

## **Privacy Policy**

### **A. Introduction:**

This Privacy Policy is issued by **Robertson Finance Inc** (hereinafter the “**Company**”, “**we**”, “**us**”, “**our**”, “**Robertson**”) and it concerns the use of our website robertsonfinanceinc.com (hereinafter the “**Site**”) by visitors who are natural persons including current or potential customers of the Company or act as authorized representatives of legal entities (together, “**you**”, “**your**”, “**visitors**”).

The Company respects your privacy and is committed to handling your personal data with transparency and integrity. The Company acts as a controller of your personal which means that it determines solely or jointly with others, the purposes and means of the processing of your personal data.

This Privacy Policy describes the types of personal data we collect about you from landing or using our Site, how we will use your personal data, the collection and transferring process as well as the retention period. It also provides your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

For the purposes of this Policy, ‘personal data’ means any information relating to you that identifies you, directly or indirectly. ‘Processing’ means any operation or set of operations that are performed on personal data, such as collection, recording, storage, use, disclosure, erasure, or destruction.

It is clarified that this policy does not govern the privacy practices related to our products and services other than the Website itself. If you have any questions or concerns relating to the processing of personal data by **Robertson**, you can use the contact information available on our website [here](#).

### **B. Personal Data We Collect:**

We collect personal data since the landing on our website and from completing the online contact form available on our Site. Personal data are also collected in case you decide to contact the Company using the contact details available on our Site. Personal data we may require you to provide or/and collect includes your full name (first name, surname, and middle name if available), and contact details (telephone, email).

It is your responsibility to provide complete, accurate, and correct details and you hereby confirm the details you provided are correct. We note that the provision of personal data to the Company is not mandatory by the applicable legal framework. However, the provision of false, incorrect, or outdated information or partial information may affect or restrict our ability to contact you back or to offer you the requested service.

Submitting of Personal Information belonging to another person other than you, will be treated as submitted by his representative and warrant that you receive the other person’s explicit consent to provide these details to the Company on his behalf and use them according to this Policy.



The Company may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more. Additionally, the Company may collect or use the assistance of third parties to collect and analyze anonymous, statistical or aggregative information related to your use of the Website.

**Robertson** does not provide any services to children, nor processes any personal data in relation to children, where 'children' are individuals who are under the age of eighteen (18).

### **C. Use of collected Personal Data:**

Collected information contributes to the development and further improvement of the products and services available on our Site. In line with this, collected data helps us to enhance the content on the Site and to deliver more personalized content, services, and products.

Personal data may be also used to contact you either by the Company or by any other person acting on our behalf, via email or phone. Such contacts will be made for the provision of information related to our services and products that may be of interest to you or your business. Moreover, personal data will be used to conduct research surveys, and other similar activities related to our products and services. We can only use your personal data to promote our products and services to you if we have your explicit consent to do so or, in certain cases, if we consider that it is in our legitimate interest to do so. To opt out from receiving marketing information from us you can contact us at any time at [info@robertsonfinanceinc.com](mailto:info@robertsonfinanceinc.com).

All the information we collect assists us with client profiling/segmentation, and statistical analysis. Collected data may be used for promotions and other marketing services and products subject to your exercise of the opt-out right. Analytical and statistical information developed via the collection of personal data may be provided to third parties. This information will not identify you personally. The collected information used by the Company for these purposes will be mainly statistical information and will not identify you personally.

Your personal data will be used for the purposes specified in this Policy or our [Terms of Use](#) available on our website.

