

Office of the Commissioner of Data Protection



Notifications Guidance: Process, Requirements and Step by Step Explanations

Date: November 2022

The future is here.

01

DP Law 2020

DP Law 2020 – Enacted May 2020, Effective July 2020, Enforceable from October 1, 2020

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02

Ethical Data Management

In focus – Articles 6 and 14 requirements and obligations

Articles 6 & 14

DP Law 2020 Part 2 - General Requirements		
Article 6	Requirement	References
(3)(a)	Applies to all DIFC entities (not only financial services)	
(3)(b)	Applies to entities not incorporated in DIFC but that have stable arrangements in the context of its Processing activity in the DIFC (and not in a Third Country), including transfers of Personal Data out of the DIFC.	contracts, business relationships, other arrangements
Article 14	Requirement	References
7 / 8	Notification to Commissioner of Data Protection renewed on annual basis	procedures

Two pronged “test”:

Stable arrangements

Considered by the Court of Justice of the [European Union \(CJEU\) in the Weltimmo case](#), the CJEU ruled that "any real and effective activity – even a minimal one" – through "stable arrangements" in the EEA may be sufficient to qualify as to serve as an establishment (of a relationship, gateway or platform for Processing into the jurisdiction) under (European) data protection law. The threshold for “stable arrangements” can be quite low, and that in some cases a single employee or agent with a sufficient degree of stability of operations would satisfy the test. This is what was in mind when drafting this clause.

Context of Processing Activity

Determine whether the processing activities "are carried out in the context of the activities of an [entity]". Hand in hand with stable arrangements is the concept of the "inextricable link". “Context” can include revenue-raising activities within the DIFC that relate to the processing of Personal Data taking place outside the DIFC, which may indicate that the processing is carried out "in the context of the activities of" the DIFC relationship or platform. Whether such arrangements and context exists is an assessment which organisations need to carry out on a case by case basis. The key is to implement appropriate controls on whatever scale they deem necessary (if any), which is best practice for any business anyway.

Obligations

Article 15	Requirement	References
	<p>Maintain a written record, which may be in electronic form, of Processing activities under its responsibility, which shall contain at least the following information:</p> <ul style="list-style-type: none"> (a) name and contact details of the Controller, its appointed DPO, where applicable, and Joint Controller, if any; (b) the purpose(s) of the Processing; (c) a description of the categories of Data Subjects; (d) a description of the categories of Personal Data; (e) categories of recipients to whom the Personal Data has been or will be disclosed, including recipients in Third Countries and International Organisations; (f) where applicable, the identification of the Third Country or International Organisation that the Personal Data has or will be transferred to and, in the case of transfers under Article 27, the documentation of suitable safeguards; (g) where possible, the time limits for erasure of the different categories of Personal Data; and (h) where possible, a general description of the technical and organisational security measures referred to in Article 14(2). 	<p>procedures ROPA template (spreadsheet or other database)</p>
Article 16	Requirement	References
1	Appoint a DPO if required	<p>internal privacy policy online privacy policy / notification procedures</p>
4	If not required, appoint a person responsible for DP compliance / communications with Commissioner's Office	<p>internal privacy policy procedures</p>
Article 20	DPO / entity to regularly conduct Data protection impact assessment, at least annually	<p>internal privacy policy procedures</p>

Obligations (2)

