

ELIDI Securities Ltd (ex UGM Securities Ltd)**Data Protection and Privacy Policy****February 2024**

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1. INTRODUCTION

ELIDI Securities Ltd (the “Company”) is committed to protecting customers’ privacy. Pursuant to the Data Protection Legislation as well as other related laws and regulations on the establishment and services provided by the Company, the latter is required to establish, implement and maintain an effective Data Protection and Privacy Policy set out in writing. This Policy outlines the Company’s responsibility to manage and ensure the protection of privacy of customer’s personal and financial information and to behave in a fair and moral manner concerning the gathering, processing, storing and handling of such personal data.

The Customers’ personal data and preservation of their privacy, is considered and treated by the Company with the utmost importance and highest priority and this Policy applies to former, existing and potential Investors.

2. LEGAL FRAMEWORK

For the purposes of, inter alia, this Data Protection and Privacy Policy, the Company is operating under:

- The Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (‘GDPR’) as implemented by the Cyprus Law 125(I)/2018 (hereinafter “Data Protection Legislation”).
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in financial instruments (“Market in Financial Instruments Directive” or “MiFID II”) which was implemented in Cyprus by the Investment Services and Activities and Regulated Markets Law of 2017 (Law 87(I)/2017).
- Directive (EU) 2015/849 (4th EU AMLD) which is the main legislative instrument for the prevention of the use of the Union Financial System for the purposes of money laundering and terrorist financing as well as Directive (EU) 2018/84 (5th EU AMLD) addressing emerging risks and increasing transparency of beneficial ownership and finally Regulation (EU) 2024/1640 of 31 May 2024 on the prevention of use of the financial system for the purposes of money laundering or terrorist financing to apply from 10 July 2027. Cyprus legislation on “The Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007” L188(I)/2007 as amended by Laws 58(I)/2010, 80(I)/2012, 192(I)/2012, 101(I)/2013, 184(I)/2014, 18(I)/2016, 13(I)/2018, 158(I)/2018, 81(I)/2019, 13(I)/2021, 22(I)/2021, 40(I)/2022, 98(I)/2023.
- The implementation of the Provisions of the Resolutions or Decisions of the United Nations Security Council (Sanctions) and the Decisions and Regulations of the Council of the European Union (Restrictive Measures) Law of 2016 -Law 58(I)/2016. The Combating of Terrorist Law of 2019 (Law 75(I)/2019).

3. CUSTOMER PERSONAL DATA

The Company collects Customer Personal Data, as it is required by law to do so, for various reasons, which include:

- a) The provision of investment and ancillary services,
- b) To ensure compliance with the provisions of the Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007-2021,
- c) To communicate with customers,
- d) For marketing purposes,
- e) To defend its legal rights,

- f) For recruitment, employment and payroll, and
- g) For any other purpose similar to or connected to the above or for any other purpose that the customer will provide Personal Data to us.

Customer Personal Data, include, but are not limited to, the following: name, address, identification details, postal and business address, mobile phone number, email, profession, bank account details, social insurance number, tax identification number, certificate of clean-criminal record, certificate of non-bankruptcy and other relevant details of each Customer. The Company may also, acting within its legal obligations, collect Customer Personal Data from sources including, for example, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers and such other services that may from time to time be required for the Company's legitimate purposes.

This Customer Personal data is stored and processed by the Company throughout the validity period of the contract / relationship, in order to provide the requested services, handle requests and/or enquiries and perform payments. This data is also stored for a period of five years after the termination of the contract / relationship, as required to by law.

4. PROCESSING ACTIVITY

The Company wants to assure its customers that it will collect, process, maintain, store, use and handle Customers' Personal Data in accordance with the Processing of Personal Data Laws and General Data Protection Regulation as amended from time to time, this Privacy Policy and the Company's Trading Terms and Conditions.

The Company may process the Personal Data set out above for any of the following purposes:

- a) Disclose Personal Data to the Cyprus Securities and Exchange Commission and/or the Central Bank of Cyprus, as per the relevant legal requirements,
- b) Disclose information that is essential to auditors, legal consultants, operational partners, support services partners and affiliates for the complete provision of the service to the customer,
- c) Provide information to the customer's authorized representative,
- d) For compliance with a legal obligation of the Company,
- e) For the protection of the customer's vital interests,
- f) For purposes of legitimate interests of the Company, such as legal actions against the customer, the detection and prevention of fraud and IT purposes (e.g., cyber-security, data loss prevention),
- g) Reveal to regulatory authorities, competent governmental authorities and agencies (other than tax authorities), law enforcement agencies, intergovernmental or supranational bodies, and other third parties with the requisite authority to request such information,
- h) Reveal information in response to criminal or civil legal process as requested by the competent courts of the relevant jurisdiction and as permitted under Cyprus Laws,
- i) Provide information for statistical purposes that do not include personal identification information but are of rather aggregate nature.

The Company takes all necessary steps to safeguard the Confidentiality, Integrity and Availability of its systems and services, e.g., to protect against cybersecurity threats, fraud, etc. Personal data is stored by the Company for a period of five years (may also be extended to 7 years if requested by the competent authority or MOKAS) after the termination of the contract / relationship. After the lapse of this period this data is erased.

In light of the above, and in order to be able to proceed with the provision of our services to you, we kindly request that you review, complete and sign ANNEX I "Consent for the processing of personal data and communication".

