

PRIVACY POLICY

La Corona Investments Company Limited

Company Registration Number: C 75575

VAT Registration Number: MT29711723

Website: <https://coronainvestmentsco.com/>

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1. Introduction

La Corona Investments Company Limited ("the Company", "we", "us", or "our") is committed to protecting and respecting the privacy of individuals whose personal data we process. We recognise that the protection of personal data is both a legal obligation and a matter of trust that is fundamental to the way we conduct our business.

This Privacy Policy explains how we collect, use, store, share, and protect your personal data when you visit our website at <https://coronainvestmentsco.com/> (the "Website"), when you engage with our services, or when you otherwise interact with us in the course of our business activities.

This Privacy Policy is issued in compliance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (the "General Data Protection Regulation" or "GDPR");
- The Data Protection Act, Chapter 586 of the Laws of Malta (the "DPA");
- Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector (the "ePrivacy Directive"), as transposed into Maltese law by the Electronic Communications (Regulation) Act (Chapter 399 of the Laws of Malta) and subsidiary legislation thereunder; and
- Any guidelines, recommendations, or binding decisions issued by the Office of the Information and Data Protection Commissioner ("IDPC") and the European Data Protection Board ("EDPB").

We encourage you to read this Privacy Policy carefully and in its entirety. If you have any questions, please do not hesitate to contact us using the details provided in Section 16 below.

2. Who We Are — Data Controller Information

For the purposes of the GDPR and the DPA, the data controller responsible for the processing of your personal data is:

Company Name:	La Corona Investments Company Limited
Registration Number:	C 75575
VAT Number:	MT29711723
Registered Address:	2 Spinola Road, St. Julians, STJ 3014, Malta
Telephone:	005552938600
Email:	sporras@lacentral.com.mx

As the data controller, we determine the purposes and means of the processing of your personal data and are responsible for ensuring that such processing is carried out in accordance with applicable data protection legislation.

3. Scope of This Privacy Policy

This Privacy Policy applies to all personal data processed by the Company in connection with:

- Your use of our Website, including browsing, submitting enquiries, or interacting with any features or functionalities available on the Website;
- Your engagement with our investment services;
- Your participation in our international business activities;
- Transactions involving the purchase and sale of value-added wood products;
- Any correspondence, communications, or other interactions with us, whether conducted online, by telephone, by email, or in person; and
- Any contractual or pre-contractual relationship between you and the Company.

This Privacy Policy applies regardless of the means through which personal data is collected and whether it is collected directly from you or from third-party sources.

4. Personal Data We Collect

Depending on the nature of your interaction with us, we may collect and process the following categories of personal data:

4.1 Identity and Contact Data

- Full name (first name, surname)
- Date of birth
- Nationality
- Government-issued identification document details (passport number, identity card number)
- Postal address
- Email address
- Telephone number(s)

4.2 Business and Financial Data

- Company name and registration details (where applicable)
- Job title and professional role
- Business address and contact details
- Bank account details and payment information
- Transaction history and records
- Investment preferences and risk profiles
- Tax identification numbers

4.3 Technical and Usage Data

- IP address
- Browser type and version

- Operating system and device information
- Pages visited on our Website and time spent on each page
- Referring website or source through which you accessed our Website
- Cookie identifiers and similar tracking data (see Section 11)
- Date and time of access

4.4 Communication Data

- Content of emails, messages, or other correspondence with us
- Records of telephone conversations (where applicable and with prior notice)
- Feedback, complaints, or enquiries submitted through the Website or by other means

4.5 Compliance and Due Diligence Data

- Information collected for anti-money laundering (AML) and know-your-customer (KYC) purposes
- Politically exposed person (PEP) status
- Sanctions screening results
- Source of funds and source of wealth documentation

5. How We Collect Your Personal Data

We collect your personal data through the following means:

5.1 Directly from You

When you provide information to us directly, for example by contacting us via our Website, by telephone, by email, or in person; when you enter into a contractual relationship with us; when you submit enquiries; or when you provide documentation in the context of due diligence processes.

5.2 Automatically through the Website

When you visit our Website, certain technical and usage data is collected automatically through cookies, analytics tools, and similar technologies. Please refer to Section 11 for further details.

5.3 From Third-Party Sources

In certain circumstances, we may receive personal data about you from third parties, including business partners, referral sources, publicly accessible databases, credit reference agencies, government authorities, and other entities with whom we have a legitimate business relationship.

