



Privacy Statement

Finserve Consultants Ltd.

1. WHO WE ARE

FinServe Consultants Limited is a leading financial services and regulatory consulting firm which was established with the aim to offer to its valuable clients the very best professional services. Our expert professionals provide unique and tailored made solutions among others in the areas of licensing, activation of licenses, regulatory compliance, risk management, human resources, cybersecurity, corporate governance, executive training and many more.

If you have any questions, or want more details about how we use your personal information, you can contact us at: Christophides House, Units No.101, 28 Ayias Zonis, 3027 Limassol, Cyprus, email: info@finserveconsultants.com

2. INTRODUCTION

Our Privacy Statement

- i. describes the types of Personal Data FinServe Consultants Ltd. (hereinafter FinServe or we) collects, how we store and process clients 'personal data, how we use it, and with whom we share it and
- ii. (ii)provides the information about rights in accordance with local law and the EU General Data Protection Regulation (EU) 2016/679. We also describe the measures we take to protect the information and how you can contact us about privacy practices.

By using FinServe's services, you acknowledge you have read and accept Our Privacy Statement.

We may also sometimes collectively refer to handling, collecting, protecting and storing your personal data or any such action as "processing" such personal data.

3. WHAT DATA WE COLLECT

For the purposes of this statement, personal data shall mean any information relating to you which includes the information that identifies you as an individual or relates to an identifiable person:

- a. **Personal data you submit** - We collect Personal Data when you submit it to us, such as when you register for or subscribe to certain products or services; create a profile or contact customer service. We collect and process different types of personal data which we receive from you in person or via your representative or in another context of our business relationship. When you fill out our website's newsletter form, you indicate your consent to receive our newsletter. You can at any time unsubscribe from receiving this newsletter by following the instructions provided in any of the newsletters. When you browse our website, we process your IP address, Google Analytics ID, internet browser and device type, location data and your use of our website, including which pages you visited, how you got to our

website, the time and length of your visit and your language preferences. We use this data for our legitimate interests of making sure our website works properly. We also collect your data when you complete the contact form, as an indication of interest for any of our products and services. We collect the data you submit, including your contact information, address and order details, corporate information, tax information and payment details. The Personal Data you submit may also include your name, postal address (including billing and shipping addresses), credit or debit card number, telephone number, mobile number, email address, gender, username, or profile picture.

- b. **When we agree to provide services to you or the legal entity you represent or beneficially owner** - then additional personal data will be collected and processed which may include other payment service/banking relationship details, tax ID, credit reference agency data [e.g., Experian], residence, own and/or third-party security [e.g. a bank guarantee], employment position [e.g. as per corporate certificates of directors/shareholders], cash flows and balance sheets and business management information. In order that we may be able to proceed with a business relationship with you, you must provide your personal data to us which are necessary for the required commencement and execution of a business relationship and the performance of our contractual obligations. We are furthermore obligated to collect such personal data given the provisions of the money laundering law which require that we verify your identity before we enter a contract or a business relationship with you or the legal entity for which you are the authorized representative / agent or beneficial owner. You must, therefore, provide us at least with your identity card/passport, your full name, place of birth (city and country), and your residential address so that we may comply with our statutory obligation as mentioned above.
- c. **Personal data we receive from third parties** - To the extent permitted by applicable law, we may receive Personal Data about you from third parties, such as social media services, commercially available sources, business partners. The Personal Data we receive from third parties may include your name, contact information, information about your transactions, activities, purchase history, or relationships with various product and service providers, and your use of certain applications. The information we obtain depends on records regarding your person in various lists, sanction lists and other applicable services and databases. We use such information and content in accordance with this Our Privacy Statement.
- d. **Other information** - is any information that is not intended to reveal your specific identity to us, such as browser information, usage data, information collected through cookies and other technologies, demographic information, geolocation data obtained with your consent where required by applicable law, and aggregated information. This may include your password, birthday, education or graduation year, occupation, financial information (such as your income, investments, portfolio transactions and value, and other information), live event accommodations, and interests and information about your activities in general. Our services use cookies and other tracking technologies to function effectively and deliver certain features. For more information about how we use cookies and tracking technologies, please refer to our Cookie Notice.

4. HOW WE USE YOUR PERSONAL DATA AND OTHER INFORMATION

We may use the Personal Data we collect from and about you for the purposes set forth below. We may use and disclose Other Information for any purpose, except if it is considered Personal Data under applicable law. If we combine Other Information with your Personal Data, we treat the combined information as Personal Data.

