



MARCELLUS CAPITAL CAMBODIA WEBSITE PRIVACY POLICY

Effective Date : 1 September 2024

The website www.marcelluscapitalcambodia.com ("Site") is owned and operated by Marcellus Capital Cambodia Private Limited Company who is the data controller and may be contacted at :

Marcellus Capital Cambodia
Email : adil@marcelluscapitalgroup.com

PURPOSE

The purpose of this privacy policy ("Privacy Policy") is to inform users of our Site of the following :

1. The personal data we will collect.
2. Use of collected data.
3. Who has access to the data collected.
4. The rights of Site users.
5. The Site's cookie policy.

GDPR

For users in the European Union, we adhere to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, known as the General Data Protection Regulation ("GDPR"). For users in the United Kingdom, we adhere to the GDPR as enshrined in the Data Protection Act 2018.

We have not appointed a Data Protection Officer as we do not fall within the categories of controllers and processors required to appoint a Data Protection Officer under Article 37 of the GDPR.

CONSENT

By using our Site users agree that they consent to the conditions set out in this Privacy Policy.

LEGAL BASIS FOR PROCESSING

We collect and process personal data about users in the EU and the UK only when we have a legal basis for doing so under Article 6 of the GDPR. In instances where users outside the EU or UK visit our Site, we apply the data processing regulations applicable to the UK.

We rely on the following legal basis to collect and process the personal data of users in the EU :

1. Processing of user personal data is necessary for us or a third party to pursue legitimate interest. Our legitimate interest is not overridden by the interests of fundamental rights and freedoms of users. Our legitimate interests are due diligence, compliance and communication.
2. Processing of user personal data is necessary for us to take, at the request of a user, steps before entering a contract or for the performance of a contract to which a user is a party. If a user does not provide the personal data necessary to perform a contract, then no contract is entered into.

PERSONAL DATA WE COLLECT

We only collect data that helps us to achieve the purpose set out in this Privacy Policy. We will not collect any additional data beyond the data listed below without notifying you first.



DATA COLLECTED IN A NON-AUTOMATIC WAY

We may also collect the following data when you perform certain functions on our Site :

1. First and last name.
2. Email address.
3. Telephone number.

This data may be collected using the contact form a user completes on our website.

HOW WE USE PERSONAL DATA

Data collected on our Site will only be used for the purposes specified in this Privacy Policy or indicated on the relevant pages of our Site. We will not use your data beyond what we disclose in this Privacy Policy.

The data we collect when the user performs certain functions may be used for the purpose of communication.

WHO WE SHARE PERSONAL DATA WITH

User personal data is used by our employees for the purpose of communication with the user.

OTHER DISCLOSURES

We will not sell or share your data with third parties, except in the following cases :

1. If the law requires it.
2. If it is required for any legal proceeding.
3. To prove or protect our legal rights.

If you follow links from our Site to another site, please note that we are not responsible for and have no control over their privacy policies and practices.

HOW LONG WE STORE PERSONAL DATA

User data will be stored until the purpose the data was collected for has been achieved. You will be notified if your data is kept for longer than this period.

HOW WE PROTECT YOUR PERSONAL DATA

All data is only accessible to our employees. Our employees are bound by strict confidentiality agreements and a breach of this agreement would result in the employee's termination.

While we take all reasonable precautions to ensure that user data is secure and that users are protected, there always remains the risk of harm. The internet as a whole can be insecure at times and, therefore, we are unable to guarantee the security of user data beyond what is reasonably practical.

YOUR RIGHTS AS A USER

Under GDPR you have the following rights :

1. Right to be informed.
2. Right to access.
3. Right to rectification.
4. Right to erasure.
5. Right to restrict processing.
6. Right to data portability.
7. Right to object.



CHILDREN

We do not knowingly collect or use personal data from children under 16 years of age. If we learn that we have collected personal data from a child under 16 years of age, the personal data will be deleted as soon as possible. If a child under 16 years of age has provided us with personal data, their parent or guardian may contact us.

HOW TO ACCESS, MODIFY, DELETE OR CHALLENGE THE DATA COLLECTED

If you would like to know if we have collected your personal data, how we have used your personal data, if we have disclosed your personal data and to who we disclosed your personal data, if you would like your data to be deleted or modified any way, or if you would like to exercise any of your other rights under the GDPR, please contact us here :

Marcellus Capital Cambodia
Email : adil@marcelluscaptialgroup.com

COOKIE POLICY

A cookie is a small file, stored on a user's hard drive by a website. Its purpose is to collect data relating to the user's browsing habits. You can choose to be notified each time a cookie is transmitted. You can also choose to disable cookies in your internet browser, but this may decrease the quality of your user experience.

We use the following types of cookies on our Site :

Third-party cookies created by a website other than ours to monitor user preferences to tailor advertisements around their interests.

MODIFICATIONS

This Privacy Policy may be amended from time to time in order to maintain compliance with the law and to reflect any changes to our data collection process. When we amend this Privacy Policy we will update the Effective Date at the top of this Privacy Policy. We recommend that our users periodically review our Privacy Policy to ensure that they are notified of any updates. If necessary, we may notify users by email of changes to this Privacy Policy.

COMPLAINTS

If you have any complaints about how we process your personal data, please contact us through the contact methods listed herein so that we can, where possible, resolve any issues. If you feel we have not addressed your concern in a satisfactory manner, you may contact a supervisory authority. You also have the right to directly make a complaint to a supervisory authority. You can lodge a complaint with a supervisory authority by contacting the Information Commissioner's Office in the UK Data Protection.

The Marcellus Capital Group approaches confidentiality and non-disclosure in an extremely serious manner at all times.

