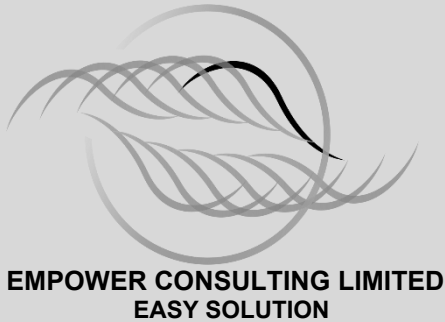




WEBSITE PRIVACY POLICY

Pursuant to the Gibraltar General Data Protection Regulation ("Gibraltar GDPR") and the Gibraltar Data Protection Act 2004

1. INTRODUCTION

The protection of personal data and the safeguarding of users' privacy are fundamental principles of Empower Consulting Limited.

This Website Privacy Policy describes how Empower Consulting Limited collects, uses, stores, protects and, where applicable, shares the personal data of users who visit and use the Company's website:

<https://www.empowerconsultingltd.com>

This Privacy Policy applies to personal data collected through the website, including data submitted via contact forms, email communications, requests for information, and any interactions with the Company's online services.

Personal data shall be processed lawfully, fairly and transparently, exclusively for specified, explicit and legitimate purposes, in accordance with the following principles:

- Lawfulness, fairness and transparency;
- Purpose limitation;
- Data minimization;
- Accuracy and data updating;
- Storage limitation;
- Integrity and confidentiality;
- Accountability of the Data Controller.

Empower Consulting Limited implements appropriate technical and organizational measures to protect personal data against unauthorized access, loss, destruction, disclosure, alteration or any unlawful processing.

This Privacy Policy should be read in conjunction with the Company's Cookie Policy and any additional privacy notices that may be provided whenever specific categories of personal data are collected.

2. DATA CONTROLLER

The Data Controller responsible for the processing of personal data collected through this website is:

EMPOWER CONSULTING LIMITED

Company Registration No.: 124524

Registered Office:

Eurocity, Unit G02

Europort Avenue

Gibraltar GX11 1AA

Gibraltar

Email: info@empowerconsultingltd.com

Website: <https://www.empowerconsultingltd.com>

Empower Consulting Limited determines the purposes and means of processing personal data in accordance with the Gibraltar General Data Protection Regulation (Gibraltar GDPR) and the Gibraltar Data Protection Act 2004.

Any individual wishing to obtain further information regarding the processing of personal data or to exercise the rights provided under the applicable data protection legislation may contact the Data Controller using the contact details provided above.

At present, Empower Consulting Limited is not required to appoint a Data Protection Officer (DPO) under the applicable legislation. Any requests relating to data protection matters will therefore be managed directly by the Data Controller.

3. CATEGORIES OF PERSONAL DATA COLLECTED

Empower Consulting Limited collects and processes only the personal data necessary to fulfil the purposes set out in this Privacy Policy.

Personal data may be collected directly from the data subject or automatically during the use of the Company's website.

The categories of personal data processed may include the following:

3.1 Personal Data Voluntarily Provided by the User

Users may voluntarily provide personal data by completing the website contact form, sending communications to the Company's official email address, or using any other communication channels made available by Empower Consulting Limited.

Such personal data may include, but is not limited to:

- Full name;

- Company or organization;
- Job title or professional position;
- Email address;
- Telephone number;
- Country of residence or origin;
- Any other information voluntarily included in enquiries, requests or communications submitted by the user.

The provision of such personal data is voluntary; however, it may be necessary to enable Empower Consulting Limited to respond to enquiries or provide the requested information or services.

3.2 AUTOMATICALLY COLLECTED DATA

When users browse the website, certain technical information may be collected automatically, including:

- IP address (where applicable);
- Browser type;
- Operating system;
- Preferred language;
- Date and time of access;
- Pages visited;
- Time spent on the website;
- Referring website;
- Technical information required to ensure the proper operation and security of the website.

Such information is collected exclusively for statistical analysis, website security, system maintenance and continuous improvement purposes.

3.3 COOKIES AND SIMILAR TECHNOLOGIES

The website uses cookies and similar technologies to ensure its proper operation, enhance the user browsing experience and collect statistical information regarding the use of the website.