Article 22	<p>Where the basis for processing under Article 10 changes for any reason, processes are in place for ensuring one of the following actions is taken with respect to the Personal Data:</p> <p>(a) securely and permanently deleted; (b) anonymised so that the data is no longer Personal Data and no Data Subject can be identified from the data including where the data is lost, damaged or accidentally released; (c) pseudonymised; (d) securely encrypted; or</p> <p>Where a Controller is unable to ensure that Personal Data is securely and permanently deleted, anonymised, pseudonymised or securely encrypted, the Personal Data must be archived in a manner that ensures the data is put beyond further use</p> <p>NOTE: A22(4)(c) has certain requirements where AI is used</p>	internal privacy policy procedures
Articles 23, 24, 25	Sign appropriate written data processing agreements between your organization and any 3rd parties	contracts / agreements
	Ensure any privacy policies include a requirement that processing done in your organization is confidentially and only under specific instructions.	internal privacy policy procedures
Article 26	Determine where and Personal Data is transferred for processing outside of the DIFC. If adequate jurisdiction, no further action is required but update notification to Commissioner	internal privacy policy online privacy policy / notification to Commissioner record of processing activities contracts / agreements
Article 27	Determine where and Personal Data is transferred for processing outside of the DIFC. If not an adequate jurisdiction, ensure one of the requirements in Article 27(1)(a to c) is met. Also update notification to Commissioner	internal privacy policy online privacy policy / notification to Commissioner records of processing activities contracts / agreements
Article 29 and 30	Privacy notices (i.e., online privacy policy telling data subjects what you're doing with the PD collected) NOTE: Regarding emerging technology such as blockchain, Article 29(1)(h)(ix) has special requirements	internal privacy policy (article 31 (3)) online privacy policy / notification procedures
Articles 32 to 40	Written policies that provides for data subjects rights contained in relevant articles	internal privacy policy online privacy policy / notification procedures
Articles 41 and 42	<p>Written policy and / or incident management procedure that provides for steps to take when a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise Processed occurs (aka a Personal Data Breach) that accounts for :</p> <ul style="list-style-type: none"> - notification of DP Commissioner - where required, notification of data subject 	internal privacy policy procedures

Accountability

What does Accountability mean?

Please review the [guidance](#) page of the Commissioner's DP website on DIFC.ae for useful resources about the Law and Accountability.

The [Guide to Data Protection Law No 5 of 2020](#) provides extensive information about compliance with the law in general and accountability enhancements.

The ICO in the UK provides excellent [guidance](#) as well, which the DIFC tracks to a large degree.

“Why is accountability important?”

Taking responsibility for what you do with Personal Data, and demonstrating the steps you have taken to protect people's rights not only results in better legal compliance, it also offers you a competitive edge. Accountability is a real opportunity for you to show, and prove, how you respect people's privacy. This can help you to develop and sustain people's trust.

Furthermore, if something does go wrong, then being able to show that you actively considered the risks and put in place measures and safeguards can help you provide mitigation against any potential enforcement action. On the other hand, if you can't show good data protection practices, it may leave you open to fines and reputational damage.”

~ UK Information Commissioner's Office

03

Notifications Process

Why are Notifications required and where does it say so in the DP Law and Regulations?

What is a notification?

A notification is a way of telling the Commissioner and the general public what the entity's processing activities are and how they comply with the [DP Law](#).

NOTIFICATIONS MUST BE UP TO DATE

Why is it necessary to notify when an entity processes Personal Data?

- *It is required for accountability of the entity, to be transparent, and to ensure the entity itself is aware of and tracks its own compliance obligations.*
- *More importantly, it helps the entity build a culture of compliance, privacy and security within the organization.*
- *This isn't just to avoid fines, but to really understand and respect that the Personal Data it processes belongs to individual persons, who are entitled to that right to privacy and to determine how their information and profile is managed.*

What parts of the DP Law and Regulations tell us about notification requirements?

Article 14(7) and (8) of the [DP Law](#) state that notifications are required and must be up to date. Section 3 of the [DP Regulations](#) states the timing requirements and what must be provided.

Steps for Completing the DP Notification

How do I complete a notification in the DIFC Client Portal?

Log into the portal, and if you are **onboarding** as a **new entity**, please complete the DP section as directed.

For an **existing company** updating its notification, please select the DP Notification service request. [Notifications](#) guidance is available as well.

Some things to consider before notifying:

- ✓ **Do I engage in High Risk Processing and if so, who will be my DPO?** Helpful tools are available on the [guidance](#) site for both [HRP](#) and [DPO appointments](#).
- ✓ **Where does the data I collect go?** Think about suppliers or other third parties that might access it (Art. 15), or other parts of your company in another country that you may email or send it to for storage (Art. 27). Please see the [Data Export tool](#) for support.
- ✓ **What would any people whose data I process reasonably expect me to do with their data or why I need it?** It's only fair to be clear about how and why you collect / process data, but you can't email everyone that might think about sharing their data with your business. So you need a [privacy notice / policy](#) (Art. 29/30), privacy clauses in your contracts (Art. 23/24/25/28) (including employment contracts) and a [policy](#) to support individuals exercising their [rights to request access](#) to / updating of their Personal Data (Art. 14, 32 to 40). Tools are available to help you understand the [requirements for responding](#) to access requests.

