



EU DATA PROTECTION NOTICE

The Data Protection Act (Cap 586) and the General Data Protection Regulation (“**GDPR**”) (together the “**Data Protection Laws**”) impose certain obligations on M.T. Mediterranean Towers Limited (the “**Company**”) as a data controller with respect to its use of Personal Data and cover Personal Data held electronically and as part of a manual filing system. “Personal Data” is information about living individuals (Data Subjects), being information that relates to them or which identifies them directly or indirectly.

Types of Data Subjects

1. Private persons who are suppliers or landlords or who are directors, officers, employees, partners or shareholders of a landlord company or legal entity.
2. Private persons who are directors, officers, employees or contractors of a licensee who is a legal entity.

The Company Considers the Following Personal Data Relevant and Process it on the Following Legal Bases:

Type of Data	Legal Basis (depending on the purposes – listed below)
1. Personal details including name, address, status within a relevant legal entity with whom we have a contractual relationship	Necessary for the performance of a contract to which the individual is a party (or to take pre-contractual steps) under Art. 6(1)(b) GDPR; or Necessary for compliance with a legal obligation to which the Company is subject under Art. 6(1)(c) GDPR; or Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR. Such legitimate interests are mentioned below.
2. Bank/building society details	Necessary for the performance of a contract to which the individual is a party under Art. 6(1)(b) GDPR; or Necessary for the purposes of the legitimate interests pursued by the Company or a third party under Art. 6(1)(f) GDPR. Such legitimate interests are mentioned below.
3. Government and other official information (PPS numbers for stamp duty purposes)	Necessary for compliance with a legal obligation to which the Company is subject under Art. 6(1)(c) GDPR.
4. Supplemental information from other sources	We and our service providers may supplement the Personal Data we collect with information obtained from other sources (for example, publicly available information from third party commercial information sources, and information from our business partners).

The processing of the Personal Data elements mentioned above is necessary for us to enter into a contract with you or the legal entity to which you belong and is therefore mandatory to enter into such contract.

In case you don't provide the Personal Data, we will not be able to perform the contractual relationship with you or the legal entity to which you belong. If you are a director, officer, employee, partners or shareholders of the legal entity contracting with us, please note that we obtained your personal Data through the legal entity to which you belong.

M.T. Mediterranean Towers Limited – C97967
171, Old Bakery Street,
Valletta VLT 1455,
Malta



Purposes for which Data is Held

Personal Data is collected primarily for the purposes of (all of which constitute our legitimate interests):

1. managing our assets and property leases and performing our obligations and exercising our rights under such agreements;
2. communicate with you and other individuals;
3. manage our business operations and IT infrastructure, in line with our internal policies and procedures, including those relating to finance and accounting; billing and collections; IT systems operation; data and website hosting; data analytics; business continuity; records management; document management; and auditing; In addition, we monitor electronic communications between us (for example, emails) to protect you, our business and IT infrastructure, and third parties including by:
 - a. identifying and dealing with inappropriate communications; and
 - b. looking for and removing any viruses, or other malware, and resolving any other information security issues.
4. maintaining records relating to business activities, budgeting, financial management and reporting, communications, managing mergers, acquisitions, sales, reorganisations or disposals of assets and integration with purchaser.
5. manage complaints, feedback and queries, and handle requests for data access or correction, or the exercise of other rights relating to Personal Data;
6. establish and defend legal rights to protect our business operations, and those of our business partners, and secure our rights, privacy, safety or property, and that of our business partners, you, or other individuals or third parties and to enforce our contractual or legal rights; and
7. complying with legal and regulatory obligations, record-keeping and reporting obligations, insurance requirements, payment of tax and duty, compliance with requests from government or other public authorities (including those outside your country of residence if required), responding to legal process such as subpoenas, summons or warrants, court orders, conducting investigations and complying with internal policies and procedures.

Disclosure of Personal Data

We may disclose Personal Data to our service providers, such as accountants, auditors, experts, lawyers and other professional advisors; IT system providers, marketing agents, support and hosting service providers; advertising, marketing and market research providers; banks and financial institutions that service our accounts; document and records management providers; and other third party vendors and outsourced service providers and group companies that assist us in carrying out business activities.

For your complete information, our service providers are subject to a strict obligation of confidentiality and in any event, will not be authorized to process your personal data for purposes other than those mentioned in the present notice.

We may also share Personal Data with: (a) government or other public authorities (including, but not limited to, courts, regulatory bodies, law enforcement agencies, tax authorities and criminal investigations agencies); and (b) third party participants in legal proceedings and their accountants, auditors, lawyers, and other advisors and representatives, as we believe to be necessary or appropriate.

Data Transfers outside the EEA

The Company transfers Personal Data outside the EEA to its parent company, Phoenix Tower International LLC and its service providers in the United States. As there is no adequacy decision of the European Commission for the United States, appropriate safeguards in accordance with the Data Protection Laws are implemented for transferring your Personal Data in the United States. Indeed, M.T. Mediterranean Towers Limited and Phoenix Tower International LLC have entered into EU Standard Contractual Clauses. In order to obtain a copy of such Standard Contractual Clauses please send an email to security@phoenixintl.com.

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Retention Periods

The Company will keep Personal Data for as long as is necessary for the purposes for which we collect it. Where the Company holds Personal Data to comply with a legal or regulatory obligation, we will keep the information for at least as long as is required to comply with that obligation.

Where we hold Personal Data in the context of a contractual relationship, we will keep the information for at least as long as that contractual relationship, and for a number of years thereafter. The number of years varies depending on the nature of the contractual relationship (which could be up to 7 or 13 years post termination of the relationship) and will be retained for a longer period in the event of legal or prospective legal proceedings. Any Personal Data contained on documents which are required to be retained for title purposes in respect of property rights will be retained for so long as such retention is required in order to evidence title or other property interest.

Where the Company holds Personal Data to comply with a legal or regulatory obligation, information will be kept for as long as is required to comply with that obligation.

Data Subject Rights

Data Protection Laws provide the following rights in favour of Data Subjects pursuant to Data Protection Laws:

- a) the right to receive information on the processing (which is provided here or any other forms or notices provided to you);
- b) the right of access to Personal Data (*i.e.* the right to access the personal data itself and other information such as the purposes of the processing or the retention period);
- c) the right to rectify inaccurate Personal Data or erase Personal Data (right to be forgotten);
- d) the right to restrict processing;
- e) the right to data portability (*i.e.* the right to receive your personal data in a standardized format and transmit them to another data controller);
- f) the right to object to the processing of Personal Data; and
- g) the right to complain to the relevant data protection commission – the Office of the Information and Data Protection Commissioner - in the event you have a complaint or believe your rights have been infringed (in such cases we would request that you bring the matter to our attention in the first instance so that we may discuss it with you).

Requests to exercise the rights b) to g) will be processed as soon as practicable. Please note that some of the above-mentioned rights, such as the right of data erasure, portability and objection, are restricted by Data Protection Laws and must be fulfilled by us possibly only under certain conditions.

In order to ensure the Company's files are accurate and up to date, please notify the Company as soon as possible following any change in relevant Personal Data.

Who to Contact about your Personal Data

To exercise the rights mentioned above, or for any question, please contact security@phoenixintl.com

This Privacy Notice was last updated in August 2021.