

SOMASI Corporate Services Ltd.

Privacy Policy

Effective date: August 1, 2026

Last updated: August 3, 2026

SOMASI Corporate Services Ltd. ("SOMASI", "we", "us" or "our") is a licensed company management and fiduciary services firm based in the British Virgin Islands. We take the privacy of the people we deal with seriously, and we handle personal information with the same care and discretion we apply to every client engagement.

This Privacy Policy explains how we collect, use, disclose and protect personal information when you visit www.somasicorp.com (the "website"), contact us, or use our services. It also sets out the rights available to you and how to exercise them.

We process personal information in line with the **Data Protection Act, 2021 of the British Virgin Islands (the "BVI DPA")**, which is the primary law that governs how we handle personal data. Where we deal with individuals in other jurisdictions, we also take account of the data protection requirements that apply there, including the EU General Data Protection Regulation ("GDPR") where relevant.

By using the website or providing personal information to us, you confirm that you have read and understood this policy.

Who we are and how to reach us

SOMASI Corporate Services Ltd. is the data controller responsible for the personal information described in this policy. We decide why and how that information is processed.

You can contact us about privacy matters using the details below:

- By email: solutions@somasicorp.com
- By phone: +1 (284) 394-9230
- By mail: 2nd Floor, O'Neal Building, 78 Main Street, P.O. Box 2132, Road Town, Tortola, British Virgin Islands

If you have a specific question about your personal information, please mark it for the attention of our data protection contact so it reaches the right person promptly.

Information we collect

The information we collect depends on how you interact with us. It falls into the following categories.

Information you give us

You may provide personal information when you complete a contact or enquiry form, request a proposal, engage us for services, correspond with us by email or phone, or subscribe to updates. This may include:

- Your name and the name of any entity you represent.

- Contact details, including email address, telephone number and mailing address.
- Your role, profession or relationship to a structure (for example, whether you are a private client, a director, a beneficial owner or a professional intermediary).
- The content of any message or enquiry you send us, and any documents you choose to share.

Information collected as part of providing our services

Because of the nature of fiduciary, company management and compliance work, and our obligations under British Virgin Islands law, we may collect additional information from clients and connected parties during an engagement. Depending on the service, this can include identification and verification documents, proof of address, source of funds and source of wealth information, and details required for anti-money laundering and counter-financing of terrorism (AML/CFT) checks, economic substance, and FATCA/CRS reporting.

We collect this information to meet our legal and regulatory obligations and to deliver the services you have asked us to provide. Where this policy and a specific client engagement agreement differ on how client information is handled, the terms of the engagement agreement apply to that information.

Information we collect automatically

When you visit the website, we may automatically collect limited technical information, sometimes called usage data. This may include:

- Your Internet Protocol (IP) address and general location derived from it.
- Browser type and version, and device information.
- The pages you view, the time and date of your visit, and time spent on pages.
- The website that referred you to us, and diagnostic data used to keep the site working.

Cookies and similar technologies

The website uses cookies and similar technologies. A cookie is a small file placed on your device that helps the site function and helps us understand how the site is used.

We use cookies for the following purposes:

- Essential cookies that are necessary for the website to operate.
- Preference cookies that remember your settings and choices.
- Analytics cookies that help us understand how visitors use the site so we can improve it.
- Advertising and marketing cookies that support the activities described below.

Analytics and advertising technologies

We use third party technologies from Google and LinkedIn, including tracking pixels and tags, to understand how the website is used and to reach people who have visited the site. These tools may set cookies or use similar identifiers to recognise your device and browser.

Among other things, these technologies allow us to measure website traffic and performance, and to show you SOMASI content or advertisements on Google and LinkedIn services, or on other sites and platforms, after you have visited our website. This is a common practice sometimes called remarketing or retargeting. Google and

LinkedIn act as separate controllers of the information they collect through these tools, and their own privacy policies govern how they use it. We encourage you to review them.

Where required, we rely on your consent for these advertising and analytics technologies, and you can withdraw that consent at any time. You can also opt out through your browser cookie settings, through Google's and LinkedIn's own advertising controls, and through general opt-out tools offered by the digital advertising industry.

You can set your browser to refuse some or all cookies, or to alert you when a cookie is being set. If you disable certain cookies, some parts of the website may not work as intended.

