



**KASTLEWAY**  
GROUP

**KASTLEWAY LAW LTD & KASTLEWAY COMPLIANCE LTD.**

**PRIVACY POLICY**

**JANUARY 2025**



## Table of Contents

1	Introduction .....	2
2	Types of Information Collected .....	2
2.1	Personal Information You Provide Voluntarily .....	2
2.2	Information Collected From Third-Party Sources .....	3
3	How We Use and Share Information .....	3
4	Legal Grounds for Using Personal Information.....	3
5	Measures to Protect and Safely Store Information.....	3
6	Retention of Information.....	4
7	Your Choices and Rights.....	4
8	How to Contact Us .....	4
9	Complaints and Dispute Resolution.....	4
10	Changes to This Privacy Policy .....	4

---

## 1 Introduction

Kastleway Group consists of Bermudan limited liability companies Kastleway Compliance Ltd., a consulting company, and Kastleway Law Ltd, a law firm that regulated under the Bermuda Bar Act 1974. Kastleway Group provides legal advice and consulting services to ensure regulatory compliance with the Bermuda legal framework in place to prevent, detect and deter financial crime.

Kastleway ("we," "us," or "our") is committed to safeguarding the privacy and personal information of individuals ("you" or "your") that we collect in the course of operating our business and providing services. This Privacy Policy explains:

- What types of personal information we collect;
- How we use and share this information;
- Your choices and rights regarding your personal information.

This Privacy Policy aligns with the Personal Information Protection Act (PIPA) of Bermuda and applies to all Kastleway entities.

## 2 Types of Information Collected

### 2.1 Personal Information You Provide Voluntarily

We may collect the following types of personal information when you provide it directly to us:

- **Identification Information:** Name, date of birth, passport details, or driver's license.



- **Contact Information:** Email address, phone numbers, and mailing address.
- **Employment and Professional Details:** Job title, employer, and professional qualifications.
- **Financial Information:** Bank details, credit history, and payment information.
- **Demographic Information:** Preferences and interests.

## 2.2 Information Collected From Third-Party Sources

We may also collect information about you from:

- Publicly available sources;
- Your employer or associates in connection with services provided to your organization;
- Social media platforms, subject to their privacy policies.

## 3 How We Use and Share Information

We use your personal information for the following purposes:

- To provide and improve our services;
- To comply with legal and regulatory obligations;
- To send you marketing communications, subject to your preferences;
- For internal operations such as data analysis, fraud prevention, and staff training.

We may share your information with:

- Kastleway employees and authorized contractors;
- Third-party service providers, such as IT, marketing, and legal advisors;
- Regulators, law enforcement, or other entities as required by law.

## 4 Legal Grounds for Using Personal Information

Under PIPA, we rely on the following lawful grounds:

- **Consent:** When you explicitly agree to the use of your personal information.
- **Contractual Necessity:** To fulfill obligations under a contract with you.
- **Legal Obligation:** To comply with regulatory requirements.
- **Legitimate Interests:** For our business purposes, such as improving services, provided it does not override your privacy rights.

## 5 Measures to Protect and Safely Store Information

We implement robust measures to ensure the confidentiality, integrity, and availability of your personal information, including:

- Encryption and secure storage systems;
- Access controls to limit who can view your information;
- Regular audits and training for staff on privacy and security practices.



## 6 Retention of Information

We retain your personal information only for as long as necessary to fulfill the purposes for which it was collected or as required by law.

## 7 Your Choices and Rights

Under PIPA, you have the right to:

- Access your personal information;
- Request corrections to inaccuracies;
- Withdraw consent where processing is based on consent;
- Request deletion of your data, subject to legal obligations.

To exercise your rights, contact us using the information provided in Section 8.

## 8 How to Contact Us

For questions or concerns about this Privacy Policy or our data practices, please contact:

**Kastleway Data Privacy Officer - Monika Adams**

PO Box 3280

Hamilton HMPX

Bermuda

Email: [monika.adams@kastleway.com](mailto:monika.adams@kastleway.com)

Phone: +14415955055

## 9 Complaints and Dispute Resolution

If you believe your rights under PIPA have been violated, you may file a complaint with:

**Office of the Privacy Commissioner for Bermuda**

Website: [www.privacy.bm](http://www.privacy.bm)

Alternatively, contact us directly to resolve your concerns.

## 10 Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable laws. The latest version will always be available on our website, and we will notify you of significant changes.

**Effective Date:** 01 January 2025