

PRIVACY POLICY

Lanka Ventures PLC / LVL Energy Fund PLC

1. Introduction

LANKA VENTURES PLC / LVL Energy Fund PLC (“we”, “us”, “our”) is committed to safeguarding the personal data of our shareholders, investors, partners, and website visitors in accordance with the **Personal Data Protection Act No. 09 of 2022**. This Privacy Policy explains how we collect, use, protect, share, and transfer your personal data when you interact with our website and services.

2. Contact Details

- **Address:** 2nd Floor, "Sayuru Sevana", No. 46/12, Nawam Mawatha, Colombo 02, Sri Lanka
- **Email:** lv@sltnet.lk / contact@lvenergyfund.lk
- **Hotline:** (+94) 11 243 9201

3. Data We Collect

We collect the following information (with your consent or where permitted by law):

- **Identity & Official IDs:** Full name, date of birth, nationality, and National Identity Card (NIC) or passport numbers (primarily for shareholder and investor verification).
- **Contact Details:** Residential address, business address, telephone/mobile numbers, and email addresses.
- **Shareholder & Investment Records:** Shareholding details, transaction history, dividend payment records, and bank account details for dividend distribution.
- **Communication & Technical Data:** Email correspondence, inquiries submitted via our web forms, IP addresses, browser types, and device information collected via website visits.

4. How We Obtain Data

- **Directly from you:** Through investment applications, contact forms on our website, email inquiries, and shareholder communications.
- **From third parties:** Through the Colombo Stock Exchange (CSE), Central Depository Systems (CDS), and share registrars.
- **Public sources:** Legally permitted public registries and regulatory disclosures.

5. Use of Data

We use your personal data to:

- Manage shareholder relations, process dividend payments, and facilitate corporate disclosures.
- Respond to inquiries, investment proposals, and communication sent through our website.
- Comply with legal, statutory, and regulatory obligations (e.g., Securities and Exchange Commission, Colombo Stock Exchange, and tax authorities).
- Maintain website security, optimize digital performance, and analyze visitor demographics to improve our web experience.

6. Legal Basis for Processing

Processing your data is lawful under the following circumstances:

- **Contractual Obligations:** To fulfill our commitments to shareholders, partners, and stakeholders.
- **Legal Obligations:** To comply with Sri Lankan corporate, tax, and securities laws.
- **Legitimate Interests:** To protect our digital infrastructure, prevent fraud, and optimize our business operations.
- **Consent:** Where you have explicitly agreed to receive specific updates or communications from us.

7. Data Sharing

We may share your personal data with:

- **Appointed Registrars & Financial Institutions:** To facilitate share registry management and dividend payments.
- **Regulatory Authorities:** The Securities and Exchange Commission of Sri Lanka (SEC), Colombo Stock Exchange (CSE), and the Department of Inland Revenue, as required by law.
- **Professional Advisors & Service Providers:** Auditors, legal counsel, and IT/web hosting vendors operating under strict confidentiality agreements.

8. International Transfers

If it becomes necessary to transfer data outside Sri Lanka (e.g., cloud storage services or international investor communications), we ensure that adequate data protection safeguards are implemented in compliance with applicable local laws.

9. Data Retention

- Personal data is retained only for as long as necessary to fulfill the purposes for which it was collected, or to meet statutory legal and tax reporting requirements.
- Upon the expiration of retention periods, your data is securely destroyed, deleted, or permanently anonymized.

10. Security Measures

We implement appropriate technical and organizational safeguards—including access controls, firewalls, and secure website hosting protocols to protect your personal data against unauthorized access, loss, or alteration.

11. Cookies & Online Tracking

Our website uses cookies and similar tracking tools to enhance user navigation, analyze web traffic, and secure our online platform. You can manage or disable cookies through your browser settings, though doing so may impact certain website functionalities.

12. Your Rights

Under the Personal Data Protection Act No. 09 of 2022, you have the right to:

- Access, correct, or update your personal data held by us.
- Withdraw your consent or object to specific data processing activities.
- Request the erasure of your personal data (subject to legal or statutory retention mandates).
- Submit complaints regarding data handling to the Data Protection Authority of Sri Lanka.

13. Policy Updates

We reserve the right to revise this Privacy Policy at any time to reflect updates in law or our internal data practices. Any changes will become effective immediately upon being posted to this website.

14. Contact Information

To exercise your rights, clarify shareholding data policies, or submit queries regarding your privacy, please contact:

Data Protection / Investor Relations

Lanka Ventures PLC / LVL Energy Fund PLC

2nd Floor, "Sayuru Sevana", No. 46/12, Nawam Mawatha, Colombo 02, Sri Lanka **Hotline:** [Insert Phone Number]

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