

# WEBSITE PRIVACY POLICY

This privacy statement sets out the Privacy Policy ("Policy") of www.ansbacher.bs (the "Website").

The Website provides a portal to the financial services offered by Ansbacher (Bahamas) Limited (the "Bank" or "Ansbacher"). The Website is owned by Ansbacher (Bahamas) Limited.

By accessing the Website you accept this Policy.

If you do not agree to this Policy, do not proceed to further web pages of the Ansbacher (Bahamas) Website.

Ansbacher is committed to protecting and respecting your privacy. This Policy (together with the Website Terms of Use and any other documents referred to in it) sets out the basis on which any personal data the Bank collects from you, or that you provide to the Bank, will be processed by the Bank. Please read the following carefully to understand Ansbacher's views and practices regarding your personal data and how the Bank will treat it.

For the purpose of the Data Protection (Privacy of Personal Information) Act ("Act"), the data controller is Ansbacher (Bahamas) Limited, located at 308 East Bay Street, Nassau, Bahamas.

## 1. Privacy

This privacy statement sets out the Bank's current policies and demonstrates its commitment to your privacy. This Policy may be updated from time to time. Ansbacher therefore asks you to consult it on a regular basis. Visiting the Website on a regular basis and your continued access to it, represents your agreement to changes in the Policy.

## 2. Information Ansbacher may collect from you

The Bank may collect and process the following data about you including, but not limited to:

- Information that you provide by filling in forms on the Bank's Website;
- Up-to-date data about yourself, if you register your personal details;
- Details of your visits to the Website (including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access);
- Information about your use of the Website;
- Information that you provide for the purpose of registering with the website;
- Information about transactions carried out over the Website;
- Information that you provide for the purpose of subscribing to the website services; and
- Any other information that you send to the Website.

Ansbacher may also ask you for information when you report a problem with the Website. If you contact Ansbacher, it may keep a record of that correspondence. The Bank may also ask you to complete optional surveys that it may use for research purposes.

## 3. IP addresses

The Bank may collect information about your computer (or mobile device), including where available your IP address, operating system and browser type, for system administration or for the Bank's own commercial purposes. This is statistical data about the Bank's users' browsing actions and patterns.



## 4. Collection of information & Cookies

The Website uses tracking technology such as cookies or tags to gather information collected to understand how visitors use the Bank's Website.

Tracking technology helps Ansbacher to manage and improve the usability of the Website, for example by detecting whether there has been any contact between your computer and the Bank in the past and to identify the most popular sections of the Website.

When you save your cookie settings, they should also apply to your future visits to the Website. However, for technical reasons beyond the Bank's control, this cannot be guaranteed. For example, if you reset your browser, delete your cookies or access the Bank's Website from another browser or device your cookie settings may be lost. To comply with applicable laws and regulations, in some countries you may be asked to confirm your cookie settings when you first visit the Website. If you are in a country where you are automatically required to set your cookie settings, you may be asked to set them again on a future visit.

In many cases you can also control tracking technologies using your browser. Please ensure that your browser setting reflects whether you wish to be warned about and/or accept tracking technologies (such as cookies) where possible. The specific capabilities of your browser and instructions on how to use them can usually be found in the manual or help file of your browser.

Refusing, disabling or deactivating of tracking technologies may result in a reduced availability of the services provided by the Website or parts of the Website may no longer function correctly.

## 5. Where Ansbacher stores your personal data

The data that the Bank collects from you may be transferred to, and stored at, a destination outside the Commonwealth of The Bahamas. The data may also be processed by staff operating outside the Commonwealth of The Bahamas who work for Ansbacher or its affiliated companies. Such staff may be engaged in, among other things, the fulfilment of your order, the processing of your payment details and the provision of support services. By submitting your data, you agree to this transfer, storing and/or processing. The Bank will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Ansbacher maintains strict security standards and procedures with a view to preventing unauthorised access to your data by anyone, including its staff. The Bank uses leading technologies such as (but not limited to) data encryption, firewalls and server authentication to protect the security of your data.

