

PRIVACY POLICY

This Privacy Policy (hereinafter – “**Policy**”) concerns natural persons who are existing/potential clients of Service provider OR act as authorized representatives of legal entities which are existing/potential clients/counterparties OR are the Directors/Shareholders/Beneficial owners of legal entities which are existing/potential clients/counterparties, hereinafter referred to as “You/Your”.

This Policy describes the purpose of your data collection and processing by the Service provider. Please pay Your proper attention to the follows:

- 1) this Policy to better understand our viewpoints and the implemented practices. The data provided by you are confidential and are subject to disclosure on conditions stated in this Policy and/or stipulated by the relevant law.
- 2) carrying out conclusive activities including but not limited by downloading the Service provider website on your computer, mobile device, or using an mobile application, filling out web-forms, communicating in written, mail and/or verbally with the Service provider or relevant representators, as well as by transferring your personal data and/or providing in any other way the information which contain your personal data to Service provider, You without any doubt agree to the conditions described in the Policy.
- 3) the persons who want to perform actions related to the entry of interaction with the Service provider, but who do not agree with the content of this Policy in full or in any part, and/or who do not understand any of the provisions of this Policy, should not take any action to disclose and/or transfer the personal data. Any communication and/or provision the personal data to the Service provider and/or its representations are a proven confirmation of Your consent with the Data Privacy Policy.

1. DEFINITIONS

“**Controller**” – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data.

“**Personal Data**” – means any information relating to an identified or identifiable natural person (name, ID, location and any other factors specific to the physical, genetic, mental, economic, cultural or social identity of that natural person); The information for the legal entities such as businesses, partnerships, trusts or other organizations provided by its authorized person, signatory, partner, trustee, executor or a like shall be considered as appropriate.

“**Processor**” – means a natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the controller;

“**Processing**” – means obtaining, recording, storing, holding, using or carrying out any operation or set of operations on the information or data including organization, adaptation or consultation on the information or data, as well as disclosure by transmission, dissemination or otherwise making available, or alimenting, combining, blocking, removing or destructing of the information or data;

“**Sub-Processor**” - any processor engaged by the data importer or by any other sub-processor of the data importer and who agrees to receive from the data importer or from any other sub-processor of the data importer personal data exclusively intended for the processing activities to be carried out on behalf of the data exporter after the transfer in accordance with the data exporter’s instructions.

2. GENERAL PROVISIONS

The Policy determines the procedure and conditions for lawful basis of Personal Data processing by the Service provider, the list of personal data which may be processed, categories of recipients of your personal data, your right and obligations as well as another important information which is relevant to the processing of Your personal data. This Policy shall be construed and interpreted in accordance with the GDPR and applicable law. You and the Service provider hereto irrevocably submit to the

exclusive jurisdiction of the courts of the Service provider jurisdiction in connection to any dispute arising from the terms of this Policy.

3. LAWFUL BASIS OF PROCESSING

According to the applicable law, the Service provider acts as a Controller of Your Personal Data and determines solely or jointly with others, the main purpose and legal grounds for the collection and processing of Your Personal Data.

The Service provider has outlined the following purposes and legal grounds:

- **Consent.** Starting interaction and/or preliminary contract relationships with the Service provider as well as providing Your personal data to obtain the possibility of concluding an agreement, as well as conducting an on-boarding procedure, KYC, KYT, employment procedure, You provide a consent to the Service provider to processing your Personal Data according to hereof.
- **Performance of the contract.** The collection and processing of Your Personal Data is necessary for entering into business relationship with You for the provision of services.
- **Compliance with legal framework** within which the Service provider operates. Compliance with these regulations requires from the Service provider to identify and verify personal information related to You and all connected persons, as well as exercise anti-money laundering controls, keeping and collecting Personal Data for the particular period of time and disclose such information to the supervisory and other regulatory authorities, etc.
- **Legitimate interests** pursued by the Service provider in order to protect its business environment, provided that such interests do not infringe the rights, interests and Your fundamental freedoms. "Legitimate interests" is a heading that covers several different reasons why The Service provider may need to collect and process Your Personal Data which may not be covered by other headings, such as: to prevent fraud or financial crime, to provide a better service, to transfer Personal Data between group entities for internal administrative purposes, or for the purposes of network or information security.

4. WHAT INFORMATION WE COLLECT FROM YOU

The Service provider is required to collect the following Personal Data:

- Personal information (name, address, email, telephone number, mobile number, temporary residential address, employment address, name of employer, personal status, i.e. identity card number, passport number, marital status, occupation, country of taxation and other);
- Financial information (income, source and size of wealth and other);
- Recording of the call conversations between You and the Service provider;
- Your photos, pictures and/or images which were provided by You directly and/or indirectly in written and/or digital and/or during visit the Service provider's office via a CCTV.

The Service provider is also required to collect and keep all the documents which confirm the accuracy of provided personal and financial information (passport, ID, Utility Bills, Bank Statements, Internal passports, Bank References, CVs or any other information which may be requested by the Service provider in order to comply with the applicable law).

