. Valeberg is registered under the Isle of Man Data Protection Act 2018.

At Valeberg, we are dedicated to safeguarding your privacy when you visit our site or communicate electronically with us. This Privacy Policy, together with our Website Terms and Conditions, provides an explanation as to what happens to any personal data that you provide to us, or that we collect from you. It is important that you read our Privacy Policy together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are fully aware of how and why we are using your data. This Privacy Policy supplements the other notices and is not intended to override them. We update this Policy from time to time, so please review it regularly.

### **Controller**

We, Valeberg, are the Controller of all Personal Data relating to our personnel and personal data used in our business for our own commercial purposes (collectively referred to as "we", "us" or "our" in this privacy notice). We have appointed a data protection officer (DPO) who is responsible for overseeing matters relating to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

### **Contact details**

Name of DPO: **Darren Harris**

Email address: **Legal@valeberg.im**

Postal address: **Old Castletown Road, Braddan, Isle of Man, IM4 1BB**

You have the right to make a complaint at any time to the Information Commissioner, the Isle of Man supervisory authority for data protection issues ([www.inforights.im](http://www.inforights.im)). We would, however, appreciate the opportunity to address your concerns before you approach the Information Commissioner, so please contact us in the first instance.



## Information We Collect

In operating our website, we may collect and process the following data about you: details of your visits to our website and the resources you access, including, but not limited to, traffic data, location data, weblogs, and other communication data. Information that you provide by filling in forms on our website, such as when you registered for information. Information is provided to us when you communicate with us for any reason.

## Use of Cookies

On occasion, we may collect information about your computer to provide our services and to generate statistical information about the use of our website. Such information will not identify you personally; it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever. Similarly to the above, we may 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 can decline cookies. This can be done by activating the setting in your browser that lets you decline cookies. Please note that if you decline cookies, you may be unable to access certain parts of our website.

## Use of Your Information

The information we collect and store about you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

To provide you with information requested from us, relating to our services. To provide information on other services which we feel may be of interest to you, where you have consented to receive such information.

- To meet our contractual commitments to you.
- To notify you about any changes to our website, such as improvements to our services.

If you are a new client, we will contact you only after you have provided consent and only by the means you consented to.

Please be advised that we do not disclose information about identifiable individuals to any third-party service provider, but we may, on occasion, provide aggregate statistical information about our visitors. You can ask us to stop sending you marketing messages at any time by following the opt-out links in any marketing message sent to you or by contacting us. Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

## Storing Your Personal Data

The data we receive is stored on our secure servers. Details of any transactions entered into on our site will be encrypted to ensure their security. The transmission of information via the internet is not completely secure; therefore, we cannot guarantee the security of data sent to us electronically, and its transmission



is entirely at your own risk. Where we have given you (or you have chosen) a password to access certain parts of our site, you are responsible for keeping it confidential.

### **Third Party Links**

You may find links to third-party websites on our website. These websites should have their own privacy policies, which you should check. We do not accept any responsibility or liability for their policies whatsoever, as we have no control over them.

### **Your Rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please contact us to find out more about these rights:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to the processing of your personal data.
- Request the restriction of processing your personal data.
- Request the transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact the DPO using the contact details above. 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.

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 anyone who does not have the right to receive it. We may also contact you to request further information regarding your request to expedite our response. 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 if you have made multiple requests. In this case, we will notify you and keep you updated.

### **Contacting Us**

We welcome any queries, comments or requests you may have regarding this Privacy Policy. Please do not hesitate to contact the DPO using the contact details above.



#### **Darren J Harris**

Founder / Managing Director  
For and on behalf of Valeberg Group of Companies