Process flow – Overview

The Notification process during Onboarding happens in TWO stages

Stage 1: Select the **purpose of the notification**, i.e., to tell the Commissioner that your entity **does / will** or **does not / will not** process Personal Data. To help you understand the concept of processing and the notification requirement, please run this useful, simple [notification assessment tool](#).

At this time, your entity probably doesn't do any processing, but think about whether it will do so in the future, i.e.:

- taking orders from customers for delivery or taking payments
- having employees whose information you must process for visas, payroll and health insurance
- using names and email addresses for marketing purposes or promotions
- using data from website visits (through cookies and IP addresses) to gather analytics and build customer profiles
- supplier information for running your business

If you indicate that you **do not Process** Personal Data, further questions will appear regarding whether you have employees, suppliers or customers, and additional information may be required to justify your selection.

Our team will review your submission and if rejected, you will have to re-complete your initial notification.

Stage 2: From the time your initial onboarding review is accepted, you will have 6 months to complete the rest of the notification. You will be asked to provide additional details about your company's Processing activities.

[Guidance](#) and [FAQs](#) about notifications is available on the [DIFC DP website](#). This notification assessment tool may help you make this decision as well.

If you still have questions about Data Protection obligations and compliance in DIFC, please contact commissioner@dp.difc.ae . If you have questions about the DIFC Client Portal and any technical issues with completing your notification, please contact the Registry Services Help Desk.

All information collected in this form is processed in accordance with the [DIFC Online Data Protection Policy](#).

The process for updating an existing notification essentially follows the same process flow regarding any notification that an entity does not Process PD.

Process flow of Stage 1

PURPOSE OF NOTIFICATION

Corresponds to Article 14(7) and (8) of the DP Law and Section 3.1.1 of the DP Regulations

For the purposes of Articles 14(7) and 14(8) of the Law, a Controller or Processor must notify the Commissioner of the following Personal Data Processing operations.

PLEASE NOTE:

If your entity submits that it does *not* process Personal Data, a reason must be given. An action is created in the Client Portal for the Commissioner's Office to review this type of response.

“DO NOT PROCESS”

Please note that DO NOT PROCESS responses may possibly be rejected on initial assessment by Commissioner's Office, and you may be contacted to discuss your reasons for your selection. If it is rejected, you must indicate that your entity DOES process Personal Data and pay any associated fees for notification.

Only prescribed companies and pure holding companies are currently excluded from this step of the process.

Data Protection details

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Please provide details about your entity's Personal Data processing operations.

It is very important for the Commissioner's Office to know whether your Entity is processing Personal Data or Special Category Data, as defined in the [DP Law 2020](#), Schedule 1, Article 3. Please consider employee, supplier and any other Third Party data that is processed in your organisation as these are all examples of categories of Personal Data.

Please select the notification purpose

i
To inform the Commissioner of Data Protection that you do Process Personal Data ▼

Because you have indicated that your company is or will be processing personal data, you are required to provide a complete "Notification of Processing Personal Data" (the "Notification") service request to inform the DIFC Commissioner of Data Protection ("Commissioner") of your company's processing activities. This Notification must be completed within 6 months of receiving your DIFC License. While you have 6 months, if you begin processing personal data sooner, please submit the Notification service request within 14 days of such processing, as per DIFC Data Protection Law. Please review the Commissioner's guidance on Notifications here .

Data Protection details

Provide us with details of how the Entity will Process Personal Data

It is very important for the Commissioner's Office to know whether your Entity is processing Personal Data or Special Category Data, as defined in the [DP Law 2020](#), Schedule 1, Article 3. Please consider employee, supplier and any other Third Party data that is processed in your organisation as these are all examples of categories of Personal Data.

Please select the notification purpose

i
To Inform the Commissioner of Data Protection that you do not Process Personal Data ▼

Do you anticipate processing personal data in the future

No ▼

Please select reasons for not processing personal data

Available

No Employees
No Consultant / Outsource Provider
Others
None of the Above

Chosen

No Clients / Customers
No Third Party / Supplier / Service Provider

Please provide a justification clarifying the conclusion that your business does not Process Personal Data. Please provide as many details as possible, including whether you had legal support, or guidance, assessment tools, etc., available to support this conclusion.

