

PRIVACY POLICY – Competitions Version 1.0

Diligex Limited, a company registered under the Laws of Malta, bearing company registration number C 73892 (“we”, “us” or “Diligex”) is organising a competition in which participants have the chance to win a prize (hereinafter “the Competition”).

The organisation of and your participation in the Competition will require us to process personal data. Since your privacy and the protection of personal data is fundamentally important to us, the following constitutes the privacy policy of Diligex, prepared in accordance with the provisions of Article 13 and 14 of the GDPR, and essentially clarifies our data handling practices.

This Privacy Policy is intended to solely govern and regulate the processing of personal data relating to the organisation and delivery of the Competition. They should be viewed as supplementary to, rather than as replacing the Privacy Policy which govern our general data processing practices. In the case of discrepancy between this specified Privacy Policy and the general Privacy Policy, this specified Privacy Policy take precedence and prevail.

1. Who are we; what does this policy cover; who is the data controller?

Diligex is a company involved and engaged in the field of AML compliance and provides a number of related services and solutions.

Unless otherwise stated, Diligex shall be deemed to be a data controller for the processing of personal data related to the Competition. Accordingly, the document applies to the processing of such personal data carried out by Diligex in its capacity as data controller.

This policy is intended to provide a high-level overview of the personal data that is collected by us whilst we organise and administer the Competition, and thus deals with:

- (a) how this personal data is collected;
- (b) why do we need to collect such personal data; and
- (c) how we comply with the provisions of laws relating to the protection of personal data as applicable to us, in particular Regulation (EU) 2016/679 (“GDPR”).

Throughout this document, we will be using certain specific terms. Since our intention is that this document is easily understood, we would like to clarify what these terms are intended to refer to. Naturally, if anything is unclear, please do not hesitate to get in touch with us.

In terms of the provisions of the GDPR, the term “*personal data*” is defined as ‘*any information relating to an identified or identifiable natural person (‘data subject’)*’. Furthermore, the term “*processing*” is also given a wide meaning and is defined as ‘*any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means.*’ This includes collection, recording, storage, adaptation, and use of personal data.

2. Do we process personal data? If so, what data and how?

When you register for and/or participate in one of our Competitions, we will process the following personal data about you:

- a. Identification Data: Name, surname
- b. Contact Data: Email address, phone number, residential address
- c. Company Data: Company name, industry, position/role
- d. Employment Status: Job title, employer, sector of work
- e. Competition Data: Answers to competition questions, entries, submissions
- f. Marketing Preferences: Opt-in status, preferences for receiving promotions

In addition to the above, please note that we will also collect certain data about your device or browser automatically via log files, such as your Media Access Control (MAC) address, device ID, operating system name and version, browser type, and device manufacturer and model.

We may also collect your IP address. We use data about your device to ensure our solutions functions properly, diagnose server problems, and administer our software solutions and the services we provide.

How do we collect your personal data from?

We will obtain your personal data directly from you (such as when you submit an online form to register for one of our Competitions), or directly through your participation in the Competition (such as when you ask questions). Please refrain from providing details of third parties.

3. Why do we collect personal data and what is the legal basis for doing so?

We will primarily use and process your personal data to organise, facilitate the delivery of and provide you with access to the Competition, in compliance with any applicable terms.

Thus, we need to process personal data to administer and perform our services, including to carry out our obligations arising from our contractual relationship with you in relation to the particular Competition for which you have registered.

Our legal basis to process such personal data is performance of a contract, in accordance with the provisions of Article 6(1)(b) GDPR and our legitimate interest, in accordance with the provisions of Article 6(1)(f) GDPR (to organise, manage and run our Competitions).

We also seek your consent separately for two purposes (a) Promotional Use – To allow us to use your details for promotional purposes and promotion; and (b).Direct Marketing – To collect and use your details for direct marketing communications. Consent is requested separately for each purpose, giving you the flexibility to choose which you agree to. You may withdraw your consent at any time without any detriment.

Moreover, we will process other personal data when we have a proper reason for doing so, and particularly to manage the organisation of, and your participation to the Competitions, as further set out hereunder:

Purpose	Description	Legal Basis
Business Intelligence & Analytics	To collect and anonymise data for statistical and benchmarking purposes.	Legitimate interest (to improve user experience and our solutions).
Safeguard of our interests	to keep our software solutions and infrastructure secure, including through identity management and security monitoring to detect, prevent and respond to suspicious activity, fraud, intellectual property infringement, misuse, violations of our terms or law and for other similar purposes;	legitimate interest (to safeguard our interests).
Business take-over	To make certain information available to third parties that may be interested in acquiring our business (either prior to or as part of the transaction). This includes, amongst others, any merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock.	Legitimate interests (to ensure that we are able to sell our business, should we decide to do so).

Prior to relying on legitimate interest as a legal basis for data processing, we have conducted a balancing test in accordance with the provisions of the GDPR.

If you fail to provide personal information

Whilst we respect your choice not to share personal data, please note that if you decide not to provide personal data, you will not be able to participate in a Competition.

Please note that even if you choose not to provide personal data, we may still collect certain data, as outlined in our privacy policy.

4. Other

The other information required by Article 13 and 14 GDPR is outlined in the general Privacy Policy.

Version 1

Date: 3rd March 2026

Changes to the Privacy Policy - We may alter these terms at any time, but in any case we will inform you accordingly, by means we deem reasonable in the circumstances. In the event of any conflict between the current version of these terms and any previous version(s), the provisions current and in effect shall prevail unless it is expressly stated otherwise.