

PRIVACY NOTICE
FOR PROTECTION OF
PERSONAL DATA

PRIVACY NOTICE

FOR PROTECTION OF PERSONAL DATA

Nomuscapital Investments Ltd ('we' or 'us' or 'our' or the 'Company') is committed to protecting your personal data. The Company will collect, process and use your personal data in compliance with the Law Providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) (hereinafter the "Law") as amended and/or replaced from time to time, the provisions of Regulation (EU) 2016/679 (hereinafter the "General Data Protection Regulation" or "GDPR") and any other legal and/or regulatory requirements.

PURPOSE OF THIS PRIVACY NOTICE

The purpose of this privacy notice is to provide you with information about the processing of your personal data within the context and/or in view of a business relationship with regard to a product or service of the Company. Furthermore, through this privacy notice you are being informed with regard to your personal data protection rights, as prescribed by the current legislative and regulatory framework.

The type of data we collect and the purpose of their processing depends largely on the type of products and services you have requested or that have been provided to you, or based on the relationship you maintain with the Company.

WHO WE ARE

Nomuscapital Investments Ltd is an authorized Alternative Investment Fund Manager regulated by the Cyprus Securities and Exchange Commission with licence number AIFM20/56/2013. The services the Company is authorized to provide are collective portfolio management, risk management, individual portfolio management and investment advice.

Our registered office is at 9 Kafkasou Street, Aglantzia 2112, Nicosia, Cyprus and we are a company registered in The Republic of Cyprus under company number HE 378129. We act as the data controller when processing your data. Any questions with regards to this Privacy Notice or requests in respect of personal data should be directed to:

9 Kafkasou Street
Aglantzia, 2112
Nicosia, Cyprus
Tel: +357 22 769409
Email: info@nomuscapital.com

INFORMATION THAT WE COLLECT

Nomuscapital Investments Ltd processes your personal information to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

Relevant personal data may include, amongst others:

- a. Identification data, such as surname, forename, identity card/passport number, tax identification number, date and place of birth, nationality and other demographic data.
- b. Communication data, such as postal and e-mail address, landline and mobile phone number.
- c. Financial data and family status data, for instance profession, earnings, dependent family members, tax and income data.
- d. Data regarding your net worth, assets you hold, source of funds and source of wealth.
- e. Data regarding financial obligations, such as size of regular financial commitments, whether these are expected to increase or decrease and amount of debt.
- f. Data on your knowledge and experience in the investment sector, including your ability to bear losses and risk profile.

We do not process Sensitive Personal Data including details on religion, sexual orientation, political opinions, etc.

WE COLLECT INFORMATION IN THE BELOW WAYS: -

In the provision of our services, Personal Data may be collected directly from the data subjects, persons acting on the data subject's behalf and from publicly available sources such as World Check, OFAC Sanctions List Search engine, UN Sanctions List, EU Sanctions List, internet. Information may be collected in the below ways:

- Certified as true copy of the original and/or original documents in hard copy form;
- Soft copy documents directly from the client or authorized representative;
- CVs;
- Bank statements;
- Reference letters;
- Details about payments to and from data subjects;
- Online searches (World Check, OFAC Sanctions List, UN Sanctions List, EU Sanctions List, internet).

HOW WE USE YOUR PERSONAL DATA

We process your personal data in compliance with the provisions of GDPR, the applicable local legislation as amended and/or replaced from time to time as well as any other relevant legislation, rules and/or regulations.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

The Company takes your privacy very seriously and will never disclose, share or sell your data without your consent; unless required to do so by law. We only retain your data for as long as is necessary and for the purpose(s) specified in this notice.

The personal data obtained may be used by us to comply with the requirements of the laws and regulations governing our authorization so that we may be able to perform our duties as follows:

- a. Construct an economic profile for each client;
- b. Conduct a suitability assessment;
- c. Provision of personal data to custodian/broker on a regularly updated basis;
- d. To comply with the requirements on due diligence as per the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 - 2023;
- e. To perform our contractual obligations / provide a service which our Company has been engaged to carry out, e.g. asset management, investment advice, etc.;
- f. To comply with all legal and regulatory obligations we are subject to, including those required from time to time under the laws of the Republic of Cyprus, the European Union and other applicable laws, regulations and directives and obligatory guidelines set by our Supervisory Authority;
- g. To perform a task carried out in the public interest;
- h. To manage our relationship with the data subject;
- i. On the basis of any other legitimate interest (including our legitimate interest and / or those of a third party).

YOUR RIGHTS

You have the right to access any personal information that Nomuscapital Investments Ltd processes about you and to request information about: -

- What personal data we hold about you;
- The purposes of the processing;
- The categories of personal data concerned;
- The recipients to whom the personal data has/will be disclosed;
- How long we intend to store your personal data for;
- If we did not collect the data directly from you, information about the source.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

The following are the rights you have pursuant to the provisions of the GDPR as well as any other relevant legislation in relation to data protection:

- a. Right of access. You have the right to know which of your personal data are being kept and processed by the Company.
- b. Right to rectification. If you realize that the data we hold about you are incomplete or inaccurate, you have the right to request their correction and/or completion. In such a case, in order to verify the accuracy of the new data, we will ask you to provide any necessary documentation from which the need for completion or correction arises. Either way, this constitutes an obligation of every client.
- c. Right to erasure. You have the right to request the erasure of your personal data where there is no valid reason for us to continue their processing. However, please note that we may not always be able to comply with your deletion request due to specific legal reasons, which will be communicated to you.
- d. Right to object. You have the right to object to the processing of your personal data, at any time and for reasons related to your particular situation where the legal basis for such processing are the Company's legitimate interests. In the event that you exercise such right, your data will cease to be processed, unless the Company proves compelling and legitimate reasons, which override your interests, rights and freedoms.
- e. Right to restrict processing. The said right applies in the following cases: (i) your personal data are not accurate; (ii) where processing may be unlawful, however you do not want us to erase your data but rather to restrict it; (iii) where you need us to hold the data even if we no longer require it; or (iv) where you may have objected to our use of your data but we need to verify whether we have legitimate grounds to use it. If you exercise the abovementioned right, the data in question, other than being stored, will be processed only with your consent or for the establishment, exercise or support of legal claims, or for the protection of the rights of another natural or legal person, or for important public interest reasons in the European Union or member state.
- f. Right to data portability. You have the right to receive a copy of your personal data in a structured, commonly used and machine-readable format. You may even ask the Company to transfer your data to any other data controller of your choice.
- g. In case that the processing of your personal data is based on consent, you may withdraw such consent at any time. Nevertheless, this will not affect the lawfulness of any processing that was carried out prior to the withdrawal of your consent.

WAYS IN WHICH YOU CAN EXERCISE YOUR RIGHTS

If you wish to exercise one of the aforementioned rights, you may contact us:

- a. directly at our offices, by filing in the relevant request form "Subject Access Request (SAR) Form" or "Right to Erasure Request Form";
- b. by completing the electronic application form "Subject Access Request (SAR) Form" or "Right to Erasure Request Form" through the Company's website;
- c. by sending an email to the Data Protection Officer at info@nomuscapital.com.

In case of submission of a request to exercise your rights, the Company shall respond to your relevant request within one (1) month of receipt. The time limit may be extended by a further two (2) months, due to the complexity of the request or the receipt of multiple requests. In the case of an extension, you shall be informed accordingly in advance.

The exercise of the aforementioned rights is free of charge. However, we note that the Company may charge an operational fee in cases where your requests are deemed to be unfounded or excessive, in particular due to their repetitive nature.

We draw your attention to the fact that the Company has, in any case, the right to refuse a request regarding the restriction of processing or the erasure of customer data if the processing or maintenance of such data is necessary for the establishment, exercise or support of the Company's legitimate interests, its legal rights or for the Company's compliance with its legal obligations.

The exercise of the right to data portability which takes place under the conditions laid down in the preceding paragraph, does not imply the immediate erasure of the data from the Company's records.

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

SHARING AND DISCLOSING YOUR PERSONAL INFORMATION

Nothing relating to your personal data will be disclosed to anyone, other than in the cases permitted by the legal and regulatory framework in force from time to time. These are:

- d. Where we (or any third party acting on our behalf) are legally compelled to do so.
- e. Where it is in our legitimate interests to disclose information (e.g. to protect us from loss or to recover any loss that we have incurred).
- f. Where disclosure is made at your request or with your consent or to satisfy our contractual obligations towards you.
- g. Where disclosure is required for purposes of compliance with the legal and regulatory framework governing and binding the Company.

The Company uses third-parties to provide specific services and business functions; however, all processors acting on our behalf only process your data in accordance with instructions from us and comply fully with the data protection laws and any other appropriate confidentiality and security measures.

YOUR PERSONAL DATA MAY BE FORWARDED TO ORGANISATIONS AND BODIES INCLUDING BUT NOT LIMITED TO:

- a. Regulatory and other authorities, within the context of their legal obligations and/or authorities.
- b. Outsourced service providers, such as internal auditors and fund administrators.
- c. Credit or other financial institutions that act as the depository and/or custodian to individual portfolio management clients and/or AIFs/RAIFs.

SAFEGUARDING MEASURES

Nomuscapital Investments Ltd takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your personal data. We work hard to protect you and your information from unauthorised access, alteration, disclosure or destruction and have several layers of security measures in place, including: -

- pseudonymisation;
- restricted access;
- IT authentication;
- firewalls;
- anti-virus/malware

TRANSFERS OUTSIDE THE EU

Personal data in the European Union is protected by the Law and the GDPR but some other countries may not necessarily have the same high standard of protection for your personal data. Nomuscapital Investments Ltd does not transfer or store any personal data outside the EU.

CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your personal information to Nomuscapital Investments Ltd, however, as this information is required for us to provide you with our services, we will not be able to offer some or all of our services without it.

HOW LONG WE KEEP YOUR DATA

Your personal data will be kept for as long as you are a client of the Company and/or for as long as you maintain any type of relationship with the Company. We only ever retain personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under the Prevention and Suppression of Money Laundering and Terrorist Financing Laws of 2007 - 2023 to keep your basic personal data (name, address, contact details) for a minimum of 5 years after the termination of the business relationship after which time it will be destroyed.

LODGING A COMPLAINT

Nomuscapital Investments Ltd only processes your personal information in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however, you wish to raise a complaint regarding the processing of your personal data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

Nomuscapital Investments Ltd

Kafkasou 9
Aglantzia 2112,
Nicosia, Cyprus

Tel: +357 22 769 409

Email: info@nomuscapital.com

Office of the Commissioner for Personal Data Protection

Iasonos 1,
1082 Nicosia
Cyprus

Tel: +357 22 818 456

Email: commissioner@dataprotection.gov.cy

COOKIES

When you visit our website, our system automatically collects information about your visit, such as your

browser type, your IP address and the referring website. You can set your browser to not save any cookies of this website and you may also delete cookies automatically or manually. However, please note that by doing so you may not be able to use all the provided functions of the Company's website in full.

REVIEW OF THE PRIVACY NOTICE

We may update this Privacy Notice from time to time to respond to updates in legal, technical or business requirements and developments. We will take appropriate measures to inform you of any changes implemented. Nonetheless, you may always find the latest version of the Privacy Notice on our website.