Further details are available in the Company's Cookie Policy.

3.4 DATA RELATING TO JOB APPLICANTS AND SUPPLIERS (WHERE APPLICABLE)

Where users voluntarily submit their Curriculum Vitae (CV), employment applications or commercial proposals to Empower Consulting Limited, any personal data contained in such documentation will be processed solely for

the purpose of evaluating the application or commercial proposal, in accordance with the applicable data protection legislation.

4. PURPOSES OF PROCESSING PERSONAL DATA

Empower Consulting Limited processes personal data exclusively for lawful, specified and legitimate purposes directly related to its business activities and the services it provides.

Personal data may be processed for the following purposes:

4.1 MANAGING ENQUIRIES

To respond to requests for information, clarifications, quotations or any other communications submitted by users through the website, email or other available communication channels.

4.2 Service Delivery

To manage relationships with clients, suppliers, consultants and business partners, including the preparation of commercial proposals, contracts, consultancy services, operational coordination and technical support.

4.3 COMPLIANCE WITH LEGAL OBLIGATIONS

To comply with applicable legal and regulatory requirements, requests from competent authorities, and any other legal obligations to which Empower Consulting Limited is subject.

4.4 ADMINISTRATIVE AND ORGANISATIONAL MANAGEMENT

For administrative, accounting and organizational purposes, including the management of business relationships, operational planning and corporate documentation.

4.5 WEBSITE SECURITY

To ensure the security of the website, prevent unauthorized use, detect fraudulent or malicious activities, and protect the Company's IT infrastructure.

4.6 WEBSITE IMPROVEMENT

To analyze the performance of the website, enhance its functionality, optimize its content and improve the user browsing experience through aggregated and, where applicable, anonymized statistical data.

4.7 Recruitment (Where Applicable)

Where users voluntarily submit a Curriculum Vitae (CV) or a job application, the personal data provided will be processed solely for the purpose of assessing the application and, where appropriate, initiating the recruitment process.

Personal data will not be processed for purposes incompatible with those described above, nor will it be subject to solely automated decision-making or profiling activities, except where permitted by applicable legislation and following appropriate notice to the data subject.

5. LEGAL BASIS FOR PROCESSING

Empower Consulting Limited processes personal data only where one or more of the lawful bases for processing established under the **Gibraltar General Data Protection Regulation (Gibraltar GDPR)** apply.

In particular, the processing of personal data may be based on one or more of the following legal grounds:

5.1 PERFORMANCE OF A CONTRACT OR PRE-CONTRACTUAL MEASURES

Processing is necessary to respond to enquiries, prepare commercial proposals, negotiate contracts, provide consultancy services or carry out activities requested prior to entering into a contractual relationship.

5.2 COMPLIANCE WITH LEGAL OBLIGATIONS

Processing may be necessary to comply with applicable laws and regulations, requests from competent authorities or any other legal obligations to which Empower Consulting Limited is subject.

5.3 LEGITIMATE INTERESTS OF THE DATA CONTROLLER

Empower Consulting Limited may process certain personal data where such processing is necessary for the pursuit of its legitimate interests, provided that such interests do not override the rights and fundamental freedoms of the data subject.

These legitimate interests may include, but are not limited to:

- Ensuring the security of the website and IT systems;
 - Preventing unauthorized, fraudulent or improper use of the website;
 - Improving the quality of the services provided;
 - Managing and protecting business relationships with clients, suppliers and business partners;
 - Establishing, exercising or defending legal claims where necessary.
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5.4 CONSENT OF THE DATA SUBJECT

Where required by applicable legislation, personal data will be processed only with the freely given, specific, informed and unambiguous consent of the data subject.

The data subject has the right to withdraw such consent at any time without affecting the lawfulness of any processing carried out prior to its withdrawal.

5.5 PROVISION OF PERSONAL DATA

The provision of personal data is, in certain circumstances, necessary to enable Empower Consulting Limited to respond to enquiries or provide the requested services.

Failure to provide the requested personal data may prevent the Company from responding to the enquiry or delivering the requested services.

6. COOKIES

The Empower Consulting Limited website uses cookies and similar technologies to ensure the proper operation of the website, enhance its security, improve the user browsing experience and collect statistical information regarding website usage.