Process flow of Stage 2 / Updating Notification

Data Protection

Please provide details about your entity's Personal Data processing operations.

Will you be transferring Personal Data outside the jurisdiction of DIFC?

Will you be Processing any Special Categories of Personal Data ?

PURPOSE OF NOTIFICATION

Corresponds to Article 14(7) and (8) of the DP Law and Section 3.1.1 of the DP Regulations

For the purposes of Articles 14(7) and 14(8) of the Law, a Controller or Processor must notify the Commissioner of the following Personal Data Processing operations regarding:

- (a) Personal Data Processing;
- (b) Transfer of Personal Data to a recipient outside of the DIFC which is not subject to laws and Regulations that ensure an adequate level of protection; and
- (c) Special Category Data.

You must also provide detailed information about the reasons for and categories of Personal Data processing

Processing of Personal Data

It is very important for the Commissioner's Office to know whether your Entity is processing Personal Data or Special Category Data, as defined in the DP Law 2020, Schedule 1, Article 3. Please consider employee, supplier and any other Third Party data that is processed in your organisation as these are all examples of categories of Personal Data and will come up later in this form.

Reason for processing personal data

Available

Accounting & Auditing
Administration of Justice
Administration of Membership Records
Advt, Mrkt & PR for Others

Chosen

Please identify whose Personal Data is being Processed

Available

Advisors, Consultants, Prof. Experts
Clients & Customer
Complainants, Correspondents, Enquirers
Members

Chosen

Process flow of Stage 2 / Updating Notification (/2)

From here, the process flow for Stage 2 / Notification Updates follows the flow and sections of [DP Law 2020](#), as set out above

PROCESSING OF PERSONAL DATA

Corresponds to Articles 10, 11 and 13 of the DP Law 2020 and Section 3.1.2 of the DP Regulations

Let's focus on the questions about HRP and Legitimate Interests

Schedule 1, Article 3 definition of High Risk Processing and Article 16 on DPO appointments

If an entity is engaged in HRP, it must appoint a DPO (in the next section), no questions asked. The categories that display after this question are the same as those set out in the DP Law in the definition of HRP at Schedule 1, Article 3. There is [HRP guidance](#) and an easy to use [HRP assessment tool](#), as well, available on the [Guidance](#) page of the [DIFC DP website](#).

Article 13 – Legitimate Interests as a basis for processing

A public authority may not use this as a basis for processing. Otherwise, entities may use this basis for internal admin procedures or only if it is necessary and proportionate to prevent fraud or ensure network and information security.

Does your entity engage in high risk processing (HRP) activities, as defined in Schedule 1, Article 3 of DP Law 2020? An assessment [tool](#) to help you determine whether you engage in HRP is available to assist you. HRP guidance is available on the [DIFC DP Guidance](#) webpage as well.



Do you intend to process Personal Data on any of the legitimate interests bases as specifically set out in Article 13 of the DP Law 2020?

Process flow of Stage 2 / Updating Notification (/3)

ACCOUNTABILITY AND OBLIGATIONS

Corresponds to Articles 14(1) to (5), 15, 16 to 18 and 23 to 25 of the DP Law and Section 4 of the DP Regulations. [Accountability guidance](#) is available on the [Guidance](#) page of the [DIFC DP website](#).

Article 14(1) requires that a Controller or Processor has a compliance program in place. Articles 14(2) to (5) discuss elements of that program, but we do not ask them to confirm these elements in the notification.

Article 15 requires the Controller or Processor to keep a record of processing activities (ROPA), and includes the items in Article 15(1)(a to h). A good example is to start with the entity's accounts payable report, and narrow it down by retaining only the suppliers / third parties they provide Personal Data to for processing (i.e., payroll, health insurance, IT companies, etc)

Article 16 to 18 discusses the Data Protection Officer (DPO) appointment and DPO responsibilities. Two types of entities **MUST** appoint a DPO

- (a) a Centre Body (DIFCA, DFSA, etc.)
- (b) An entity engaged in HRP – run through the [HRP assessment tool](#) to help determine whether you engage in HRP. If YES, you **MUST** appoint a DPO

Whether appointing a DPO or not, **DP contact details must be provided.**

Articles 23 to 25 cover requirements for contracts between 2 controllers, controllers and processors, and between processors and sub-processors. Processors in particular must have contracts in place with the appropriate items set out in Article 24(5)(a) and (b).