6. Purposes and Legal Bases for Processing

We process your personal data only where we have a lawful basis to do so under Article 6(1) of the GDPR. The table below sets out the purposes for which we process your personal data, the categories of data involved, and the legal basis upon which we rely:

Purpose of Processing	Categories of Data	Legal Basis (Art. 6(1) GDPR)
Provision of investment services and management of client relationships	Identity, Contact, Business & Financial, Compliance Data	Performance of a contract (Art. 6(1)(b)); Compliance with legal obligations (Art. 6(1)(c))
Facilitating the purchase and sale of value-added wood products	Identity, Contact, Business & Financial Data	Performance of a contract (Art. 6(1)(b)); Legitimate interests (Art. 6(1)(f))
Conducting international business transactions	Identity, Contact, Business & Financial Data	Performance of a contract (Art. 6(1)(b)); Legitimate interests (Art. 6(1)(f))
Responding to enquiries and managing communications	Identity, Contact, Communication Data	Legitimate interests (Art. 6(1)(f)); Consent (Art. 6(1)(a)) where applicable
Compliance with AML/KYC and other regulatory obligations	Identity, Contact, Compliance & Due Diligence Data	Compliance with legal obligations (Art. 6(1)(c))
Website analytics and performance improvement	Technical and Usage Data	Consent (Art. 6(1)(a)); Legitimate interests (Art. 6(1)(f))
Marketing and promotional communications (where applicable)	Identity, Contact Data	Consent (Art. 6(1)(a))
Establishment, exercise, or defence of legal claims	All categories as necessary	Legitimate interests (Art. 6(1)(f))

Where we rely on legitimate interests as a legal basis, we have carried out a balancing assessment to ensure that our interests are not overridden by your rights and freedoms. You have the right to object to processing based on legitimate interests at any time.

Where we rely on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing carried out prior to the withdrawal.

7. Recipients and Disclosure of Personal Data

We may share your personal data with the following categories of recipients, strictly to the extent necessary for the purposes described in this Privacy Policy:

- **Professional Advisers:** Our legal advisers, accountants, auditors, and other professional service providers who assist us in the conduct of our business and who are bound by professional obligations of confidentiality.
- **Regulatory and Governmental Authorities:** The IDPC, the Malta Financial Services Authority (MFSA), the Financial Intelligence Analysis Unit (FIAU), and other regulatory or governmental authorities where disclosure is required by law or regulation.
- **Business Partners and Counterparties:** Parties with whom we conduct business transactions, including suppliers, purchasers, and intermediaries in the wood products supply chain and investment activities.

- **IT and Website Service Providers:** Third-party providers who host our Website, provide analytics services, or otherwise support our IT infrastructure (e.g., GoDaddy as our website hosting provider). These providers act as data processors and are contractually bound to process your data only on our instructions and in compliance with the GDPR.
- **Banking and Financial Institutions:** Banks and payment service providers involved in the processing of financial transactions.

We do not sell your personal data to any third party. We will never share your personal data with third parties for their own marketing purposes without your explicit consent.

8. International Transfers of Personal Data

Given the international nature of our business activities, your personal data may be transferred to, and processed in, countries outside the European Economic Area ("EEA"). Where such transfers occur, we ensure that appropriate safeguards are in place to protect your personal data in accordance with Article 46 of the GDPR. These safeguards may include:

- Transfers to countries that have been recognised by the European Commission as providing an adequate level of data protection (Article 45 GDPR);
- The use of Standard Contractual Clauses ("SCCs") approved by the European Commission (Article 46(2)(c) GDPR);
- Binding Corporate Rules (Article 47 GDPR), where applicable; or
- Your explicit consent to the transfer, where appropriate and after having been informed of the possible risks.

You may request a copy of the safeguards in place in relation to any international transfer of your personal data by contacting us using the details in Section 16.

9. Data Retention

We retain your personal data only for as long as is necessary to fulfil the purposes for which it was collected and to comply with our legal, regulatory, and contractual obligations. The retention period applicable to your personal data will depend on the nature of the data and the purposes for which it is processed.

As a general guide:

- **Contractual and transactional data:** Retained for the duration of the contractual relationship and for a period of 10 years thereafter, in accordance with Maltese commercial and tax legislation.
- **AML/KYC and compliance data:** Retained for a minimum of 5 years from the end of the business relationship or the completion of the transaction, in accordance with the Prevention of Money Laundering Act (Chapter 373 of the Laws of Malta) and subsidiary legislation.
- **Website analytics and cookie data:** Retained in accordance with the lifespans of the respective cookies. See Section 11 for details.

- **Communication records:** Retained for as long as necessary to manage the enquiry or relationship and, where relevant, for the establishment, exercise, or defence of legal claims.
- **Marketing consent records:** Retained for the duration of the consent and for a reasonable period thereafter to evidence compliance.

At the end of the applicable retention period, personal data will be securely deleted, anonymised, or destroyed in accordance with our data retention and disposal procedures.

