



## Data Protection Notice

**Last updated:** 9<sup>th</sup> March 2026

This Data Protection Notice explains how **Manilujo Limited (we, us, our)** collects and uses personal data.

For data protection purposes, we act as a **controller** in respect of personal data processed for our business.

**Company:** Manilujo Limited

**Registered office:** 19 Ballabrooie Grove, Douglas, IM1 4ET, Isle of Man

**Data protection officer:** Mario Ricciardi

**Email:** mario@manilujo.com

**Telephone:** +44 7624 362780

### You have the right to ask us:

- whether we process your personal data;
- for a copy of your personal data; and
- for information about how and why we process it (as set out below).

### Why we process personal data – the purpose

We process personal data mainly to provide consultancy services to help businesses scope and develop their proposed operations, incorporate an Isle of Man company where required, and prepare, support and submit applications to the **Isle of Man Financial Services Authority** (including for **Class 8 electronic money transmission services licences**), together with the associated compliance and corporate documentation, staffing and premises support, and related services, through to completion and handover to the company and its officers.

We also process personal data for:

- client onboarding and due diligence;
- communicating with you and managing matters and enquiries;
- preparing and submitting regulatory-related documentation (where instructed/appropriate);
- billing, accounting, and administration;
- compliance with legal and regulatory obligations; and
- preventing fraud and protecting our business.

### Categories of personal data we process

Depending on the relationship, we may process:

- **Identity and contact details:** name, job title, employer, postal address, email address, telephone number.
- **Matter and communications data:** instructions, correspondence, meeting notes, advice and documents related to a matter.
- **Due diligence data:** proof of identity and proof of address and related verification outcomes.
- **Billing and payment data:** invoicing details, payment references and transaction records.
- **Technical data (if you use our website):** IP address, device and browser details, website usage data, cookies.

We do not seek to collect special category data (for example health data) unless it is necessary, and you choose to provide it.

### Who we share personal data with

We may share personal data (where necessary) with:



- you, and your authorised representatives;
- regulators and public authorities where relevant to the work (including the Isle of Man Financial Services Authority);
- professional advisers and third parties involved in a matter (for example legal advisers or accountants) where appropriate;
- our service providers (for example IT, email, cloud storage, and document management providers);
- banks and payment providers; and
- insurers (including professional indemnity insurers).

We only share what is necessary for the relevant purpose.

### **International transfers**

We may transfer personal data outside the Isle of Man. Where required, we put appropriate safeguards in place.

### **How long we keep personal data – retention period**

We keep personal data only for as long as necessary for the purpose for which it was collected, including legal, regulatory, accounting and reporting requirements.

We determine retention periods with reference to, but not limited to:

- the **Anti-Money Laundering and Countering the Financing of Terrorism Code 2019**;
- the **Limitation Act 1984**; and
- the **Data Protection Act 2018** (Isle of Man).

After the retention period, we may securely delete or anonymise the data.

### **Your rights**

Depending on the circumstances, you may have the right to:

- access your personal data and obtain a copy;
- correct inaccurate or incomplete personal data;
- request deletion of personal data;
- restrict processing of your personal data;
- object to processing;
- request data portability;
- withdraw consent where we rely on consent; and
- where your personal data is transferred to a third country or an international organisation, be informed of the appropriate safeguards in place relating to that transfer.

### **How to make a request**

To make an access request or exercise any of your rights, contact us using the details at the top of this notice.

We may ask for information to confirm your identity and to help us locate the data.

### **Complaints**

You have the right to complain to the Isle of Man Information Commissioner.

**Address:** Isle of Man Information Commissioner, P.O. Box 69, Douglas, Isle of Man, IM99 1EQ

**Telephone:** +44 1624 693260

**Email:** [ask@inforights.im](mailto:ask@inforights.im)

**Website:** <https://inforights.im>



## Where we obtain personal data (if not from you)

Where we do not obtain personal data directly from you, we may obtain it from:

- your authorised representatives;
- your advisers or agents;
- counterparties and their advisers;
- regulators/authorities; and
- public sources.

## Automated decision-making and profiling

We do **not** use automated decision-making, including profiling, in respect of you or your personal data.

## Lawful bases we rely on

We will process personal data only where we have a lawful basis. Common lawful bases include:

- **Contract:** where processing is necessary to provide our services or take steps at your request.
- **Legal obligation:** where we must comply with legal or regulatory requirements.
- **Legitimate interests:** where processing is necessary for our legitimate interests (such as running our business, communicating with contacts, managing risk, and preventing fraud).
- **Consent:** where we ask for your consent (typically for optional marketing), you can withdraw at any time.

## Whether you must provide personal data

Where we request personal data that is necessary to begin or carry out our work—including **proof of identity and proof of address** and you do not provide it, **we may not begin (or may not be able to continue) our services.**

## Marketing

We do not retain any information for marketing purposes.

## Cookies and website analytics

If we operate a website, it may use cookies and similar technologies, that cover.

- **Essential cookies:** [to provide essential services and functionality, including identity verification, service continuity and site security]
- **Analytics cookies (if used):** [collects anonymous data on how visitors use our site and how it performs and are used to improve the product and services and user experience]
- **Marketing cookies (if used):** [ensure that you do not get repeated advertising messages from the site host]

You can usually control cookies through your browser settings and any cookie controls on our website.

## Changes to this notice

We may update this Data Protection Notice from time to time. The “Last updated” date at the top shows when it was last revised.