

PRIVACY POLICY

of Dragon Capital (Cyprus) Limited

Applicable for:	All clients, employees
Version:	1.2
Date of elaboration:	15.01.2018
Elaborated by Compliance /AML Officer	Ina Suveica
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Approved by:	Board of Directors
Approval date:	25.04.2019
Responsible for implementation	Board of Directors

1. General information

1.1. This Privacy Policy is issued by Dragon Capital (Cyprus) Limited (together, "DCCL", the "Company", "we", "us", or "our") and is addressed to individuals who are current or potential clients of DCCL or act as authorized representatives of legal entities or individuals which/ who are current or potential customers of DCCL or are the directors or ultimate beneficial owners of legal entities who are current or potential customers of DCCL, including visitors to our websites (together, "you", "your"). This Privacy Policy is addressed also to individuals who had such business relationship with DCCL in the past.

1.2. DCCL respects your privacy and is committed to handling your personal data with transparency and integrity. When processing personal data provided by you, DCCL is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (hereinafter - GDPR) and any applicable data protection laws or regulations of the Republic of Cyprus. DCCL acts as a controller of your personal data under GDPR, which means that it determines solely or jointly with others, the purposes and means of the processing of your personal data.

1.3. This Policy may be amended or updated from time to time to reflect changes in our practices with respect to the Processing of Personal Data, or changes in applicable laws or regulations. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy.

1.4. All definitions related to personal data can be found in 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 (General Data Protection Regulation)

2. About DCCL

2.1. DCCL is a licensed investment firm (license number 112/10), registered in Cyprus under the registration number: HE171623, having its registered address at Poseidonos, 1 Ledra Business Centre, Egkomi P.C. 2406, Nicosia, Cyprus and regulated by the Cyprus Securities and Exchange Commission (hereinafter – "CySEC").

2.2. The Company is authorized to provide the following investment services: reception and transmission of orders in relation to one or more financial instruments; execution of orders on behalf of clients; dealing on own account; investment advice; underwriting of financial instruments and/or placing of financial instruments on a firm commitment basis; placing of financial instruments without a firm commitment basis and the following ancillary services: safekeeping and administration of financial instruments, including custodianship and related services; granting credits or loans to one or more financial instruments, where the firm granting the credit or loan is involved in the transaction; advice to undertakings on capital structure, industrial strategy and related matters and advice and services relating to mergers and the purchase of undertakings; foreign exchange services where these are connected to the provision of investment services; investment research and financial analysis or other forms; services related to underwriting.

3. Processing your personal data

3.1. Collection of Personal Data is performed from a variety of sources as follows:

- when you provide it to us (for example, where you contact us via email or telephone, or by any other means);
- when we establish business relationship with you (for example, in the course of managing your transactions or during the on-boarding process);
- when you choose to make public, including via social media (for example, we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible);
- from third parties who provide it to us (for example, your employer; our customers; credit reference agencies; and law enforcement and regulatory authorities);
- when you visit our Site or use any features or resources available on or through a Site. When you visit a Site, your device and browser may automatically disclose certain information (such as device type, operating system, browser type, browser settings, IP address, language settings, dates and times of connecting to a Site and other technical communications information), some of which may constitute Personal Data.

3.2. Creation of Personal Data: We create Personal Data about you, such as records of your communication with us, and details of your accounts/ profiles, subject to applicable law and regulation.

3.3. Personal data, including sensitive personal data that we may process, subject to applicable law, are as follows:

- personal details: given name(s); preferred name(s); nickname(s), gender; date of birth; age; marital status; Social Security or national insurance number; passport number(s); other government issued number(s) (tax identification number(s); driving license number(s)); nationality; images of passports, driving licenses and signatures; passwords; photographs; visual images; and personal appearance and behavior;
- family details: names and contact details of family members and dependents;
- contact details: address; telephone number; email address; and social media profile details;
- employment details: industry; role; business activities; names of current and former employers; work address; work telephone number; work email address; and work-related social media profile details;
- education history: details of your education and qualifications;
- financial details: billing address; bank account numbers; credit card numbers; cardholder or account holder name and details; instruction records; transaction details; and counterparty details;
- views and opinions: any views and opinions that you choose to send to us, or publish about us (including on social media platforms); and
- electronic Identifying Data: IP addresses; cookies, activity logs, online identifiers, unique device identifiers, and geolocation data.

3.4. Purposes of processing your personal data:

- AML/KYC purposes: fulfilling our regulatory compliance obligations, including 'Know Your Client' checks and confirming and verifying your identity (including by using credit reference agencies),

screening against government, supranational bodies (including but not limited to the European Union, the Office of Foreign Assets Control and the United Nations Security Council) and/or law enforcement agency sanctions lists, internal sanctions lists and other legal restrictions;

- Client on-boarding: on-boarding new clients and compliance with our internal compliance requirements, policies and procedures;
- Marketing/Prospecting: communicating with you via any means (including via email, telephone, text message, social media, post or in person) subject to ensuring that such communications are provided to you in compliance with applicable law: and maintaining and updating your contact information where appropriate;
- Operation of our Site: operation and management of our Site; providing content and other information to you;
- IT operations: management of our communications systems, operation of IT security/IT security audits;
- Investigations: detecting, investigating and preventing breaches of policy, and criminal offences, in accordance with applicable law;
- Legal compliance: compliance with our legal and regulatory obligations under applicable law, including the recording of telephone lines where required;
- Internal/ External Audit: compliance, controls and other risk management.
- Legal proceedings: establishing, exercising and defending legal rights.