10. Your Rights as a Data Subject

Under the GDPR and the DPA, you have the following rights in relation to your personal data. These rights are not absolute and may be subject to conditions or limitations as provided by law:

- **Right of Access (Article 15 GDPR):** You have the right to request confirmation as to whether we process your personal data and, if so, to access a copy of such data and information about how it is processed.
- **Right to Rectification (Article 16 GDPR):** You have the right to request the correction of inaccurate personal data and the completion of incomplete personal data.
- **Right to Erasure (Article 17 GDPR):** You have the right to request the deletion of your personal data in certain circumstances, for example where the data is no longer necessary for the purposes for which it was collected or where you withdraw consent.
- **Right to Restriction of Processing (Article 18 GDPR):** You have the right to request that we restrict the processing of your personal data in certain circumstances, for example where you contest the accuracy of the data.
- **Right to Data Portability (Article 20 GDPR):** Where processing is based on consent or contract and is carried out by automated means, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to transmit it to another data controller.
- **Right to Object (Article 21 GDPR):** You have the right to object to the processing of your personal data where such processing is based on our legitimate interests. We will cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms.
- **Right to Withdraw Consent (Article 7(3) GDPR):** Where processing is based on your consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.
- **Rights related to Automated Decision-Making (Article 22 GDPR):** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such processing is authorised by law or based on your explicit consent.

To exercise any of these rights, please contact us using the details set out in Section 16 below. We will respond to your request within one (1) month of receipt, in accordance with Article 12(3) of the GDPR. This period may be extended by a further two (2) months where necessary, taking into account the complexity and number of requests.

We may request specific information from you to verify your identity before processing your request, in order to protect your personal data from unauthorised access.

11. Cookies and Tracking Technologies

Our Website uses cookies and similar tracking technologies. Cookies are small text files that are placed on your device when you visit our Website. They serve various purposes, including enabling the Website to function correctly, improving your browsing experience, and providing us with analytical information about how the Website is used.

11.1 Types of Cookies We Use

Type of Cookie	Purpose	Duration
Strictly Necessary Cookies	Essential for the Website to function properly. These cookies do not require consent.	Session / Persistent
Analytics Cookies	Used to collect information about how visitors use our Website, including the number of visitors, the pages visited, and the source of traffic. This information helps us improve the Website's performance.	Up to 2 years
Functional Cookies	Used to remember your preferences and settings, such as language preferences.	Up to 1 year
Third-Party Cookies	Cookies set by third-party services embedded on our Website, such as analytics providers (e.g., Google Analytics, if applicable).	Varies by provider

11.2 Managing Cookies

When you first visit our Website, you will be presented with a cookie consent banner that allows you to accept or reject non-essential cookies. You may change your cookie preferences at any time by adjusting your browser settings or by using the cookie management tool on our Website (if available).

You can also control cookies through your browser settings. Most browsers allow you to refuse or delete cookies. Please note that if you disable or refuse cookies, some parts of the Website may not function correctly or may become inaccessible.

For more information about cookies and how to manage them, please visit www.allaboutcookies.org.

12. Security of Your Personal Data

We take the security of your personal data seriously and have implemented appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing, accidental loss, destruction, or damage, in accordance with Article 32 of the GDPR.

These measures include, but are not limited to:

- Encryption of data in transit using Secure Sockets Layer (SSL) / Transport Layer Security (TLS) technology;
- Access controls to limit access to personal data to authorised personnel on a need-to-know basis;
- Regular review and updating of security measures to address emerging threats and vulnerabilities;
- Contractual obligations imposed on third-party service providers (data processors) to implement appropriate security measures; and
- Staff awareness and training on data protection and information security obligations.

While we strive to protect your personal data, no method of transmission over the internet or method of electronic storage is completely secure. We cannot guarantee the absolute security of your data, but we are committed to taking all reasonable steps to minimise risks.

13. Children's Privacy

Our Website and services are not directed at individuals under the age of 18. We do not knowingly collect personal data from children. If you are a parent or guardian and become aware that your child has provided us with personal data, please contact us using the details in Section 16, and we will take steps to delete such data.

14. Links to Third-Party Websites

Our Website may contain links to third-party websites that are not operated by us. We have no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party websites. We strongly encourage you to review the privacy policies of any third-party websites you visit.

15. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our processing activities, legal requirements, or best practices. Any changes will be published on this page with an updated "Last Updated" date. Where changes are material, we will take reasonable steps to notify you, for example by displaying a prominent notice on our Website.

We encourage you to review this Privacy Policy periodically to stay informed about how we are protecting your personal data.

16. How to Contact Us

If you have any questions, concerns, or requests regarding this Privacy Policy or our processing of your personal data, please contact us using the following details:

Company:	La Corona Investments Company Limited
Address:	2 Spinola Road, St. Julians, STJ 3014, Malta
Telephone:	005552938600
Email:	sporras@lacentral.com.mx

We will endeavour to address your enquiry or request promptly and, in any event, within the timeframes prescribed by applicable data protection legislation.

17. How to Lodge a Complaint

If you are dissatisfied with the way in which we have handled your personal data or your request to exercise any of your rights, you have the right to lodge a complaint with the supervisory authority in Malta:

Supervisory Authority:	Office of the Information and Data Protection Commissioner (IDPC)
Address:	Floor 2, Airways House, High Street, Sliema, SLM 1549, Malta
Telephone:	+356 2328 7100
Website:	https://idpc.org.mt

You also have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or the place where the alleged infringement of the GDPR occurred.

We would, however, appreciate the opportunity to address your concerns before you approach the supervisory authority, and we invite you to contact us in the first instance.