

Bond Holder Privacy Policy

Tumas Investment PLC, consider it important to protect your privacy rights. This Privacy Policy, explains our information practices and the way in which your information is collected and used. By providing us with your personal information, you signify your consent to us processing such personal data in accordance with this Privacy Policy, as specified below.

Information about our Organisation;

Tumas Investments PLC is a public limited liability company registered in Malta in terms of the Companies Act Registration Number C 27296. The Company was incorporated in 2000 to act as a finance company for Tumas Group to finance the Portomaso project and other major projects. Such funding enables the Group to exploit its potential and seize new opportunities arising in the market.

Organisation Name: Tumas Investment plc

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| Address: | Tumas Group Corporate Office, Level 3, Portomaso Business Tower, Portomaso St. Julians, STJ 4011 |
| Country: | Malta |
| Controller: | Tumas Investment plc |
| Web Sites: | http://www.tumas.com/investments.aspx |

Our principal activities are:

Property developers, Management Services, Hospitality & Leisure.

The services and links of our Web site

Our Website does not enable our visitors to communicate with other visitors or to post information to be accessed by others. Please note that upon linking to such other Web sites, our company are no longer control any data.

Purposes for which we may process your data

We may use the contact details in order to provide you with information about Tumas Group products and services by ordinary mail, e-mail, telephone, SMS or any other means you will provide us with. We may further disclose any such contact details to Tumas Group or any other company that may be a parent, subsidiary or associated company of Tumas Group Ltd in order that such company may itself direct market its own products and services to you.

Retention and Purpose limitation of personal data

No personal data that we process will be kept longer than necessary for the purposes for which they are processed.

Disclosure and Visitor Choice

Other than as stated in this Privacy Policy, we do not disclose your personal data to any third party outside Tumas Group, without your prior consent or unless we are otherwise obliged or authorised to do so by or under any law.

Security

We use reasonable efforts to safeguard the confidentiality of all personal data that we process relating to you and regularly review and enhance our technical, physical and managerial procedures so as to ensure that your personal data is protected from;

- *unauthorised access*
- *improper use or disclosure*
- *unauthorised modification*
- *unlawful destruction or accidental loss*

To this end we have implemented security policies, rules and technical measures to protect the personal data that we have under our control. All our employees and data processors, who have access to, and are associated with the processing of personal data, are further obliged to respect the confidentiality of bondholders' personal data.

By its very nature however the Internet is not a secure medium. We cannot guarantee the privacy or confidentiality of any information passing over the Site. We exonerate ourselves from any liability whatsoever in relation to any errors or omissions that may reveal themselves in your personal information and in relation to any damage that may result from such errors or omissions. We further exonerate ourselves from liability for any damage that may arise from the unauthorised acts of third parties and/or the corruption of data being sent by you to our offices.

Access to the personal data that we may process about you

You have a right to request access to and/or correction of the personal data that we process in relation to you. Any such request must be made in writing to Tumas Group Ltd, Corporate Office, Level 3, Portomaso Business Tower, Portomaso, STJ 4011, Malta.

Privacy Compliance

Our Privacy Policy is compliant with the GDPR and the Data Protection Act 2001, Malta

Privacy Support

If you have an enquiry or concern about our Privacy Policy, please contact us on email address: info@tumas.com

We welcome any comments or suggestions that you may have, which may contribute to our offering you a better quality of service.

You also have the right to lodge a complaint with the office of the Information and Data Protection Commissioner, as the data protection supervisory in Malta, should you deem it necessary to do so.

Changes to the Privacy Policy

We reserve the right to modify this Privacy Policy at any time should statutory obligations so mandate, or should the interest of our users' security so require. Any such changes will be posted here so that you are always kept informed of how and why we process your personal information.