Privacy Policy

Last updated: 10 November 2026

This Privacy Policy explains how ICU Group ("ICU Group", "we", "us") handles personal data in connection with this website and correspondence sent to our offices.

Who we are

ICU Group is a private investment group headquartered in Tortola, British Virgin Islands, with offices in Dubai (UAE), Limassol (Cyprus) and Kyiv (Ukraine). This website is operated by ICU Holdings Limited, a company incorporated in the British Virgin Islands (company no. 1612865), whose registered office is at Trident Chambers, P.O. Box 146, Road Town, Tortola VG1110, British Virgin Islands, and which is a controller for the personal data collected through this website. For correspondence sent to our offices, the ICU Group entity you correspond with is responsible for your personal data. We process personal data in accordance with the data protection laws that apply to that entity, including the British Virgin Islands Data Protection Act, 2021, the UAE Federal Decree-Law No. 45 of 2021 on the Protection of Personal Data and, for our Cyprus office, the EU General Data Protection Regulation (GDPR).

ICU Ukraine. Regulated brokerage, asset management and pension services in Ukraine are provided by licensed ICU Group companies in Ukraine (ICU Ukraine), who process the personal data of their clients under their own privacy notice, available at www.icu.ua. This Privacy Policy applies to visits to www.icu.vg and to general business enquiries submitted using the contact details published on that website.

What personal data we collect

This website has no contact forms, user accounts, newsletters or analytics. We collect personal data only in the following situations:

- **When you contact us.** If you email one of our offices, we receive your name, contact details, the content of your message and any attachments.
- **When you visit the website.** To deliver the pages, our hosting provider and font provider automatically process limited technical data, such as your IP address, browser type, device information and the time of your visit.

We may receive your name, business contact details, role and other information relevant to an enquiry from your organization, another participant in a proposed transaction or another ICU Group entity. Providing information in a general enquiry is voluntary. If we need particular information to respond or to proceed with a transaction, we will explain what is required and what happens if it is not provided.

We do not ask for, and ask you not to send us, sensitive personal data (for example, health information or official identification documents) unless we specifically request it as part of a transaction.

How we use personal data

We use personal data to:

- respond to enquiries and evaluate proposals sent to us;
- manage our business relationships and keep appropriate records;
- comply with legal and regulatory obligations, including anti-money laundering and know-your-customer requirements where a transaction proceeds;
- operate, maintain and secure the website.

Where the British Virgin Islands Data Protection Act, 2021 applies, we process personal data on the basis of your consent where we obtain it, or where the Act permits processing without consent as well as on the basis of our legitimate interests in operating our business, to take steps at your request before entering into an agreement, and to comply with legal obligations. This includes processing necessary to perform a contract with you, to take steps at your request before entering into a contract with you, or to comply with a legal obligation that applies to us. We do not sell personal data, use it for marketing profiling or make decisions about you based solely on automated processing.

Who we share personal data with

We share personal data only where necessary, with:

- other ICU Group entities, where needed to handle your enquiry;
- professional advisers, such as legal, tax and audit firms;
- service providers acting on our behalf, such as IT, email and website hosting providers;
- courts, regulators and other authorities where required by law.

Where necessary to handle your enquiry, we may share it with the ICU Group entity responsible for the office, service or transaction to which it relates. We may also share personal data with our hosting, email and IT service providers, professional advisers and competent authorities, as applicable to the purpose described in this notice.

This website loads fonts from Google Fonts, a service of Google. When your browser requests the fonts, Google receives technical data such as your IP address. Google’s processing is governed by Google’s own privacy policy.

International transfers

As an international group, we may transfer personal data between our offices and to service providers in other countries. Where required by law, we put appropriate safeguards in place, such as contractual protections, to ensure your personal data remains protected.

How long we keep personal data

We keep personal data only for as long as necessary for the purposes described above, including any period required by law or regulation. Proposals that we decide not to pursue are deleted within a reasonable period.

Security

We use appropriate technical and organisational measures to protect personal data against unauthorised access, loss or misuse, and limit access to those who need it.

Your rights

Under the British Virgin Islands Data Protection Act, 2021, you may request access to and correction of your personal data. Where we rely on your consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing before withdrawal. You may also lodge a complaint with the Information Commissioner of the Virgin Islands.

Where the GDPR applies, you may also have the right to request erasure, restriction or portability of your personal data, to object to processing, and to lodge a complaint with a competent supervisory authority. To exercise these rights, contact us at privacy@icu.vg. If you are not satisfied with our response, you may lodge a complaint with the data protection authority in the relevant jurisdiction.

Changes to this policy

We may update this policy from time to time. The current version is always available on this website, with the date of the latest update shown above.

Contact

Please, send questions about this policy at privacy@icu.vg