We may periodically send promotional materials, with your permission where required, surveys, market research, contest or promotional awards, or notifications related to our products and services. To help make these materials more relevant to you, we may use and combine any of the Personal Data and Other Information we collect to assist us in sending you these materials. We may also use your information (including a telephone or mobile number you may have provided for this purpose) to contact you, including to respond to your comments, inquiries, or requests.

5. HOW WE SHARE YOUR PERSONAL DATA AND OTHER INFORMATION

We may make your Personal Data available to third party service providers, such as contractors, agents or sponsors, who help us manage or provide our products and services by, for example: developing or supporting products and features; sending email messages on our behalf; processing payments; fulfilling orders; delivering subscriptions; auditing; processing data or statistics; and serving, customizing or delivering marketing. These third-party service providers are required to protect Personal Data entrusted to them and not use it for any other purpose than the specific service they are providing on our behalf.

We do not share such Personal Data with unaffiliated third party companies for marketing purposes.

There may be instances when Finserve may disclose your Personal Data, including situations where we have a good faith belief that such disclosure is necessary in order to: protect, enforce, or defend the legal rights, privacy, safety, or property of Finserve, our employees, agents and contractors (including enforcement of our agreements and our terms of use); protect the safety, privacy, and security of users of our products and services or members of the public; protect against fraud and other unlawful activity or for risk management purposes; comply with and enforce the law or legal process, including laws outside your country of residence, contractual obligations, and our policies; or respond to requests from public and government authorities, including public and government authorities outside your country of residence, to the extent permitted by applicable law.

6. HOW WE PROTECT AND RETAIN PERSONAL DATA

Finserve uses a combination of administrative, technical, personnel and physical measures to safeguard Personal Data in its possession against accidental, unlawful, or unauthorized loss, use, access, disclosure, or modification. We make reasonable efforts to ensure a level of security appropriate to the risk of the processing, considering the costs of implementation and nature of the processing of Personal Data. However, no one can guarantee the complete safety of your information. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting Customer Service in accordance with the instructions below.

We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Notice unless a longer retention period is required or allowed by law.

7. YOUR RIGHTS AND CHOICES

We give you many choices regarding our use and disclosure of your Personal Data for marketing purposes.

You may opt out of receiving electronic communications from us (including surveys, notifications, or promotions from us on behalf of third parties), or our sharing of your Personal Data with Finserve Affiliates, by changing your account settings through the appropriate link on the website account services page or following the unsubscribe instructions at the bottom of each email. You can opt out of direct marketing from Finserve Affiliates by using the unsubscribe links they provide or following the steps in their applicable policies.

Please note that there are certain service notifications that you may not opt out of, such as renewal notices and notifications of changes to Finserve products and services or policies.

You can access, review, correct, update, delete or modify your registration or subscription profile information and modify your marketing preferences by contacting Customer Service, as indicated below. If you are in the European Economic Area or Switzerland (collectively, "EEA"), you can also object to or restrict the processing of your Personal Data or exercise your right to data portability.

Where you have provided your consent for our use of your Personal Data, you have the right to withdraw your consent and we will apply your preferences going forward.

For your protection, we may only implement requests with respect to the Personal Data associated with the email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions you began prior to requesting such change or deletion.

We can update this Privacy Notice without prior notice to reflect changes in our practices. Please look at the Effective Date at the top of this Privacy Notice to see when this Privacy Notice was last revised. Any changes to this Privacy Notice will become effective when we post the revised Privacy Notice on the Finserve web site. We will notify you by posting a prominent notice on the Finserve web site indicating we have updated this Privacy Notice. Your use of the Finserve web site or your provision of Personal Data to us following these changes means you acknowledge you have read and accept the revised Privacy Notice.

Your Personal Data may be stored, transferred to, and processed in any country where we have facilities or in which we engage service providers. These countries may be outside your country of residence, including the EU member states, and may have different data protection laws than in your country.

8. CONTACT US

If you have questions about this Privacy Notice or how we or our service providers handle your Personal Data, please contact our Chief Privacy Officer and Data Protection Officers at info@finserveconsultants.com.

Or you may write to:
Attention: Privacy
Finserve Consultants Ltd.
Ayias Zonis 28,
3027 Limassol
Cyprus

If you are located in the EEA, the entity responsible for the collection and processing of Personal Data in connection with the Finserve Consultants Ltd. (contact information provided above). If you have a corporate or group subscription agreement, the entity responsible for the collection and processing of your Personal Data is the entity with whom your company, professor or school has a direct relationship.

We will respond to your questions and complaints about our processing of your Personal Data. If you are not satisfied with our response, depending on where you are located you can contact a supervisory authority or your state's attorney general. Please do not disclose any sensitive Personal Data (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, or trade union membership), social security numbers, or criminal background information when contacting us.