



WHO WE ARE

Gravitas Finance LLC (Gravitas) is authorised and regulated in Mauritius by the Financial Services Commission, under the laws of Mauritius, with the business address of Unit 12, Socota Phoenicia, Sayed Hossen Road, Solferino, Phoenix, Mauritius. Veri-Platform, Veri-Group and Veri-Global are brands and branded products provided by and through Gravitas Finance LLC. Collectively, through this document and other relevant documents, Veri-Group refers to Gravitas Finance LLC.

Veri-Group will be what is known as the "Controller" of the personal data you provide to us. Veri-Groups administrative centre and correspondence address is Socota Ltd, Sayed Hossen Road, Solferino, Phoenix, Mauritius +230 483 3051 email: enquiries@veri-global.com.

Veri-Group are committed to protecting and respecting your privacy and will comply with all data protection laws in the country you are resident and use the Mauritian General Data Protection Regulations (GDPR), as the standard.

Additional to the provision of Veri-Group is Gravitas Finance LLC Limited, who are the regulated entity and are also a "Controller" of the personal data you provide to us.

WHAT WE NEED

Unless otherwise agreed with you, such as within the Terms and Conditions for application to Veri-Group, we will normally only collect basic personal data about you, which does not include any special categories of personal information about you (often known as "sensitive personal data"). This information does, however, include your name, gender, addresses, email address, phone number(s), date of birth, marital status, your spouse/civil partner's name and date of birth and, how you may be considering investing. We may also hold Anti-Money Laundering documentation for you such as a copy of your passport or other ID documentation, and proof of address documentation, and evidence of source of funds, evidence of source of funds, such as bank statements or salary statements where contributions are being made from. Veri Group places a premium on client portfolio security by adhering to stringent international protocols and standards. We provide robust protection and security for your client's investments and financial management services. Today and forever, you will navigate the world of finance with unparalleled safety and peace of mind with our assistance.

WHY WE NEED IT

During initial prospecting of an investment account at Veri-Group, we may be provided with this information to provide you and your financial adviser with application documentation and illustrations, to assist you in considering an application to the Veri-Group and to assist in the application process should you decide to proceed.

Furthermore, should you proceed with the application for a platform account, we will require the information to be able to provide you with the product you are applying for and to be able to meet our own legal obligations with respect to the provision of the product.

We need to have basic personal data in order to carry out lawful obligations arising from contracts entered into between you and Veri-Group and to provide you with the information and services that you have requested from us. We will never collect any personal data from you that we do not need in order to provide and oversee the services we have agreed to provide you with.

HOW WE OBTAIN IT

As Veri-Group only deal with regulated adviser firms, the personal data we receive for you will either be provided to us by your appointed adviser firm, or by you directly. We may occasionally ask you directly to provide us with personal data. The information may be provided to us by post, email, telephone, fax or where available, through our secure online portal.

WHAT WE DO WITH IT

All the personal data we hold about you will be processed by our staff in Mauritius and no third parties will have access to your personal data unless there is a legal requirement or it is required to fulfil the processing, maintenance and completion of the contract between you and the Veri-Group, such as your financial adviser, address & identity verification agencies, the bank holding your funds, current providers as part of the transferring process where necessary or the investment providers holding your investments, or other companies within the Veri group protected under this privacy policy to only be used for the purposes you request.

Some of these third parties may require your personal data to be transferred to, processed and stored at, a destination outside of Mauritius. By submitting your personal data, you agree to this transfer, processing and storing. Please also be aware that your information may be stored on a cloud-based system whose servers are located within the European Union.

As a rule, Veri-Group does not send marketing material to our Account Holders or share your information with any other organisation for marketing purposes. If this changes in the future we will ask for your express consent before anything is sent to you or provided to third parties about you.

HOW LONG WE KEEP IT

If you have entered into a contract with the Veri-Group for you to become an Account Holder of the Veri-Group, we will keep your personal data for a minimum of 6 years after you cease to be an Account Holder, to ensure we meet our legal and regulatory obligations. If we have received your personal data as a prospective Account Holder but you have not entered into a contract with the Veri-Group to become an Account Holder of the Veri-Group, we will destroy all personal data held for you 3 months from the date we first obtained it. Should you still wish to become an Account Holder of the Veri-Group thereafter, your personal data will need to be resubmitted.

YOUR RIGHTS

Under data protection legislation, you have several rights regarding the use of your personal data, as follows:

- You have the right if, at any point, you wish to either confirm whether your personal data is being processed and/or access the data we hold on you. You can request to see this information, usually free of charge, and we will respond to you within one month.
- You have the right for certain data you have provided Veri-Group with to be provided to you in a structured and commonly used electronic format (i.e. a Microsoft Excel file), so that you can move, copy or transfer this data easily to another data controller. You may also request that we transmit this data directly to another organisation, where it is practical for us to do so.
- You have the right to have data corrected if it is inaccurate or incomplete
- You have the right to have data deleted if it is no longer needed or there is no longer a legitimate reason for its retention, or if the data in question has otherwise unlawfully been processed. You may also request deletion of your personal data if it was only being processed as a result of you consenting to this and you now withdraw your consent.
- You have the right to object to the processing of your personal data (please note that this only provides you with the right to raise your objections, not a blanket right to have any and all processing cease).
- You have the right to restrict the processing of your personal data under certain circumstances, including if you have contested its accuracy and while this is being verified by Veri-Group, or if you have objected to its processing and while Veri-Group is considering whether it has legitimate grounds to continue to do so.

HOW TO COMPLAIN

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact our Data Protection Officer, Michael Thodda, at compliance@veri-global.com or write to us at the Mauritius address given below and we will investigate your concerns.