

Privacy Policy

April — operated by Muskays Ltd. · Company No. C 110169 · Malta

Last updated: 20 April 2026

1. Who We Are

Muskays Ltd. ("Muskays", "we", "us", "our") is a company registered in Malta under company number C 110169, with registered office at INTERNATIONAL HOUSE, Triq I-Imdina, BKR 3000 Birkirkara, Malta.

Muskays is the data controller responsible for the personal data processed through the April affiliate marketing platform (aprilftd.com).

Contact for privacy matters: admin@muskays.com

2. Scope of this Policy

This Privacy Policy describes how we collect, use, store, and protect personal data in compliance with the EU General Data Protection Regulation (GDPR 2016/679) and the Maltese Data Protection Act.

3. What Personal Data We Collect

Depending on your interaction with us, we may collect the following categories of personal data:

- **Identification data:** name, company name, registration number, address, email, phone number.
- **Financial data:** bank account details, invoicing information, VAT numbers.
- **Account data:** login credentials, user preferences, IP addresses.
- **Transactional data:** campaign performance, conversions, payment history.
- **Technical data:** device information, browser type, cookies (see our Cookie Policy).
- **Correspondence data:** communications exchanged with us.

4. Why We Collect Personal Data

We process personal data for the following purposes and legal bases:

- **Contract performance:** to onboard Users, manage accounts, process payments, and deliver Platform services.
- **Legal obligations:** to comply with anti-money laundering, tax, and regulatory obligations applicable in Malta and the EU.
- **Legitimate interests:** to secure the Platform, prevent fraud, conduct internal analytics, and improve our services.
- **Consent:** for marketing communications or optional cookies (where applicable).

5. How We Share Personal Data

We may share personal data with:

- **Service providers:** hosting providers, payment processors, accounting firms, and compliance service providers acting on our instructions.
- **Advertisers and sub-affiliates:** only to the extent necessary to execute the commercial relationship.
- **Regulatory authorities:** where required by law (e.g., Financial Intelligence Analysis Unit (FIAU) of Malta, tax authorities).
- **Professional advisors:** lawyers, auditors, bankers bound by confidentiality obligations.

We do not sell personal data to third parties.

6. International Transfers

Where personal data is transferred outside the European Economic Area (EEA), we ensure appropriate safeguards are in place, including Standard Contractual Clauses approved by the European Commission.

7. Data Retention

We retain personal data only as long as necessary for the purposes described above, or as required by applicable law. In particular, accounting and AML records are retained for a minimum of five (5) years from the end of the business relationship, as required by Maltese law.

8. Your Rights

Under GDPR, you have the following rights regarding your personal data:

- Right of access.
- Right to rectification.
- Right to erasure ("right to be forgotten"), subject to legal retention obligations.
- Right to restriction of processing.
- Right to data portability.
- Right to object.
- Right to withdraw consent at any time (where processing is based on consent).
- Right to lodge a complaint with a supervisory authority (in Malta: Office of the Information and Data Protection Commissioner).

To exercise any of these rights, contact us at admin@muskays.com.

9. Security

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, loss, alteration, or disclosure, including encrypted data transmission, access control, and regular security reviews.

10. Changes to this Privacy Policy

We may update this Privacy Policy from time to time. The latest version will always be available on the Platform with the date of last update.