3.5. Legal basis for the processing of your personal data

We have obtained your prior consent for the processing - this legal basis is only used in relation to processing that is entirely voluntary, it is not used for Processing that is necessary or obligatory in any way.

Processing is necessary for the performance of a contract to which you may be a party or in order to take steps at your request prior to entering into a contract with you.

Processing is necessary for compliance with a legal obligation to which we are subject (European Markets in Financial Instruments Directive ('MiFID II') and the corresponding Investment Services and Activities and Regulated Markets Law of the Republic of Cyprus, the European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, the Common Reporting Standard ('CRS'), the Market Abuse Regulation ('MAR'), the European Market Infrastructure Regulation ('EMIR'), the Foreign Account Tax Compliance Act (FATCA) etc.).

We have a legitimate interest in carrying out the processing for the purpose of improving our products or services (to the extent that such legitimate interest is not overridden by your interests or fundamental rights and freedoms).

4. Recipients/ categories of recipients of your personal data

Performing our contractual/ statutory obligations, legitimate business purposes your personal data may be disclosed to:

- supervisory and other regulatory and public authorities, upon request or where required (Unit for Combating Money Laundering (MOKAS), CySEC);
- accountants, auditors, financial advisors, lawyers and other outside professional advisors to DCCL, subject to binding contractual obligations of confidentiality;

- third party processors such as payment services providers, companies who assist us with the effective provision of our services to you by offering technological expertise, solutions and support.
- any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights in accordance with applicable law;
- any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law;

5. International transfer of personal data

Your personal data may be transferred to third countries (i.e. countries outside the European Economic Area), to recipients mentioned in paragraph 4 above, in connection with the purposes set out in this Privacy Policy. We may transfer your personal data to countries that may have different laws and data protection compliance requirements; however processors in third countries are obliged to comply with the European data protection standards when processing your personal data. Where we transfer your personal data to third countries, we do it on the basis of standard contractual clauses adopted by the European Commission.

6. Data Security

6.1. DCCL has implemented appropriate technical and organisational security measures designed to protect your Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of Processing, in accordance with applicable law and regulation.

6.2. You are responsible for ensuring that any Personal Data that you send to us is sent securely.

7. Data Accuracy

We take reasonable steps designed to ensure that:

- your Personal Data that we process is accurate and, where necessary, kept up to date;
- any of your Personal Data that we process that is inaccurate (having regard to the purposes for which they are processed) is erased or rectified without delay.
- from time to time we may ask you to confirm the accuracy of your Personal Data.

8. Data Minimisation

We take reasonable steps designed to ensure that Personal Data that we Process is limited to the Personal Data reasonably required in connection with the purposes set out in this Policy.

9. Data Retention

We will keep your personal data for the duration of our business relationship and for five (5) years after the termination of our business relationship, unless otherwise requested by a competent authority, in line with the provisions of the applicable European and Cyprus legislation on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing, MiFID II and the corresponding Investment Services and Activities and Regulated Markets

Law of the Republic of Cyprus. We may keep your data for longer if we cannot delete it for legal or regulatory reasons. In particular, the retention of data is not limited in time in the case of pending legal proceedings or an investigation initiated by a public authority, provided that in each case the Company has been informed of the pending legal proceedings or the investigation initiated by a public authority within the retention period described hereinabove.

10. Your legal rights

10.1. You have the following rights regarding your personal data we control and process:

- the right to request access to, or copies of, your Personal Data that we Process or control, together with information regarding the nature, processing and disclosure of those Personal Data;
- the right to request rectification of any inaccuracies in your Personal Data that we Process or control;
- the right to request, on legitimate grounds:
 - erasure of your Personal Data that we Process or control; or
 - restriction of Processing of your Personal Data that we Process or control;
- the right to have your Personal Data that we Process or control transferred to another Controller, to the extent applicable;
- where we Process your Personal Data with your consent, the right to withdraw that consent;
- the right to lodge a complaint regarding the processing of your personal data by us. You can lodge your complaint by using the information from our official web page (<http://www.dccl.com.cy/mifid/documents/a268195504726a34bc672faed7e09918-0/Complaints+handling+procedure.pdf>). If you feel that your concerns have not been adequately addressed by us, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. You can find information about submitting a complaint on their website (<http://www.dataprotection.gov.cy>).

10.2. This Policy does not affect your statutory rights.

10.3. Subject to applicable law, you may also have the following additional rights regarding the processing of your Personal Data:

- the right to object, on grounds relating to your particular situation, to the Processing of your Personal Data by us or on our behalf; and
- the right to object to the Processing of your Personal Data by us or on our behalf for direct marketing purposes.

10.4. To exercise one or more of these rights, or to ask a question about these rights or any other provision of this Policy, or our processing of your Personal Data, please use the following address: DC_GDPR@dragon-capital.com

11. Cookies

A cookie is a small file that is placed on your device when you visit a website (including our Sites) which records information about your device, your browser and, in some cases, your preferences and browsing habits. DCCL may process your personal data through cookie technology, in accordance with our Cookie Policy.