Cookies are small text files stored on the user's device during browsing, enabling the website to recognize the device during subsequent visits.

The website may use the following categories of cookies:

- **Strictly Necessary Cookies:** Which are essential for the proper operation of the website and do not require the user's consent.
- **Analytical Cookies:** Used to collect statistical information regarding website usage. Where such cookies are not anonymized or are provided by third parties, they will only be used with the user's prior consent, where required by applicable legislation.
- **Functional Cookies:** Intended to enhance the browsing experience and remember user preferences.
- **Third-Party Cookies:** Which may be installed by external services integrated into the website.

Detailed information regarding the types of cookies used, their purposes, retention periods and the methods available for managing user preferences is provided in the Company's **Cookie Policy**, available through the relevant section of the website.

Users may modify their cookie preferences at any time through the website's **Cookie Consent Banner**, where available, or by adjusting the settings of their internet browser.

7. RECIPIENTS OF PERSONAL DATA

Empower Consulting Limited processes personal data with the utmost confidentiality and implements appropriate measures to ensure its protection.

Personal data will not be sold, transferred or disclosed to third parties for commercial or marketing purposes.

Where necessary to fulfil the purposes described in this Privacy Policy, personal data may be disclosed solely to the following categories of recipients:

- **Employees:** Authorized personnel, consultants and representatives of Empower Consulting Limited who are duly authorized to process personal data within the scope of their respective duties and responsibilities.
- **Providers of information technology:** Hosting, cloud computing, system maintenance and technical support services.
- **Professional advisers:** Including accountants, auditors, legal advisers and other consultants engaged by the Company.
- **Banks and financial institutions** where required for the performance of contractual obligations.
- **Public authorities:** Government bodies, regulatory authorities or other competent authorities where disclosure is required by law or pursuant to a legally binding request.

Any third-party processing personal data on behalf of Empower Consulting Limited is required to implement appropriate safeguards to ensure the protection of personal data and to comply with all applicable data protection legislation.

Personal data will be disclosed only to the extent strictly necessary for the purposes for which it was originally collected.

8. INTERNATIONAL TRANSFER OF PERSONAL DATA

Empower Consulting Limited may process and store personal data using secure information technology systems and cloud-based services provided by qualified third-party service providers, implementing appropriate technical and organizational measures to ensure an adequate level of security.

In the course of its business activities, personal data may be transferred to, or accessed from, locations outside Gibraltar where such transfer is necessary for the provision of services, the management of business relationships or the use of corporate information technology platforms.

In particular, Empower Consulting Limited uses Microsoft 365 services, including Outlook, OneDrive and Microsoft Teams, for the management of corporate communications, electronic documentation and internal collaboration.

Where the processing of personal data involves international data transfers, such transfers will be carried out exclusively in accordance with the applicable legislation and subject to the safeguards required under the

Gibraltar General Data Protection Regulation (Gibraltar GDPR) to ensure an adequate level of protection for personal data.

Empower Consulting Limited takes all reasonable measures to ensure that personal data is processed securely and in accordance with this Privacy Policy.

9. Data Retention

Empower Consulting Limited retains personal data only for as long as necessary to fulfil the purposes for which it was collected, in accordance with applicable legislation and any legal retention obligations.

In particular:

Category of Personal Data	Retention Period
Website enquiries and email communications	Up to 24 months following the last communication, unless a contractual relationship is established
Client and contractual records	Throughout the duration of the contractual relationship and thereafter for the period required by applicable legal obligations
Supplier records	Throughout the duration of the commercial relationship and thereafter for the period required by applicable legal obligations
Administrative, accounting and financial records	For the period required under applicable legislation
Curriculum Vitae (CVs) and unsolicited job applications	Up to 12 months from the date of receipt, unless the data subject provides renewed consent
Technical logs and website security data	For the period strictly necessary to ensure the security and proper operation of the Company's information systems

Upon expiry of the applicable retention period, personal data will be securely deleted, anonymized or retained only where required by law or where necessary for the establishment, exercise or defense of legal claims.

10. PERSONAL DATA SECURITY

Empower Consulting Limited implements appropriate technical, organizational and administrative measures to safeguard personal data against unauthorized access, loss, destruction, alteration, disclosure or any unlawful processing.

