

# PRIVACY POLICY

## **Introduction**

This Privacy Policy outlines how Benjo Limited (“we,” “us,” or “Company”) collects, uses, and protects your information when you interact with our website (<https://101mt.com/>) and services.

### **1. Purpose of this Privacy Policy**

This Privacy Policy explains how we handle your personal data during and after your relationship with us or while using our website. It forms part of our Terms and Conditions and applies to all visitors and registered users. We may update this Policy, and you will be notified of any material changes. By continuing to use our website, you agree to this Privacy Policy. If you do not agree, please stop using our website immediately.

### **2. Personal Data Collected and their Use**

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We shall collect only the absolutely necessary personal data about you required for the provision of our contractual obligation towards you. Therefore, while using our website and/or our services, we may ask you to provide us with certain personal data which may include inter alia the following:

- your Name and Surname;
- your contact information such as your email address and phone number;
- your Country and residential address;
- your IP address (a unique identifier for your computer or other access devices and alike);
- your payment details, such as card number.

We also maintain personal data as a result of your website usage, that is information on the frequency which you access our website and how you use this website.

We shall process the personal data collected for the following purposes:

- To fulfil our contractual obligations and provide you with our services as per your request.
- To improve our website and the experience quality of the website’s user(s), inter alia statistics on the frequency of visitors visiting the website.
- To communicate with you upon your request.
- To inform you or send you material regarding our products and services upon your request.
- To send you text messages and/or email communication regarding, any e-learning and/or educational training courses with regards to our services, upon your request.

We will not collect, process or transfer your personal data, for any other purpose, without you providing your prior consent.

Pursuant to the applicable data protection laws, we have a legal duty to respect and protect any personal information we collect from you and we will abide by such duty. Save as otherwise provided in the Terms and Conditions of this website, or unless obliged to comply with any law, regulation or court order, we take all precautions necessary to prevent any unauthorised access and we will not pass

and/or transfer any of your details, as collected through this website and any details collected from you as a visitor or user of our services, to any third party.

All personal information communicated to us are kept within our own records in accordance with the applicable laws and regulations.

### 3. Maintaining your data

We retain personal information for as long as we reasonably require it for legal or business purposes. In determining data retention periods, we take into consideration local applicable laws and contractual obligations. When information is no longer needed, we proceed with destruction procedures.

### 4. Failure to Provide Personal Information

In some occasions withdrawing or not providing your consent will have an impact on us for continuing the provision of services.

You have a choice to supply any or all of the personal data required. However, failure or unwillingness on your part to provide data requested may have as a result failure of provision of services.

### 5. Control over your information

We note that, subject to certain limitations, you have the below rights with regards to your personal data:

**Access your personal data:** You may request from us to receive a copy of the personal data we hold about you and check that we are lawfully processing it. We hereby reserve our right to charge a relevant fee for providing such record of personal data to the person requesting this, except where this is not allowed under any relevant legislation.

**Correction of our records:** You may request us to correct any incomplete or inaccurate data we hold about you, though we may need to verify the accuracy of the new data you provide to us.

**Deletion:** You have the right to request that we erase or remove your personal data in certain circumstances. This applies where there is no good reason for us continuing to process it, or where you have successfully exercised your right to object to processing (as per below), or where you believe we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Objection to processing:** Where you do not agree with us using your data you have the right to object.

**Restriction of processing:** You can at any time restrict or suspend our processing of your personal data in certain circumstances: (a) if you want us to establish the data's accuracy; (b) where the processing of data is unlawful and you oppose to the erasure of the personal data and request the restriction of their use instead; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party:** Upon your request we can provide you with your personal data or provide these to a third party you have chosen. We hereby reserve our right to charge a relevant fee for providing such personal data, except where this is not allowed under any relevant legislation.

**Revoke consent:** Where we have obtained your consent to process your personal data, you may withdraw your permission at any time.

## 6. **Security**

Personal data is processed in a manner that ensures appropriate security and confidentiality, including preventing unauthorised access to or use of personal data. We shall protect all data from loss, misuse, unauthorised access or disclosure, alteration, or destruction. We shall not be liable for unlawful or unauthorised use of any personal information due to misuse or misplacement of the passwords, negligent or malicious use.

We maintain policies and procedures and have measures in place in order to ensure high levels of protection of personal data which include, inter alia, appropriate restrictions on permissions of access to personal information, controls and monitoring of storing of data.

All our employees and providers are required to follow certain privacy and security policies and procedures. With regards to links to web sites controlled or offered by third parties which may appear on this website, we hereby waive any responsibility for the security and privacy of any third party or any information collected by them. It is recommended that a visitor or a registered user always reviews the said providers' privacy policies.

## 7. **Third Parties and Third-Party Links**

Please note that in cases where we receive services from third parties, such third parties may require access to your personal data. In those circumstances those third parties shall be required to enter into an agreement with terms no less stringent than found in this Privacy Policy and to process your personal data solely in accordance with our instructions. You consent to your personal data being provided to such third parties for these purposes.

Third party companies that assist us in providing services, are required to maintain the confidentiality of such data to the extent they receive it and to use the personal data only in the course of providing such services and only for the purposes dictated by us. Our third-party providers are not permitted to share or use any of the personal data we distribute to them for any other purpose than their contractual obligation with us and with the sole purpose of providing you with our services.

Our services might also contain links to websites operated by third parties. We provide these links for your convenience, but we do not review, control or monitor the privacy or other practices of websites operated by third parties. We are not responsible for the performance of websites operated by third parties or for your business dealings with them.

## 8. **Cookies**

Our website uses cookies to enhance your experience. For more details on how we use cookies, please refer to our Cookies Policy.

## 9. **Policy Updates**

We may update this Privacy Policy periodically. We recommend checking our website regularly for any changes.

## 10. **Contact us**

For questions about this Privacy Policy or your personal data, please contact us at [info@mt101.com](mailto:info@mt101.com)