Accountability

Articles 14 to 24 of the DP Law 2020 set out requirements and practices that assure data protection compliance within the organisation. For new entities or those that have only recently started processing Personal Data, it is possible that such components are not yet in place. If you answer NO and the question WHY NOT? appears, please provide a sensible response such as "It is in development" or "We didn't know about this requirement". For additional support please see the [Accountability and Rights](#) page of the DIFC DP website.

In accordance with Article 14(1), have you established a compliance program that addresses all elements of Article 14(2) to (5) as well as any other compliance requirements in the DP Law 2020? For support please refer to the compliance checklist and DPIA template available on the [Accountability and Rights](#) section of the DIFC DP website.

Have you (Controller or Processor) created and maintained a record in electronic form of Processing activities as per Article 15(1) and 15(2)? If you need a template to create a record of processing activities (ROPA), you may wish to use the sample ROPA available on the [Accountability and Rights](#) menu of the DIFC DP website.

Have you (Controller or Processor) appointed a Data Protection Officer (DPO) as per Articles 16, 17 and 18? If you are not sure whether you should appoint a DPO, please review the guidance on the DIFC DP Page or use this [DPO appointment assessment tool](#). If you engage in HRP, you **MUST** appoint a DPO.

Do you (Controller or Processor) have in place a means of setting out in writing contractual obligations between your entity and a Joint Controller or with a Processor, in accordance with Articles 23 and 24, respectively, as well as Article 25 of the DP Law 2020?

Process flow of Stage 2 / Updating Notification (/4)

TRANSFERS OF PERSONAL DATA

Corresponds to Articles 26 and 27 of the DP Law and Section 5 of the DP Regulations.

Why are transfers to other jurisdictions such a hot topic?

Where there is no data protection law, or even where this is one and it does not meet the standards of the place the data is collected or leaves from, there is no assurance at least in law that the data will be managed in the same way as it is at home. Articles 26 and 27 of the DIFC DP Law 2020 cover these issues.

If a country does not appear in one of the lists, it is 99.999% sure to be in the other list and the reason for that is because some are adequate and some are not. Please double check both lists if it appears that a country is not there, because it will certainly be in one of the lists.

Data Export guidance and a helpful assessment tool are available to help understand the requirements. Also, the standard data protection clauses for Article 27 compliance are available on the Data Export and Sharing page. This guidance and the list of adequate countries will help complete the questions.

For information about how Schrems I and II impact transfers from the DIFC, please check the relevant notes (which are updated from time to time) on the Data Export and Sharing page.

NOTE: Privacy Shield is now invalid, as is Safe Harbor. These will not be available as options in either transfers list.

Transfer of Personal Data

Please provide information about transfers of Personal Data to any jurisdictions outside the DIFC. Those with a similar [DP Law 2020](#) or regime are considered "adequate" and those without such a regime are not, as they present certain risks regarding available processing controls, if any. A list of adequate jurisdictions that correspond to the list provided here is available on the [Data Export and Sharing page](#) of the DIFC DP website. Please complete this data export [assessment](#) to help understand your obligations regarding international data transfers.

Will you be transferring personal data outside the jurisdiction in accordance with Article 26 of the DP Law 2020 ?

--None--

Will you be transferring Personal Data outside the jurisdiction of the DIFC in accordance with Article 27 of the [DP Law 2020](#)?

--None--

Process flow of Stage 2 / Updating Notification (/5)

DATA SUBJECTS' RIGHTS

Corresponds to Articles 22 and 29 to 40 of the DP Law, and Section 6 of the DP Regulations.

Data subjects' Rights (DSR) section is, after Accountability, possibly the most important part of the DIFC DP Law. In the end, Personal Data belongs to the people that make your business successful. These people are called Data Subjects, as defined in Schedule 1, Article 3.

Controllers must provide 2 ways of getting in touch in accordance with Article 40 of the DP Law, so anyone can ask questions about what is being done with their Personal Data, how to rectify it, remove it, object to processing it and withdraw their consent for its use.

Entities must also have policies in place regarding these issues. Please note, DIFC staff cannot review the policies or to confirm they are implemented correctly. It is therefore not appropriate for the Commissioner's Office or Registry Services to address such questions, apart from recommendations made as a result of formal inspections.

