



PRIVACY POLICY

Corinth Capital M.E.P.E. (hereinafter the "Company") is data processor of your personal information. Personal information is information about you that identifies or may identify you. We as a data processor process personal data on behalf of the Data Controller. You can find Privacy Policy of Data Controller at <https://www.goldenburggroup.eu/>.

Corinth Capital is a registered Tied Agent of Goldenburg group Limited an authorised company, established in Cyprus, with registration number 328474. Goldenburg Group Ltd is registered and licensed by the Cyprus Securities and Exchange Commission (hereinafter the "CySEC") with license number 242/14. Corinth Capital is supervised by the Hellenic Capital Market Commission and it is registered in the General Commercial Register with register number 145104301000.

OUR APPROACH

We as a Tied Agent are subject to strict contractual confidentiality and data transfer obligations. We are committed to protect your privacy and handling your data through a transparent manner. We have taken measurable steps to protect the confidentiality, security, and integrity of your Information.

This privacy policy provides detailed description of our data processing, including collection, usage, sharing, protection and about your rights under the Regulation (EU) 2016/679 (General Data Protection Regulation – "GDPR") as well as the Greek national Law No. 4624/2019 on the protection of individuals.

This Privacy Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.

CATEGORIES AND TYPES OF PERSONAL DATA

We have set out below a description of the types of personal information about you which we will process when opening your client account and during ongoing operations. It is necessary to abide the appropriate legislative framework in Cyprus and EU.

Specifically, we must comply with legal obligations under the AML Law (Law 13(I)/2018), as amended, and the current AML Directive (Directive (EU) 2018/843) for the establishment on the Client's economic profile and prevention of money-laundering as well as abide the relevant record keeping obligations under the European Commission Delegated Regulation (EU) 2017/565 ('Delegated Regulation').

Below is a description of the different types of personal information that we will collect and process about you in different circumstances.

Contact Information

- Title
- Name
- Email address
- Telephone number

Payment and tax information

- IBAN
- Tax Identification Number
- Tax residence



Personal Information

- Date of birth
- Place of birth
- Nationality
- Copies of ID, passport, driving license or other identification document

Professional Information

- Employer's name
- Job Title
- Industry of Employment

Financial Information

- Gross Annual Income
- Net Worth
- Anticipated amount to invest

DATA COLLECTION DETAILS

We may collect personal information directly from you or from other persons to provide our services and to perform our legal obligations.

In order to comply with legislative requirements, we record all communication we have with you (electronic, telephone, personal). The recordings will constitute evidence of our mutual communication.

As a general principle, you will provide us with your personal information entirely voluntarily and you may opt not to provide the information requested by us. However, please note that where you do not provide any of the personal information we request, this may mean that we are unable to maintain or provide services or products to you or your organisation.

PURPOSES OF PROCESSING

1. Providing services

We process your personal data for the purpose of creation, administration and usage of the Goldenburg Group's investment services.

2. Managing compliance

We process your personal data to comply with our legal obligations, e.g. screening compliance, recording obligations.

3. Improvement of provided services

We process your personal data to analyse our services and communications with you to improve technology and provide better quality services.

4. Generate and statistical data

We process your personal data to create and process statistical data to improve provided services and to monitor the activity of the users and the effectivity of providing service.

5. Protect the security

We process your personal data to protect the security of and access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities.



6. Monitor and assess compliance

We process your personal data to monitor and assess compliance with our policies and standards, especially to monitor the behaviour of our employees during the communication with clients or potential clients.

7. Execute phone calls

We process your personal data to provide services by telephone or to perform telemarketing, as the form of direct marketing to potential client.

8. Email marketing

We process your personal data to send you customer surveys, marketing campaigns, market analysis, contests or other promotional activities or events.

9. Customer service

We process your personal data to provide customer support services.

10. Fulfilment of administrative, tax and other legal obligations or court orders

We process your personal data to oblige legal requirements, exercise court orders or to defend our legal rights.

In some cases, we base the processing of your data upon your consent. For those purposes, we collect only freely given, specified, informed and unambiguous consent.

LEGAL BASIS FOR PROCESSING

To process personal data following legal grounds apply to justify our processing:

1. Processing is necessary for the performance of the contract concluded between you and Goldenburg Group as Data Controller.
2. Processing is necessary to comply with our legal obligations.
3. Processing is our legitimate interest.

Please note, that for some operations, more than one legal ground will be relevant.

