



**CITEX**  
**International Trade**

# Citex Privacy Policy



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## **Citex Privacy Policy**

Citex is committed to protecting all personal information and therefore all personal data collected is processed, stored and shared in full compliance with this policy.

Definitions:

- 'Personal Information' means any information relating to an identifiable person who is directly or indirectly identified in reference to an identifier. This defines a wide range of personal identifiers to constitute personal data, including name, identification number, location data and/or online identifier
- 'Sensitive Personal Data' relates to the personal information stating racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. And the processing of genetic data, biometric data concerning a natural person sex life or sexual orientation

### **What personal information we collect about you and why?**

We may collect and generate information about you including your name, contact details, and date of birth.

We process your information to fulfill our contractual obligations with you and be able to conduct various business activities with you. We also process personal data to comply with all relevant international laws, to conduct sufficient due diligence to ensure our business dealings are performed in the highest regard to appropriate and ethical standards. We may use your information to comply with legal, regulatory and other necessary requirements to operate our business with you. Data may be also used to perform internal audits, data analysis, statistical, research purposes, troubleshooting, and to monitor activities permitted and/or required by local and international law and/or regulation.

## **When we disclose your information**

We do not share your information with non-affiliated entities for marketing purposes.

We do, however, share your information as per the following:

- With our Affiliates. As permitted by law, we may share your information without partnered and trusted affiliates. These entities may market their business, products, and services to you, and their use of your information will be governed by this policy.
- Partners and Financiers. We may provide your information to carefully audited entities that work on our behalf and with us in our business activities. Only trusted companies who require the use of your information for applied business purposes are given access to it.
- Service providers. We may share your information with other third-party service providers in order to enable them to assist us in conducting our business dealings with you. These third parties will process your data on our behalf (as our processor). We will disclose your personal data to these entities so that they can perform those functions. Before we disclose any personal data to other people/entities, we will ensure that they have the appropriate security systems in place to protect your personal data. When contracting with such third-party Service Providers, we will be in a legally binding contract with this entity imposing appropriate security standards on them, particularly with respect to managing your personal data.

Third Parties We may share your information with include:

- Professional advisors and consultants including accountants and legal advisors.
- Banks and payment processors in relation to business conducted with us
- IT support, website and data hosting providers and administrators
- Analytics and search engine providers
- Courts, court-appointed persons/entities, receivers and liquidators
- Business partners and joint ventures
- Insurers
- Governmental authorities, statutory and regulatory bodies.



In the following circumstances we may also share your information:

- To protect us and others. We may also disclose information that we collect from you where necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of agreements, situations involving potential threats to the safety of any person, or as evidence in litigation in which we are involved in.
- In response to the legal process. We may disclose your information collected from you in order to comply with the law, a judicial proceeding, court order or other legal and regulatory processes, such as in response to a court order.
- Aggregate and anonymous information. We may share aggregate or anonymous information about users with third parties for research and/or similar purposes
- Legal purposes. To enforce our terms and conditions; to protect the security of our business activities and the security of our services when we believe that disclosure is necessary to protect our rights.

## **Information Sharing within Citex**

As a company that indulges in business across the world, Citex has affiliates and business partners around the globe which we may need to share your information with. Circumstances under which we may share your information in this manner include:

- Where support and functions are provided by other companies, such as in relation to our website hosting and operation, IT systems and support and maintenance
- To meet our customers demands by providing services across different offices/ locations
- For authorisations/ approvals with relevant decision-makers
- For reporting purposes
- Where systems and services are provided on a shared basis, such as compliance and for the arrangement of business visas

Access rights between members of the Citex company are limited and are granted only on a need-to-know basis, depending on job function and role.

## **Legal Basis for Processing**

We have a legal basis to collect, use and share your information. We will only collect and process information when we have a legal basis to do so. Legal basis includes consent (where you have given consent), contract (where processing is necessary to fulfill contractual obligations (e.g structuring contracts for the commodities & services you have purchased))

## **Data Retention**

We retain your information while you use our services/ after you use our services and/or needed to conduct our business and to meet the regulatory, legal and accounting requirements. This includes data you or others provide to us and data generated or coinciding with our business with you.

## **Security**

Citex takes the security of all data, especially in relation to personal information, very seriously. We have/ will continue to do our best to protect your information from any unauthorised access or loss by implementing security systems and procedures. You should, however, be aware that the transmission of information via the internet is never completely secure. You should take the necessary precautions to protect against unauthorised access to your passwords, phone, and computer. We are not responsible for any lost, stolen or compromised passwords or for any activity that's conducted as a result of unauthorised password activity.

## **Transfer to countries that do not provide an adequate level of protection**

Citex is a global company and collects information from or about you within the European Economic Area ['EEA'] which may be transferred across international borders and to countries outside of the EEA that do not have laws requiring a reciprocal level of data protection. We as a data controller (or data exporter) will do out utmost to ensure that your information is protected no matter where it is transferred. To ensure appropriate protection is in place we enter into a data processing agreement with our suppliers processing your information outside of the EEA. When necessary we utilise standard contract clauses to ensure the adequate protection of your information.

## **Third-Party Website**

Citex may contain links to and from the websites of our partnered networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies; we do not accept any responsibility or liability for their respective policies.

## **Your rights as a data subject**

Each Data Subject has the possibility to impact how your personal information is processed:

- Request access to your information that we process
- Request for your information to be deleted or for your right to be unsubscribed (right to erasure)
- Request us to correct or change your information
- Limit, restrict or object to our use of your information
- Subject to applicable law, lodge a complaint with your local data protection authority

Please note that if you request us to remove your information, we may retain some information for the purpose of resolving disputes, troubleshoot problems, and to comply with a law or regulation. Moreover, some information is never completely removed from our databases because of technical constraints and the fact that regular backups are made on our systems. Therefore, not all of your personal information can ever be completely removed.

Citex's Privacy Policy may be updated or revised without notice and as such we encourage you to review it periodically.