

PRIVACY POLICY

Serendib B.V. | www.myserendib.com

Effective date: 18 March 2026

1. About This Policy

Serendib B.V. (hereinafter "we", "us", "our"), registered in the Netherlands (KVK: 97562645), with registered address at Leiden, The Netherlands, operates the website www.myserendib.com (the "Website"). This Privacy Policy explains how we collect, use, disclose, and protect personal data of visitors and prospective purchasers of condominium unit title rights in the Lake Land project, Sri Lanka.

This Policy is drafted in compliance with: (i) Regulation (EU) 2016/679 (GDPR); (ii) UK GDPR and UK Data Protection Act 2018; (iii) California Consumer Privacy Act (CCPA/CPRA); (iv) Sri Lanka Personal Data Protection Act No. 9 of 2022; and (v) other applicable data protection laws.

2. Data Controller

The data controller is Serendib B.V., Leiden, The Netherlands. Contact: mgnexuscapital@gmail.com.

3. What Personal Data We Collect

3.1 Data You Provide Directly

- Full name and contact details (email, phone number)
- Country of residence and nationality
- Passport or national ID number (for KYC/AML purposes)
- Enquiry or message content submitted via contact forms or email
- Call booking information via scheduling tools (e.g. Calendly)
- Source of funds declarations and supporting financial documents (for purchase transactions)
- Bank account details and SWIFT payment references (for purchase transactions)

3.2 Data Collected Automatically

- IP address and approximate geographic location
- Browser type, device type, and operating system
- Pages visited, time on site, referral source
- Cookie identifiers (see our separate Cookie Policy)

3.3 Data from Third Parties

- Analytics data from service providers (e.g. Google Analytics)
- Information from scheduling platforms when you book a call
- Banking and payment confirmation data from Sri Lankan banking partners

4. Legal Bases for Processing (GDPR / UK GDPR)

- Consent — where you have given explicit consent (e.g. marketing emails, non-essential cookies)
- Legitimate interests — to respond to enquiries, improve the Website, prevent fraud
- Legal obligation — AML/KYC checks and inward remittance documentation required under applicable law
- Pre-contractual steps — processing necessary to respond to your property enquiry and prepare purchase documentation

5. How We Use Your Data

- To respond to enquiries about condominium unit title rights offered by us
- To provide information about the Lake Land project and other projects on the Website
- To schedule and conduct consultation calls
- To perform anti-money laundering and identity verification checks as required by Dutch and Sri Lankan law
- To process and record purchase price payments through our Sri Lanka BFCA bank account, and to maintain the individual payment register (sub-ledger) required for the Deed of Transfer
- To coordinate with Sri Lankan notaries, legal counsel, and the Land Registry for title transfer
- To improve Website functionality and user experience
- To comply with legal and regulatory obligations
- To send marketing communications — only where you have opted in

6. Data Sharing and Disclosure

We do not sell your personal data. We may share data with:

- Professional advisers (lawyers, notaries, accountants) in the Netherlands and Sri Lanka, under strict confidentiality obligations
- Technology and service providers (hosting, analytics, scheduling) acting as data processors under GDPR-compliant agreements
- Our Sri Lanka banking partner (for BFCA account purposes, AML/KYC checks, inward remittance confirmation, and payment records required for the Deed of Transfer)
- Sri Lankan Land Registry and Condominium Management Authority when processing title transfer
- Law enforcement or regulators when required by applicable law

Any transfer of personal data outside the European Economic Area (EEA) — including to Sri Lanka — is conducted under appropriate safeguards. For Sri Lanka, which does not have an EU adequacy decision, we rely on Standard Contractual Clauses (SCCs) or other appropriate transfer mechanisms. By engaging with us for a purchase transaction, you consent to the transfer of necessary data to Sri Lanka for the purposes of title registration and banking compliance.

7. Data Retention

- Enquiry data: up to 3 years from last contact, unless a transaction proceeds
- Transaction and payment data (including SWIFT records, bank credit advices, inward remittance confirmations): 7 years from the date of transaction — required for both Dutch accounting law and Sri Lankan title transfer documentation
- AML/KYC records: minimum 5 years under applicable AML regulations (Dutch Wwft and Sri Lanka Financial Transactions Reporting Act)
- Website analytics: typically 26 months (anonymised after this period)

8. Your Rights

EU / EEA and UK Residents (GDPR / UK GDPR)

- Right of access to your personal data
- Right to rectification of inaccurate data
- Right to erasure ('right to be forgotten') where legally permitted — note that AML/KYC and transaction records cannot be erased during mandatory retention periods
- Right to restriction of processing
- Right to data portability
- Right to object to processing based on legitimate interests
- Right to withdraw consent at any time without affecting prior processing
- Right to lodge a complaint with the Dutch supervisory authority: Autoriteit Persoonsgegevens (autoriteitpersoonsgegevens.nl)

California Residents (CCPA / CPRA)

- Right to know what personal information is collected
- Right to delete personal information (subject to legal retention obligations)
- Right to opt out of sale or sharing of personal information — we do not sell personal data
- Right to non-discrimination for exercising privacy rights

To exercise any of the above rights, please contact us at: mgnexuscapital@gmail.com.

We will respond within 30 days (GDPR) or 45 days (CCPA).

9. Cookies

We use cookies and similar tracking technologies. Please refer to our separate Cookie Policy for full details. In summary: strictly necessary cookies require no consent; analytics and marketing cookies require your explicit consent via our cookie banner.

10. Security

We implement appropriate technical and organisational measures to protect personal data, including encrypted data transmission (TLS/SSL), access controls, and regular security

reviews. Payment references and banking data are stored securely and accessible only to authorised personnel.

11. Children

The Website and our services are not directed at persons under 18 years of age. We do not knowingly collect personal data from children.

12. Changes to This Policy

We reserve the right to update this Privacy Policy at any time. Material changes will be announced on the Website. The date and version number at the top of this Policy indicates when it was last revised.

13. Contact

- Serendib B.V.
- Leiden, The Netherlands
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- Website: www.myserendib.com