DATA RECIPIENTS

We will share with and disclose your personal information to following categories of third parties:

- Our service providers who assist us to provide our services and process information on our behalf, who have been contracted to provide us with IT and communications service providers, Customer records management providers;
- Professional advisors who provide us legal, accounting, financial services;
- Regulators and Authorities performing their duties in connection with our compliance with legal and regulatory obligations;
- Other Data processors and/or Joint Controllers

In all cases, we will share your personal information with recipients who have a duty to keep it secure and confidential and where we have a lawful reason to share with.

Above all, we as a Tied Agent disclose and share your personal data with Goldenburg Group Ltd.

DATA RETENTION PERIOD

We will only retain your personal information for as long as necessary to meet the reason for original collection, bearing in mind the data minimalization principle. We need to keep your information long



enough to make sure that we can provide our services to you, to comply with and satisfy all legal obligations including our obligations to keep records and to protect our interests.

Your personal information will be deleted when it is no longer reasonably required, or you withdraw your consent (and we are not legally required or otherwise permitted to continue storing such data). We may keep your personal information where such data are required to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

Once the business relationship has been ended, we may keep your data for up to five (5) years for legal, regulatory and other obligatory reasons.

DATA PROTECTION MEASURES

Your personal data will be stored in accordance with the security policy. Your personal data will only be accessed by authorized persons. We encompass privacy by design and default as an approach when implementing systems and applications.

We have taken all the appropriate organisational measures to ensure that your personal data are secured. Moreover, we established Training Policy for employees so as to mitigate any risks that may affect your data. The employees that are processing your data are being trained to respect the confidentiality of customer information and the privacy of individuals. We consider breaches of your privacy as top priority and the Company will enhance its internal procedures to prevent any such event.

Your personal data is backed up, in accordance with our retention policy. Your backup data will be completely deleted as soon as it is possible in accordance with the backup rules. The personal data stored in the backup repositories serves to prevent security incidents and disruption of data availability as a result of a security incident.

While we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data, during transmission through the Internet or while stored on our systems or otherwise in our care, is absolutely safe from intrusion by others. We have taken all the necessary steps to protect the personal information that it holds from misuse, loss, unauthorized accessor disclosure and implemented measures appropriate measures, e.g. SSL technologies for cryptographic data transfer, PCI scanning for active protection of our server, Cryptographic protection of databases, Antivirus software etc. Full and detailed disclosure of security measures would weaken the security; therefore, we state it only partial and not in full scope.

RIGHTS OF DATA SUBJECTS

The Right to access:

You have the right to be provided a copy of the personal information we have about you, as well as information about how we use your personal information. In most cases, your personal information will be provided electronically. However, the way, how the right to access shall be fulfilled depends on the nature of personal data, the medium on which it is stored and with regards to the data protection of other subjects. If you require additional copies, we may charge you a reasonable administration fee.

The Right to rectification:

We take reasonable steps to ensure the accuracy, completeness and timeliness of the information we have about you. If you believe that the information, we hold is inaccurate, incomplete or outdated, please feel free to ask us to modify, update or complete this information by giving us notice.



The Right to be forgotten:

You have the right to ask us to delete your personal data, for example, if the personal data we have collected about you is no longer necessary to fulfil the original purpose of the processing. However, your right must be assessed in the light of all relevant circumstances. For example, we may have certain legal and regulatory obligations, which means that we will be unable to comply with your request.

The Right to object to processing:

In certain circumstances, you may ask us to stop using your personal information. For example, if you think that the personal information, we have about you may be inaccurate, or if you think we no longer need to use your personal information.

The Right to withdraw consent:

We may process your personal data with your consent. We will be informed in advance about such processing. In cases where we process your personal data with your consent, you have the right to revoke that consent at any time. You may withdraw the consent electronically, at the Responsible Person's address, in writing, by notice of withdrawal of consent or in person at the Office. Revocation of consent does not affect the lawfulness of the processing of personal data that we have processed for you.

The Right of data portability: In certain circumstances, you have the right to ask us to transfer the personal information you have provided to another third party of your choice. However, the right to portability applies only to personal data that we have obtained from you under consent or under a contract to which you are a party.

The Right to restrict processing: You have the right to object to data processing that is based on our legitimate interests. If we do not have a valid legitimate reason for processing and you object, we will no longer process your personal data.

The right not to be subject of automated decision making: You have the right not to be subject to a decision based solely on automated processing, including profiling. We do not make automated decisions.

The Right to notify the Data Protection Authority (DPA): If you believe that we are processing your personal data unfairly or unlawfully, you may file a complaint with the supervisory authority: Hellenic Data Protection Authority, Kifisias Avenue 1-3, 115 23 – Athens, dpa.gr.

In all cases, when you want to exercise your rights, give us notices or ask any questions, do not hesitate and contact us at info@corinthcapital.gr.

CONTACT DETAILS

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