The Service provider always makes sure that all Personal Data we collect is adequate, relevant and limited to what is necessary in relation to the purposes for which they are collected and processed.

In cases where we receive data which was not requested or where information was unintentionally revealed, and the Service provider does not intend to use it for the purposes of processing or where data was received by mistake, The Service provider shall notify You that such data was received and destroy it, unless You wish otherwise.

For the Service provider services and communication with You, we do not require the sharing of special category data or sensitive personal data (such as health data, political beliefs, etc.).

5. CATEGORIES OF RECIPIENTS OF YOUR PERSONAL DATA

Your Personal Data in the course of performing our contractual and statutory obligations may be disclosed to the following Processors, Sub-Processors and Controllers:

- Supervisory and other regulatory and public authorities, including government bodies;
- External auditors, lawyers, agents, consultants and other professional advisors subject to confidentiality agreements;
- Banks and other financial organizations subject to the confidentiality agreements;
- Employees of the Service provider;
- Subsidiaries and Affiliated companies.

The Service provider may be required to transfer the information provided by You outside of the European Economic Area for the purposes of executing the services provided in a manner as described under the Service provider's Internal Policies.

The Service provider ensures an adequate level of protection for any Personal Data processed by others on behalf of the Service provider that it is transferred within or outside the European Economic Area.

Unless expressly declared by You, the Personal Data collected and kept by the Service provider will not be disclosed to any third party other than the above-mentioned recipients.

6. PERSONAL DATA RETENTION TIME

In accordance with the laws and regulations The Service provider is obliged to keep and update Your Personal Data for as long as the Service provider provides its services to You. Upon the termination of the business relationship, Your Personal Data shall be kept for a minimum of five [5] years. After the legally required period lapses, Your Personal Data shall be destroyed.

However, the Service provider will be required to keep Your Personal Data for the longer period of time if it is prescribed by laws, competent authorities or other regulations (such as pending legal proceedings or investigations).

7. RIGHTS AND OBLIGATIONS

You have the following rights in relation to the Personal Data provided by You to the Service provider:

- The right of access to or have a copy of Personal Data as well as some supplementary information on that data;
- The right to request rectification of incorrect data concerning You;
- The right for data portability if it should become relevant;
- The right to request, on legitimate grounds the erasure of Your Personal Data;
- The right to object the processing of Personal Data based on the Service provider legitimate interests and/or processing of Personal Data for direct marketing purposes;
- The right to restrict processing of Your Personal Data;
- The right to withdraw consent, by written notice, if the process of Your data is based on consent. Please note that this will not affect the lawfulness of processing based on consent before it was withdrawn by You;

The above rights can be exercised by sending the relevant email.

Furthermore, You have a right to lodge a complaint regarding the processing of Your Personal Data by the Service provider by sending a complaint to Service provider and the Service provider's responsible officer will investigate the matter. In case You are not satisfied with the Service provider's response or if You feel that Your concerns have not adequately addressed by the Service provider, You have the right to file a complaint with the Office of the Commissioner for Personal Data Protection.

8. SAFEGUARDING

The Service provider, the processors on its behalf and its affiliates / fulfilment assistants undertake to apply appropriate technical and organizational measures to, as far as possible, better protect your personal data against accidental or unlawful deletion or loss, alteration, illegal disclosure or access to

them and generally their illegal processing (including remote access) as well as to ensure the possibility of restoring availability and access to them.

These measures aim to ensure a level of security that corresponds to the risk that your specific data may undergo, always taking into account the type and criticality of this data, the technical capabilities of Service provider, the development of technology, the cost of implementation and the nature, scope, context and purposes of any particular processing, while implementing procedures to regularly test, assess and evaluate the effectiveness of these technical and organizational measures.

9. PERSONAL DATA BREACH NOTIFICATION

In case the Service provider becomes aware of a Personal Data breach which may result in high risk to Your rights and freedoms, the Service provider shall without undue delay notify You of such breach and provide the following information:

- Type of Personal Data affected;
- The nature of breach;
- Steps the Service provider shall take in order to minimize any damage.

You should inform the Service provider immediately by sending an email of any possible damage, loss or misuse such breach may cause to You in order to assist the Service provider assess all possible solutions promptly.

10. MISCELLANEOUS

This Policy is valid for an indefinite period. The Service provider reserves the right to make changes to this Policy by posting a new version of the Policy on the website of the Service provider. In this case, such changes come into force from the date of posting the relevant information on the site. Before entering into a business relationship with the Service provider, You undertake to contact the site for information about changes and additions to this Policy, as well as other relevant Terms and Conditions. If one or more of the provisions of the Policy are or become invalid due to amendments to the current legislation, then this is not a basis for suspending the validity of the remaining provisions of the Policy. Invalid provisions must be replaced by legally permissible provisions that are close in meaning to the replaced ones.