## 6. Electronic Messages

All electronic messages sent to and from Ansbacher are automatically retained which preserves the evidential weight of the e-mails. They are protected by reasonable technical and organisational measures and may only be accessed in justified cases in line with applicable laws and regulations (e.g. court order, suspicion of criminal conduct, violation of regulatory obligations, material breach of employment contract) to specific persons in defined functions (e.g. Legal, Compliance,

Risk). Every step of the process, as well as the search criteria used, are logged in an audit trail. All emails are disposed of after the applicable retention period has expired.

## 7. Risks of sending data over the Internet

The Internet is generally not regarded as a secure environment, and information sent via the Internet (such as to or from the Website or via electronic message) may be accessed by unauthorised third parties, potentially leading to disclosures, changes in content or technical failures. Even if both sender and receiver are located in the same country, information sent via the Internet may be transmitted across international



borders and be forwarded to a country with a lower data protection level than exists in your country of residence.

Please note that Ansbacher accepts no responsibility or liability for the security of your information whilst in transit over the Internet to Ansbacher. In order to protect your privacy Ansbacher would like to remind you that you may choose a secure means of communication with Ansbacher, where you deem it appropriate.

## 8. Use made of the information

The Bank uses information held about you in the following ways including, but not limited to the following:

- To ensure that content from its Website is presented in the most effective manner for you and for your computer (or mobile device);
- To provide you with information, products or services that you request from the Bank or which the Bank feels may interest you, where you have consented to be contacted for such purposes;
- To carry out the Bank's obligations arising from any contracts entered into between you and the Bank;
- To allow you to participate in any interactive features of the Bank's Website, when you choose to do so; and
- To notify you about changes to the Bank's Website.

The Bank may also use your data to provide you with information about goods and services of Ansbacher which may be of interest to you and Ansbacher may contact you about these.

## 9. Disclosure of your information

The Bank will not share your personal information with entities outside of Ansbacher.

The Bank may disclose your personal information to third parties in the following situations:

- In the event that the Bank sells or buys any business or assets, in which case the Bank may disclose your personal data to the prospective seller or buyer of such business or assets
- If Ansbacher or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets
- If the Bank is under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Bank's Website Terms and Conditions and other agreements or to protect the rights, property, or safety of Ansbacher, its customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

## 10. Your rights

You have the right to ask the Bank not to process your personal data for marketing purposes.

Ansbacher will usually inform you (before collecting your data) if it intends to use your data for such purposes or if it intends to disclose your information to any third party for such purposes.

## 11. Links

The Bank's Website may, from time to time, contain links to and from the websites of the Bank's partner networks, advertisers and affiliates ('Third Party Sites'). If you follow a link to any of these Third Party Sites, please note that these Third Party Sites have their own privacy policies and that Ansbacher does not accept



any responsibility or liability for these policies. Please check these policies before you submit any personal data to these Third Party Sites.

## 12. Access to information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee to meet the Bank's costs in providing you with details of the information it holds about you.

## 13. Changes to the Bank's Privacy Policy

Any changes the Bank may make to its Privacy Policy in the future will be posted on this page.

#### 14. Contact

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed via the <u>Contact us</u> link.

Ansbacher knows that you are concerned with how your personal and financial information is dealt with. This privacy statement sets out the Bank's current policies and demonstrates its commitment to your financial privacy. The Bank may change the content or services found on its Website at any time without notice, and consequently the Bank's Policy may change at any time in the future.

In this Policy:

"Content" means all pages, screens, information and materials included in or accessible through this Website (including any content available on any email or SMS services).

"you", "your" and "yours" means you, the person(s) accessing this Website and the party on whose behalf you are doing so.

Ansbacher (Bahamas) Limited includes its subsidiaries and associated companies from time to time.