The security measures adopted are proportionate to the nature of the personal data processed, the risks associated with the processing activities and the characteristics of the Company's operations.

Examples of such measures include:

- The use of secure information technology systems and cloud-based platforms for the management of corporate communications and documentation;
- The use of Microsoft 365 services, including Outlook, OneDrive and Microsoft Teams, for the secure management of communications and electronic records;
- Protection of corporate devices through individual user authentication and password-controlled access;
- The use of regularly updated antivirus software on corporate devices;
- The use of secure network connections and, where appropriate, Virtual Private Network (VPN) services to protect remote communications;
- Restricting access to personal data exclusively to authorized personnel who require such access in the performance of their duties;
- Regular updating of information systems, software applications and security measures;
- The implementation of organizational procedures designed to prevent unauthorized access, accidental loss, alteration or unauthorized disclosure of personal data.

Empower Consulting Limited also promotes awareness of personal data protection and information security among its personnel through internal procedures and, where appropriate, training and awareness initiatives.

Should a personal data breach occur ("Data Breach"), the Company will implement all measures required under the applicable legislation, including assessment of the incident, implementation of appropriate corrective actions and, where required, notification to the competent supervisory authority and the affected data subjects.

11. DATA SUBJECT RIGHTS

Under the Gibraltar General Data Protection Regulation (Gibraltar GDPR), every data subject has the right to obtain information regarding the processing of their personal data and to exercise the rights granted under the applicable data protection legislation.

In particular, data subjects are entitled to exercise the following rights.

11.1 RIGHT OF ACCESS

To obtain confirmation as to whether or not personal data relating to them is being processed and, where applicable, to receive a copy of such personal data together with information concerning the purposes of processing, the categories of personal data processed, the recipients of the data and the applicable retention period.

11.2 RIGHT TO RECTIFICATION

To request the correction or updating of inaccurate or incomplete personal data.

11.3 RIGHT TO ERASURE

To request the deletion of personal data ("Right to be Forgotten") in the circumstances provided for under the applicable legislation.

11.4 RIGHT TO RESTRICTION OF PROCESSING

To request the restriction of the processing of personal data in the cases provided for by applicable law.

11.5 RIGHT TO DATA PORTABILITY

To receive the personal data provided to Empower Consulting Limited in a structured, commonly used and machine-readable format and, where technically feasible, to request that such data be transmitted to another Data Controller.

11.6 RIGHT TO OBJECT

To object, on grounds relating to their particular situation, to the processing of personal data carried out on the basis of the legitimate interests pursued by the Data Controller, unless compelling legitimate grounds exist to continue such processing.

11.7 WITHDRAWAL OF CONSENT

Where the processing of personal data is based on consent, the data subject has the right to withdraw such consent at any time. Withdrawal of consent shall not affect the lawfulness of any processing carried out prior to its withdrawal.

11.8 RIGHT TO LODGE A COMPLAINT

Where a data subject believes that the processing of their personal data infringes the applicable data protection legislation, they have the right to lodge a complaint with the competent Gibraltar Data Protection Authority or to seek judicial remedies before the competent courts.

Any of the rights described above may be exercised at any time by contacting Empower Consulting Limited using the contact details provided in this Privacy Policy.

12. CONTACT DETAILS

For any questions regarding this Privacy Policy or to exercise any rights relating to the processing of personal data, data subjects may contact the Data Controller using the details below:

EMPOWER CONSULTING LIMITED

Company Registration No.: 124524

Registered Office:

Eurocity, Unit G02

Europort Avenue

Gibraltar GX11 1AA

Gibraltar

Email: info@empowerconsultingltd.com

Website: <https://www.empowerconsultingltd.com>

Empower Consulting Limited is committed to responding to requests from data subjects within the timeframes established by the applicable data protection legislation.

13. CHANGES TO THIS PRIVACY POLICY

Empower Consulting Limited reserves the right to amend or update this Privacy Policy at any time in order to reflect changes in applicable legislation, organizational requirements, technological developments or the services provided through the Company's website.

The most recent version of this Privacy Policy will be published on this page together with the relevant revision date.

Users are therefore encouraged to review this Privacy Policy periodically to remain informed of any updates.

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