



**HILI  
PROPERTIES**

Hili Properties plc  
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## Hili Properties IPO Privacy Policy

We, the team at Hili Properties, strongly value our own privacy – and therefore are committed to protecting your personal data (i.e. information that identifies you) as though it is our own.

If you have any questions about how we protect your privacy, get in touch here: [dataprivacy@hiliproperties.com](mailto:dataprivacy@hiliproperties.com)

One of your rights under EU law – the GDPR – is that you must be informed when your personal data is processed (collected, used, stored) by any organisation. You also have the right to know the details and purpose of that processing.

This privacy policy describes our practices relating to the personal data of subscribers ('data subjects') to new ordinary shares of Hili Properties plc, as part of the Initial Public Offering ('IPO'). The data controller – the company that's responsible for your privacy – is Hili Properties plc with its address at Hili Properties, Nineteen Twenty Three, Valletta Road, Marsa, MRS 3000.

We assure you that we will only use and disclose any personal data collected from you in accordance with the manner set out in this policy.

### How we obtain your information

Your information is provided to us by the registrar (Bank of Valletta plc), which collects application forms from authorized financial intermediaries on our behalf. Your authorized financial intermediary acts as a separate data controller. For further information about the processing of your personal data by your authorized financial intermediary, please contact them directly.

### Information we collect

Most of the personal information which we collect about you is collected through the application form.

The information we collect from you normally includes the following:

- Your personal details
  - Identity card or passport number and country of issue
  - Your MSE account number and bank details (unless you are a joint applicant/decision maker/minor's parent/legal guardian/usufructuary)
  - Your date of birth and nationality
  - Your mobile number (this is only if you choose to register for an e-portfolio)

Please refer to the next sections to understand how and why we use this information.

### How and why we use your information

We use your information in order to be able to assign shares, pay dividends and manage your relationship with us. The legal bases for processing your personal data are the following:

- To perform our contract with you as well as to provide you with any support services which you may require
- Processing is necessary for compliance with legal obligations to which Hili Properties plc is subject.

## Retention periods

- We will hold on to your information for no longer than is necessary keeping in mind the purpose/s (or compatible purposes) for which we first collected the data.
- We may also keep hold of some of your information if it becomes necessary or required to meet legal or regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce our terms and conditions.
- As a guide:
  - we may keep certain categories of personal data for longer in order to meet any legal or regulatory requirements, or to resolve a legal dispute; and
  - we may keep different types of personal data for different lengths of time if required by law (for instance, we may need to keep certain personal data relating to purchases for about 10 years in order to comply with tax/VAT reporting requirements);
- You may obtain more information as to the retention periods or the criteria used by us to determine the retention periods by contacting us here [dataprivacy@hiliproperties.com](mailto:dataprivacy@hiliproperties.com)

## Children Under 18

If you are aged 18 or under, we will get your parent/guardian's permission before you provide any personal information to us.

In such cases, we process personal data relating to parents or guardians – and we may also need to request for verification documentation to ensure that consent is given or authorised by the holder of parental responsibility.

## Sharing your information

We do not, and will not, sell any of your personal data to any third party – including your name, address, or payment information. It is not our business to do so – and we want to earn your trust and confidence.

- However, we share your data with the following categories of companies as an essential part of being able to provide our services to you, as set out in this statement:
  - Companies in the group to which Hili Properties belongs, as sometimes different parts of our group are responsible for different activities (especially licensed ones); This includes Hili Properties – related entities and members of the Hili Ventures group (our mother group). Related entities and subsidiaries also provide us with services such as legal and corporate services, IT services and even assist us when publishing communications. Members of the group vary from time to time.
  - Professional service providers, such as Bank of Valletta plc as our registrar.
  - Credit reference agencies, law enforcement and fraud prevention agencies, so we can help tackle fraud.
- In most circumstances we will not disclose personal data without consent. However there may be occasions where we might have to – e.g. with a court order, to comply with legal requirements and satisfy a legal request, for the proper administration of justice, to protect your vital interests, to fulfil your requests, or in the event of a corporate sale, merger, reorganisation, dissolution or similar event involving us and/or our subsidiaries and related entities.

- When we do share data, we do so on an understanding with the other entities that the data is to be used only for the purposes for which we originally intended – again, we don't want you to have any surprises.
- We may also provide third parties with aggregated but anonymised information and analytics about our customers and, before we do so, we will make sure that it does not identify you. Anonymous information means it is anonymous.
- If we ever have to share data with entities that are outside of the EEA, we will be sure to do so in a manner that complies with the requirements established by the GDPR.