How we use your information

We use personal information for the following purposes:

- To respond to your enquiries and provide information you have requested.
- To provide, manage and administer the services we deliver to you or the entities you are connected to.
- To carry out client due diligence and meet our AML/CFT, economic substance, FATCA/CRS and other regulatory and legal obligations.
- To maintain accurate records and manage our relationship with you.
- To operate, maintain, secure and improve the website.
- To send you regulatory updates, insights or other communications where you have asked to receive them or where we are permitted to do so.
- To measure the performance of the website and our marketing, and to show relevant SOMASI content or advertisements to people who have visited the website, including through Google and LinkedIn.
- To detect, prevent and address technical issues, fraud or misuse.
- To establish, exercise or defend legal claims, and to comply with applicable law and the directions of regulators and courts.

Our legal basis for processing

Under the BVI DPA, and under the GDPR where it applies, we process personal information only where we have a lawful basis to do so. Depending on the situation, our basis will be one or more of the following:

- Performance of a contract with you, or to take steps at your request before entering into a contract.
- Compliance with a legal or regulatory obligation, including our obligations as a licensed fiduciary and company management firm.
- Our legitimate interests, such as running and improving our business and the website, where those interests are not overridden by your rights.
- Your consent, where we have asked for it, for example to send you marketing or optional communications. You can withdraw consent at any time.

How we share your information

We do not sell your personal information. We share it only where necessary and with appropriate safeguards. This may include sharing with:

- Service providers who support our operations, such as IT, hosting, communications, professional advisers and verification providers, who process information on our behalf under confidentiality obligations.
- Regulators, tax authorities, registries and other government bodies where we are required or permitted to report or disclose information, including the BVI Financial Services Commission and authorities relevant to AML/CFT, economic substance and FATCA/CRS.
- Banks, auditors, and other parties involved in a structure or transaction, where this is necessary to deliver the service.
- Law enforcement, courts or other third parties where disclosure is necessary to comply with the law, respond to lawful requests, or protect our rights, property or safety and those of others.

We require those who process personal information on our behalf to protect it and to use it only for the purposes we specify.

International transfers

We are based in the British Virgin Islands, and information you provide will be processed there. Because we serve international clients and use service providers in different countries, your information may be transferred to and stored in jurisdictions with data protection laws that differ from those where you are located.

Where we transfer personal information across borders, we take steps reasonably necessary to ensure it remains protected and handled in line with this policy and applicable law. By providing information to us, you understand that it may be transferred and processed in this way.

How long we keep your information

We keep personal information only for as long as necessary for the purposes set out in this policy. For clients and connected parties, we are required by British Virgin Islands law to retain certain records, including due diligence and transaction records, for defined minimum periods after an engagement ends. We retain other information for as long as needed to manage our relationship with you, resolve disputes, and meet our legal, regulatory and accounting obligations.

Usage data collected through the website is generally kept for shorter periods, except where we need it for longer to support security, functionality or legal requirements. When information is no longer needed, we take steps to delete it securely or anonymise it.

How we protect your information

We apply appropriate technical and organisational measures to protect personal information against loss, misuse, unauthorised access and disclosure. Discretion and confidentiality are central to how we work. That said, no method of transmission over the internet or method of electronic storage is completely secure, and we cannot guarantee absolute security. If you have reason to believe your interaction with us is no longer secure, please contact us straight away.

Your rights

Subject to the BVI DPA, and to the GDPR and other laws where they apply, you have rights in relation to your personal information. These may include:

- Access. The right to ask what personal information we hold about you and to obtain a copy of it.
- Correction. The right to have inaccurate or incomplete information corrected.
- Deletion. The right to ask us to delete your information, where we are not required to keep it.
- Objection and restriction. The right to object to, or ask us to restrict, certain processing of your information.
- Portability. The right, in some cases, to receive information you gave us in a structured, commonly used format.
- Withdrawing consent. The right to withdraw consent at any time where we rely on it, without affecting processing already carried out.

To exercise any of these rights, please contact us using the details in this policy. We may need to verify your identity before we act on a request. Please note that some rights are limited where we are legally required to retain information, for example to meet our regulatory and record-keeping obligations.

If you are in the EEA and have concerns about how we handle your information, you have the right to complain to your local data protection authority. We would welcome the chance to address your concerns directly first.

Links to other websites

The website may contain links to sites operated by others. We are not responsible for the content or privacy practices of those sites, and this policy does not apply to them. We encourage you to review the privacy policy of any site you visit.

Children's privacy

The website and our services are intended for adults and are not directed at children under the age of 18. We do not knowingly collect personal information from children. If you believe a child has provided us with personal information, please contact us and we will take appropriate steps to remove it.

Changes to this policy

We may update this policy from time to time to reflect changes in our practices, technology or the law. When we do, we will post the updated version on this page and revise the effective date above. Where a change is significant, we may provide additional notice. We encourage you to review this page periodically.

Contact us

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