We can however take complaints where a data subject thinks that a Controller or Processor has contravened the DP Law and Regulations, and we can guide Controllers about what they should do to fulfill a DSR requests.

[DSR guidance](#) is available on the [Guidance](#) page of the [DIFC DP website](#).

Data Subjects' Rights

Protecting and respecting Data Subjects' Rights are a fundamental part of any data protection law. Privacy notices, policies for responses to individuals' requests to exercise their rights under Articles 32 to 40, and methods for doing so must all be part of your compliance program. Please provide the requested information below.

Have you provided for a minimum of two methods by which the Data Subject can contact the Controller in accordance with Article 40 of the DP Law 2020 ?	Do you have appropriate policies and processes in place that will support a Data Subject's exercise of his or her rights under Parts 5 or 6 of the DP Law 2020 ?
<input type="text" value="--None--"/>	<input type="text" value="--None--"/>

Process flow of Stage 2 / Updating Notification (/6)

BREACH REPORTING MEASURES

Corresponds to Articles 41 and 42 of the DP Law. [Personal Data Breach Reporting guidance](#) is available on the [Guidance](#) page of the [DIFC DP website](#).

Article 41 requires that a Personal Data Breach is reported to the Commissioner of Data Protection. The law requires that DIFC entities have a policy in place and processes to ensure that these are reported and done so in a timely manner.

Article 42 requires that a Personal Data Breach is also reported to the Data Subject in certain circumstances only. The same requirements apply regarding policies and procedures.

Breach Reporting Measures

Breach reporting is necessary when something happens to compromise a Data Subject's confidentiality, security or privacy with respect to the information the entity processes about them. Notification to the Commissioner's Office is required, and in some cases, the Data Subject may also be necessary. Appropriate measures for handling and notifying such breaches should account for the details set out in Articles 41 and 42 of the DP Law 2020. Please review the [Security and Breach Reporting](#) information and guidance available on the DIFC DP website.

Do you have appropriate measures, including where necessary any policies and processes, in place to comply with both Articles 41 and 42 of the [DP Law 2020](#) regarding Personal Data Breaches?

--None--

04

Helpful Information

Guidance and Information

[DIFC DP Website](#)

The Commissioner's Office has [posted guidance](#) and assessment tools on several key topic areas of the DIFC DP Law 2020

GUIDANCE

Guidance and Handbooks

General Requirements

Lawful Processing

Accountability & Notifications

Data Protection Officers

Risk Assessments (DPIAs, DPO
Assessment, Prior
Consultation, Cessation)

Obligations of Controllers and
Processors

Data Export and Sharing

Information Provision and
Rights of Individuals

Personal Data Breaches

Remedies, Liability and
Sanctions

External Guidance, Policies &
Other Presentations

Data Protection Tuesday Talks

Comprehensive Data Protection Guidance & Assessment Tools

Guidance and Handbooks

Please note that under certain headings, some guidance documents or handbooks may be repeated as they cover elements of several important data protection concepts.

Also, please note that the Commissioner's guidance and handbooks are not meant to express an opinion on lawfulness of specific business activities, nor do they have the force of law, and are not intended to constitute legal advice. Please contact legal counsel for assistance in determining data protection and privacy policies in respect of the topics addressed below, to ensure compliance with the applicable laws and regulations. The Commissioner does not make any warranty or assume any legal liability for the accuracy or completeness of the information herein as it may apply to the particular circumstances of an individual or a firm.

Is consent required for the processing of data under the DP Law 2020?

There is extensive [guidance on consent](#) on the DIFC DP Guidance page – short answer is no, not always, but in certain cases, notification is at least required.

What about direct marketing? Is that allowed?

It is but it must be communicated that it will take place using any PD that is collected in simple terms. Please see the [direct marketing guidance](#) available on the DIFC DP Guidance page.

General Resources

[DIFC DP Website](#)

DIFC [DP Law 2020](#)

DIFC DP [Regulations](#)

DIFC DP [Guidance](#)

DIFC DP [FAQs](#)

Clyde & Co [article](#) comparing GDPR with DIFC Law

PWC [DP Maturity](#) Tool

[Compliance checklist and DPIA template](#)

Tru
Trust
Share

Contact

For further information
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