### **D. Transferring of Personal Data to third parties:**

In the course of our business and for legitimate business purposes, your personal data may be shared with some or all of the categories below:

- a) Third Service Providers including auditors, lawyers, consultants/advisors third parties who assist us with the effective provision of our services by offering technological expertise, solutions, and support, and other service providers who may engage with us to assist us with our Site maintenance and enhancement. We may also transfer your personal data with service providers to facilitate our email communications with you;
- b) Group Entities (companies that we control, control us, or are under common control with us, whether directly or indirectly);

- c) In any case of dispute, or legal proceeding of any kind involving you with respect to the Site we may share your personal information with attorneys, courts, and any other party relevant to such proceedings;
- d) With government bodies, component and law enforcement authorities and organisations in case we were requested in the course of an investigation;
- e) We may share your personal information with categories of persons in c) and d) if we identify that you abused your rights to use the Site, or violated any applicable law, if it is necessary or justified;

In any case, other than the above, your personal information will be shared with others only if you provide your explicit prior consent.

#### **E. Transfer of data outside EU**

We may process your personal data in countries where the applicable standards and laws may be of a lower protection than those of your country. In this respect, we will take measures to ensure that your personal data receives an adequate level of protection. In case you reside within the European Union and your personal data is transferred to a service provider for processing in any country outside the EEA, that is not recognized by the EU Commission as providing an adequate level of protection for personal data, we make efforts to ensure that there are in place appropriate safeguards.

#### **F. Lawful Basis for the Processing of Your Personal Data:**

We may process your personal data for one or more lawful bases of processing (“Lawful Basis”) depending on the specific purpose for which we are using your data. The Lawful Basis are the following:

- ❖ to perform our contractual obligations towards you;
- ❖ to be compliant with applicable legal and regulatory requirements;
- ❖ to pursue our legitimate interests.

Where our use of your personal information does not fall under one of the abovementioned Lawful Bases, we will require you to provide your consent. Such consent shall be freely given by you and you will have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists

#### **G. Retention of personal data:**

The retention of your personal data with the Company lasts for as long as data is required to serve the purpose for which the information was collected. In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our Clients. When we no longer need personal data, we securely delete or destroy it. The obligation to delete personal data can thus be triggered by various events (kindly refer to the section below).

#### **H. Your Rights:**

At any time, you have the right to request **Robertson** to access, request a copy, delete, change, correct inaccurate or incomplete data, or update your personal data. Moreover, you may ask us to cease the usage of your personal data or even request us to stop processing your data to third parties. The Company will process your request immediately and subject to any legal obligation.

Further to the above, you have the right to request from us where certain conditions apply, to restrict the processing of your personal data, and to have the data we hold about you transferred to another organisation. Where these conditions apply the Company will restrict the processing of your personal data and transfer your personal data to another organisation respectively.

Besides the above, you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing, or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Where you have provided your consent to process your personal data you have the right to withdraw your consent. Withdrawing your consent does not impact the lawfulness of the prior personal data processing.

To exercise any of the aforementioned rights, you can send your request to [info@robertsonfinanceinc.com](mailto:info@robertsonfinanceinc.com).

The Company may rectify, replenish, or remove incomplete or inaccurate information, at any time and at its own discretion.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

#### **I. Cookies and other trackers:**

We use various types of cookies and other types of web trackers, which enable us to administer and operate the Website. Our cookies and trackers are used mainly to collect statistical information about your use of the Website. We use cookies for Website analytics purposes, as explained above. You always have the option to opt out whether you already accepted cookies or not. In this respect, you can block, delete, or adjust the cookies settings on your browser.

Please refer to our [Cookies Policy](#) for more information.

#### **J. Update of the Policy:**

From time to time, the Company may change the terms of this policy. You agree to be bound by all changes made in the terms of this policy. Continuing to use the Website will indicate



your acceptance of the amended terms. If you do not agree with any of the amended terms, you must avoid any further use of the Website. In case of material amendments we will notify you accordingly.

**K. Contact Us or Complaint:**

You may contact us for more information or to submit your enquiry regarding this Policy at [info@robertsonfinanceinc.com](mailto:info@robertsonfinanceinc.com) or by completing our online contact form available [here](#).

If you wish to complain about how we have handled your personal data, please contact us directly at the abovementioned email address. If you are not satisfied with our response or believe we are collecting or processing your personal data in accordance with the laws, you can complain to the component data protection authority.

**Last Updated: January 2024**