## Your rights

You enjoy several rights relating to your personal information:

1. The right to be informed about how your personal information is being used; We need to be clear with you about how we process your personal data. We do this through this Privacy Policy, which we will keep as up to date as possible.
2. The right to access the personal information we hold about you; You can access the personal data we hold on you by contacting us on [dataprivacy@hiliproperties.com](mailto:dataprivacy@hiliproperties.com)  
To process your request, we may need to verify your identity so that we can be sure we are releasing your personal data to the right person. We will carry out our best efforts to process your request within one month or, if the request is particularly complex, two months. We can provide you with a copy of your personal data in electronic format.  
If we consider the frequency of your requests as being unreasonable, we may refuse to comply with your request. In those circumstances, if you disagree, you can complain to the data protection authority – in Malta, the Information and Data Protection Commissioner.
3. The right to request the correction of inaccurate personal information we hold about you. If you think that the information we hold about you is inaccurate or incomplete please contact the Malta Stock Exchange directly and they will be able to update your details accordingly .
4. The right to request that we delete your data, or stop processing it or collecting it. You can ask us to delete your personal data; however, this is not an absolute right. In spite of a request for erasure, we may be justified to keep personal data which we need to keep, e.g. (i) to comply with a legal obligation (for instance, for VAT reporting purposes); (ii) if you still have a contract with us; and (iii) in relation to the exercise or defence of any legal claims. When you ask us to delete your personal data, we assume that you do not want to hear from us again. Other than as described above, we will always comply with your request and do so promptly. We would carry out our best efforts to notify any third parties with whom we have shared your personal data about your request so that they could also comply.
5. The right to request that we transfer elements of your data either to you or another service provider; You have the right to move, copy or transfer your personal data from one organisation to another. If you do wish to transfer your personal data we would be happy to help.  
If you ask for a data transfer, we will give you a copy of your personal data in a structured, commonly used and machine-readable form (e.g. a CSV file format). We can provide the personal data to you directly or, if you request, to another organisation. Please note that we are not required to adopt processing systems that are compatible with another organisation, so it may be that the recipient organisation cannot automatically use the personal data we provide.  
When making a transfer request, it would be helpful if you can identify exactly what personal data you wish us to transfer.
6. The right to complain to your data protection regulator — in Malta – the Information and Data Protection Commissioner (IDPC).
7. If you want to exercise your rights, have a complaint, or just have questions, please contact us [dataprivacy@hiliproperties.com](mailto:dataprivacy@hiliproperties.com).

Please appreciate that the rights must be exercised within some limitation – for example, if you ask us for information we can only give you what relates to you and not what relates to other persons. When we receive requests, we may also request that you identify yourself and provide documentation or information for verification (we would not want to disclose information to the wrong person). Unreasonable requests may be subjected to a reasonable fee or refusal to respond.

## Security of your personal data

Security of your personal data is very important to us. We do our best to keep the information you disclose to us secure. However, we can't guarantee or warrant the security of any information which you send to us. Security measures which have implemented to secure information transmitted stored on our systems include the following:

- Use of secure servers;
- Use of firewalls;
- Use of encryption;
- Physical access controls at data centres;
- Information access controls;
- Use of back-up systems;
- Information security policies;
- Multi factor authentication;
- Anti-malware systems;
- Regular training to our staff;
- Periodic vulnerability scans;
- Email security; and
- Patch management.

We also ensure that any third parties with whom we share information have appropriate levels of security to protect your personal data. Please understand, however, that no system is perfect or can guarantee that unauthorised access or theft will not occur.

## Changes to how we protect your privacy

Our website is continually under review – new functions and features are periodically added and improved to interface, thus changes to our privacy policy may be required from time to time.

We therefore encourage you to check our privacy policy on a frequent basis.

## Links to other websites

This privacy notice does not cover the links within this site linking to other websites which are not controlled by us. We are not responsible for the collection or use of your personal information from these third-party websites.

Therefore, we encourage you to read the privacy statements on the other websites you visit.

## How to contact us

We are always happy to hear from you, whether to make a suggestion but especially if you feel we can do better.

If you have any questions about this Privacy Policy, or if you wish to make a complaint about how we have handled your personal information, please contact us at [dataprivacy@hiliproperties.com](mailto:dataprivacy@hiliproperties.com)