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## **AXIA's Privacy Notice**

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The Company "AXIA Ventures Group LTD" (10 Giannos Kranidiotis St., Suite 102, 1065 Nicosia, Cyprus, Switchboard: +357 22 74 2000; Fax: +357 22 74 2001, email: [info@axiavg.com](mailto:info@axiavg.com)) and its affiliated companies, including its subsidiaries, branches, representative offices, directors, officers and employees ("AXIA," "we," or "us") in the context of its daily business collects and processes personal data concerning business or professional contacts ("you" or "your"). AXIA takes your privacy seriously into account because we know you also do. We are committed to maintain the highest level of protection when processing your personal data; In view of the European 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) and for purposes of transparency, please find hereunder some useful information on our company's data protection policy:

### **1. Information we may hold and why**

- 1.1.** Individuals from whom we retain personal data include existing or potential clients, employees, interns, suppliers, service and other party providers, website users and any other party, with whom we have or may have a business or professional relationship currently or in the future.
- 1.2.** Beyond the information that website users voluntarily submit or input on our website (e.g. bios and cover letters for employment positions), we collect various types of information about AXIA's website visitors, such as device-related information (including browser type and IP address) and server log information (including the content downloaded from AXIA's website, the date and time of day of visit, average time spent on the AXIA website and browsing activity). We use this information to better understand what our website users find interesting, facilitate site navigation and enhance the AXIA service.
- 1.3.** Regarding clients, we collect personal and other information in compliance with legal and regulatory requirements. Such information indicatively includes, but is not limited to, name, telephone number, email address, permanent address, date of birth, passport and/or identity card details, etc. Additional information may be requested by AXIA, which uses all the information collected to perform its initial and ongoing know your client and due diligence processes in line with regulatory, anti-money laundering and terrorist financing legislation in order to effectively provide services to its clients and/or conclude transactions and execute stock exchange orders on behalf of its clients, to enhance client experience, provide client support and comply with legal obligations.

We may from time to time include, compile, or aggregate some of your personal information in certain data analysis or reports for internal purposes. When including, compiling, or aggregating personal information for such purposes, we make sure that the information is not shared with any outside party.

### **2. Legal Basis for data processing**

- 2.1.** All information collected and processed pursuant to paragraph **1.2.** is necessary for the purposes of the legitimate interests pursued by AXIA;

**2.2.** We collect and process the personal data referred to in paragraph **1.3.** a) in the context of the conclusion of contracts with our clients, and b) for purposes of compliance with the legislation mentioned herein under paragraph **1.3.**

**2.3.** Additionally, we collect your personal data for direct marketing purposes based on your consent, which you may revoke at any time without detriment.

### **3. How long we retain your personal information**

We retain your personal data for as long as we need it in order to fulfil our purposes set out in this Privacy Notice and/or in order to comply with applicable law.

### **4. How we use “cookies”**

Cookies are small pieces of data that are stored by your browser on your computer’s hard drive, mobile phone or any other device used to access the internet. We use cookies to customize AXIA’s website and improve your experience with the site. We use only those cookies which are absolutely necessary for the operation of the Website. Cookies store anonymous information, such as whether you viewed the site from your mobile device, when or from which IP address.

### **5. Sharing your personal data**

Your personal data may be shared with other companies and/or employees within our Group. We may also share some of your personal data with the following categories of third parties:

- ◆ Banks for the facilitation of payments and money transfers. In order to provide financial services and in connection with everyday business purposes and activities, AXIA may share your personal information with banks when requested to do so in order to make or receive a payment.
- ◆ Competent local and European supervisory and judicial authorities, such as Financial Supervisory Authorities and Tax Authorities, for the purposes of ensuring legal and regulatory compliance.
- ◆ Regulated markets, multilateral trading facilities (MTFs) or organized trading facilities (OTFs), Central Registers and Securities Depositories, Investment Firms, Collective Investment Organizations, such as Mutual Fund Management Companies, issuers of financial instruments concerned by client’s order, as well as legal entities affiliated with AXIA, such as companies executing orders or clearing or settling transactions, as well as in general, depositories, with a view to promote and support trading relationships.
- ◆ Other third parties (for example providers of IT services, legal and financial advisors, external auditors). These third parties may access client’s personal data only if and when required to perform tasks assigned by AXIA that include the processing of your personal data.

In addition to the parties listed above, AXIA may disclose your personal data when it is necessary to satisfy any applicable law, regulation, legal process or governmental request.

### **6. Security of your data**

We place high priority on the security of your personal data. We apply appropriate technical, administrative, electronic and physical safeguards to protect against foreseeable loss, unauthorized access, destruction, misuse, unauthorized modification and improper disclosure. We store all of our data on servers in secure facilities and implement systematic processes and procedures for securing and storing data. All network traffic is being monitored and filtered by a reliable Firewall system with antispy filters while data is being scanned by antivirus software with the latest definitions. We limit access to your personal and financial information to only those AXIA employees who need to know the information in order to perform their duties and we insert our best effort to ensure that third parties who perform services on behalf of AXIA also insert their best efforts to keep your information confidential.

## **7. Access to information – Data subject rights**

Pursuant to the current legal framework on the protection of personal data, you are entitled to exercise the following rights:

- ◆ The right to access, correct or update your personal data at any time;
- ◆ The right to object to or restrict the use of your personal data, under the condition that personal data is not processed for purposes of legal compliance or contractual performance;
- ◆ In case where the processing of your personal data is based exclusively on your consent, you have the right to withdraw your consent at any time and without any detriment.
- ◆ Similarly, you are entitled to ask the erasure of your personal data, under the condition that this particular data processing is based solely on your consent. We will take all reasonable steps to make the requested changes promptly. However, you should be aware that it is not technologically possible to change or delete each and every instance of your data from our systems, and personal data may remain in non-erasable forms. We may retain personal data in our backup systems for the period defined by law, contract or auditing requirements.
- ◆ You have the right to data portability, according to which you can ask to receive your personal data so that you can transfer them to another organization, without prejudice to the applicable data retention period that is required by law.
- ◆ In case where you are dissatisfied with how AXIA processes your personal data, you are entitled to contact the supervisory data protection authority (contact details for Cyprus: Office of the Commissioner for Personal Data Protection, Postal Address: 1 Iasonos str., 1082 Nicosia, Cyprus, P.O. Box 23378, 1682 Nicosia, Tel: +357 22818456, Fax: +357 22304565, Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)).

## **8. Transfer of personal data to third countries / international organisations**

The personal data that AXIA collects may be transferred to, accessed in, and/or stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for AXIA or for one of our service providers.

In such cases AXIA takes all reasonable precautions to apply the appropriate or suitable safeguards set forth by the GDPR. AXIA will take steps in its efforts to make sure that third parties adhere to the commitments set out in AXIA's Privacy Policy. These steps may include reviewing third parties' privacy and security standards, and/or entering into appropriate contracts.

## **9. Updates to our Privacy Notice**

Any changes we may make to our Privacy Notice in the future will be posted on our website. Such modification will become effective immediately upon posting without prior notice. Hence, we encourage you to periodically review this privacy notice to stay informed about how we are protecting the personal data we collect.

## **10. Contact**

If you have any questions or concerns, please contact Ms. Constantina Aggelopoulou, AXIA's Data Protection Officer, on +30 210 741 4480 and/or email: [constantina.aggelopoulou@axiavg.com](mailto:constantina.aggelopoulou@axiavg.com).