5. GENERAL CUSTOMERS' RIGHTS

a. Right of access

Customers have the right to access their personal data and supplementary information. The right of access allows Customers to be aware of and verify the lawfulness of the processing of such personal data.

Customers may be informed in more detail about the Personal Data processes of the Company by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

b. Right to rectification

The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. The customer can make a request for rectification verbally or in writing to the Company.

Customers may be provided supplementary forms to fill, in order to facilitate such a request by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

c. Right to erasure (“right to be forgotten”)

The GDPR introduces a right for individuals to have personal data erased also known as ‘the right to be forgotten’. The right is not absolute and only applies in certain circumstances/lawful bases. In accordance with the Company’s regulatory obligations and as required by Law, Customers Personal Data will be kept and retained on record for a minimum period of five (5) years.

A determination to erase data will be based on the following criteria:

- The data is no longer necessary for the purpose it was collected.
- The data subject withdraws consent.
- There are no legitimate grounds to process the data.
- There is no legal obligation to continue to store the data.
- The data has been unlawfully processed; and
- To comply with GDPR or other legislation.

The Compliance Officer of the Company will examine the lawful bases of data processing, and he will decide whether such request can be granted or not. This decision will be duly disclosed to the data subject.

Customers may request the erasure of any of their Personal Data by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

d. Right to restrict processing

Individuals have the right to request the restriction or suppression of the processing of their personal data, however this is not an absolute right and only applies in certain circumstances/lawful bases. Once again, the person responsible will examine the request.

Customers may be provided supplementary forms to fill, in order to facilitate such a request by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

e. Data portability

The right to data portability/ data transfer allows the Customer to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

Customers may exercise the right to data portability by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

f. Rights related to automated decision-making including profiling

The GDPR applies to all automated individual decision-making and profiling. Article 22 of the GDPR has additional rules to protect individuals if the Company is carrying out solely automated decision-making that has legal or similarly significant effects on them.

The Company can only carry out this type of decision-making where the decision is:

- necessary for the entry into or performance of a contract; or
- authorised by Union or Member state law applicable to the controller; or
- based on the individual's explicit consent.

Customers may exercise the right related to automated decision-making including profiling by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

g. Right to withdraw consent

Under Article 7(3) of the GDPR, the data subject has the right to withdraw his/her consent for processing their personal data at any time. However, the right to revoke consent for data processing is only applicable when the processing of the data was based solely on consent and no other legal

requirement exists for keeping such data for longer periods of time. Thus, not all types of data can be deleted or amended per request of the data subject

Elidi Securities Ltd is a highly regulated Company and carries a legal obligation to maintain most of its data, including those of its clients, for a period of 5 to 7 years after the termination of the contractual relationship between the data processor and the data subject on the requirements of the following legislation:

- The Anti-money laundering Directive DI144-2007-08 of 2012 or any subsequent amendment or change of this legislation.
- The Investment Service Law 87(I)/2017, or any subsequent amendment or change of this legislation.
- Inland Revenue Department legislation.
- Any legislation issued by the Unit for Combating Money Laundering (MOKAS), The Cyprus Securities and Exchange Commission, the Office of the Commission of Data protection in Cyprus or any other legislative or supervisory authority, which may be empowered by Law to supervise us.

In case the data subject wishes to withdraw their consent given for data processing, he/she can do so by:

- a) Visiting the offices of the Company, completing, and submitting the relevant application form, or
- b) Requesting via email at info@elidi.cy the relevant application form and submitting the said via the same email address.

5. Information security measures

The Company maintains solid information security measures and procedures to safeguard Customers' Personal Data, in line with our legal obligations.

A comprehensive approach is considered for information security to effectively ensure the Confidentiality, Integrity and Availability of customers' Personal Data. The Company endeavors to implement a holistic Information Security Management System to effectively safeguard the Confidentiality, Integrity and Availability of our Customers data.

6. Transfers outside the EU/EEA

Customers are informed that the associates of the Company are based both within the EU and/or the EEA but also outside the EU and/or the EEA. Partners within the EU/EAA are contractually committed to the Company to provide appropriate security safeguards and to maintain the confidentiality of the customers' Personal Data, as they are also bound by the GDPR. With regards to Personal Data shared outside the EU/EEA and subsequently accessed by other entities, these shall only be shared when there are guarantees of an adequate level of protection in terms of applicable law and remain limited to the minimum necessary for the intended purposes, on the condition that all relevant data protection agreements ("DPA") are in place and duly signed by the parties.

7. Contact information and complaints

Customers can contact the Company for any information on its Privacy Policy by phone at +357 95 544 202, or by post at, 62 Agiou Athanasίου Ave. Office/Flat 303 Agios Athanasios, 4102 Limassol Cyprus or by email at info@elidi.cy. The same contact details may be used for any inquiry or complaint.

8. ANNEX I

CONSENT FOR THE PROCESSING OF PERSONAL DATA AND COMMUNICATION

I/ Wephysical person

With permanent address:

And ID or Passport Number:

Give my/ our consent so that Elidi Securities Ltd will be able to:

☐ Process my/our personal data in accordance with the provisions of the General Regulation for the Protection of Personal Data (GDPR) of the EU.

To communicate with me/us using the following method of communication:

☐ (a) Via telephone at the following number:

☐ (b) Via E-mail:

☐ (c) Via

.....

Client Signature

.....

Date