

PRIVACY POLICY

1. GENERAL PROVISIONS

- 1.1 This Privacy Policy (the “Privacy Policy”) of FMJ Myriad Capital, UAB (the “Controller”) sets out the terms and conditions for the processing of personal data, irrespective of whether the client (for the purposes of this policy, both existing and future) communicates in person, by electronic means (e.g. through the website managed by the Controller), or by any other agreed means.
- 1.2 When using the website managed by the Controller, the terms and conditions set out in the Privacy Policy shall apply each time a client accesses the content and/or service provided by us, irrespective of the device (computer, mobile telephone, tablet, etc.) used.
- 1.3 Details of the Controller:
- 1.3.1 Registration No. 304039352
 - 1.3.2 Address for correspondence: Upės g. 21, 08128 Vilnius
 - 1.3.3 Tel. +370 645 30102
 - 1.3.4 Email: info@myriadcapital.lt
 - 1.3.5 Website: <http://www.myriadcapital.lt>.
- 1.4 By visiting the website of the Controller, the client agrees to the terms and conditions described in this Privacy Policy. If the client does not agree to these terms and conditions, the client is advised not to visit the website or use the content and/or services of the Controller.
- 1.5 We may change this Privacy Policy in the future and we encourage you to review this Privacy Policy periodically.
- 1.6 The data of the Controller’s clients and/or website visitors shall be collected in accordance with the requirements of the applicable legislation of the European Union (General Data Protection Regulation 2016/679) and the Republic of Lithuania, as well as in accordance with the instructions of the supervisory authorities. The Controller shall take reasonable technical and administrative measures to protect the data collected against loss, unauthorised use and alteration.
- 1.7 Persons under the age of 16 may not submit any personal data through our website. If you are a person under the age of 16, you must obtain the consent of your parents or other legal guardians before providing personal information.
- 1.8 The terms used in the Policy shall be understood as they are defined in the General Data Protection Regulation 2016/679.

2. INFORMATION WE COLLECT ABOUT YOU

The data you provide directly when entering into a service agreement:

2.1 Data collected on natural persons:

Data on natural persons: full name; national identification number; date and place of birth; nationality; taxpayer’s details; telephone number; email address; address; bank account number; Politically Exposed Person (PEP) status;

Identification data: identity document data (ID card/passport number, date and place of issue, photo, signature and other data); IP address; login data (authentication/identification tools provided/created) and other browsing information;

Data on employment status: employment status; name of the workplace; address; field of activity;

Data on financial literacy: educational background; investment knowledge and experience;

Financial data: annual income; value of net assets; value of liquid assets; origin of assets; financial situation (income, assets, types and value of assets; existing financial liabilities); amount to be invested; purpose of the business relationship; investment objectives and needs;

Data on marital status: details of spouse; marital status; number of dependants.

2.2 Data collected on legal entities:

Data on representatives: full name; national identification number; date of birth; country of residence; nationality; telephone number; email address; position held; Politically Exposed Person (PEP) status;

Data on shareholders and beneficial owners: full name; nationality; registered address; national identification number; date of birth; Taxpayer Identification Number (beneficial owner's); Politically Exposed Person (PEP) status.

2.3 The data you provide directly when you apply for a position at Myriad capital:

Personal data: full name; city; telephone number; email address;

Data on work experience: educational background; work experience and related documents; references from former employer; areas of work;

Identification data: IP address and other browsing information if the application is submitted by electronic means.

2.4 We do not collect special categories of data revealing a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, data concerning sex life or sexual orientation.

3. PURPOSES FOR WHICH WE COLLECT AND USE THE INFORMATION

3.1 We collect and use your personal data provided by you or obtained from other sources for the following purposes:

3.1.1 **To identify and contact you:** full name, national identification number, date of birth, address, telephone number and other contact details;

3.1.2 **To comply with anti-money laundering requirements:** **1. On natural persons:** identification data; employment status, details of the employer, job title and field of activity, PEP status, screening for sanctions; origin of funds and assets; ties with Lithuania; **2. On legal entities:** details of the shareholder and beneficial owner(s);

3.1.3 **To comply with the requirements of markets in financial instruments:** educational background; investment knowledge and experience; financial background;

- 3.1.4 **To comply with the law and contracts:** to provide you with information (e.g. notification of an executed order, a report); to respond to your enquiries; to send you important notifications (e.g. about a change in policies, fees) – we use your contact details, as well as the details of the notifications we have sent and received;
- 3.1.5 **To protect our legitimate interests:**
- to comply with the requirements of applicable law, rules, regulations and codes of practice;
 - to comply with the requirements of Lithuanian and foreign authorities (e.g. the Bank of Lithuania, law enforcement authorities) and courts;
 - to investigate or take action against clients who violate our rules and/or contracts or engage in illegal activities;
- 3.1.6 **To ensure remote provision of services:** recording telephone conversations and electronic communications. For this purpose, we use your telephone number, email address; IP address and other data that identify you, as well as the content, duration, timing of the conversation and other technical data;
- 3.1.7 **Direct marketing:** to provide you with information (by telephone, email, etc.) about news on the market in financial instruments, including our offers or offers from our partners (e.g. investment ideas), research carried out, etc., we collect and use your full name, telephone number, email address. **If you do not consent** to the use of your personal data for the purpose of direct marketing, please inform us immediately at info@myriadcapital.lt.

4. WHERE WE GET THE INFORMATION FROM

- 4.1 We receive personal data primarily from you, the Data Subject, but may receive it from other sources:
- 4.1.1 financial institutions;
- 4.1.2 the Bank of Lithuania, the State Enterprise Centre of Registers, the State Social Insurance Fund Board, law enforcement authorities, other registers and state institutions;
- 4.1.3 natural persons when they provide data on spouses, children, other persons related by blood or affinity, co-borrowers, guarantors, collateral providers, etc.;
- 4.1.4 documents provided to us in fulfilment of contractual or legal requirements;
- 4.1.5 legal entities, if you are their representative, employee, founder, shareholder, counterparty, etc.;
- 4.1.6 partners or other legal entities involved in providing services to you.

5. RIGHT TO RECEIVE AND USE INFORMATION

- 5.1 The right of the Controller to collect and use personal data is based on one or more grounds:
- 5.1.1 compliance with a legal obligation (e.g. Law on Markets in Financial Instruments; Law on the Prevention of Money Laundering and Terrorist Financing);
- 5.1.2 an existing contract or a contract to be concluded for the provision of services that require receiving and using personal data;
- 5.1.3 your consent;

- 5.1.4 protecting our legitimate interests:
 - 5.1.4.1 making claims, bringing actions, or taking other lawful steps to avoid or minimise losses;
 - 5.1.4.2 improving the quality of our services; ensuring consistency, continuity and compliance with your expectations.
- 5.1.5 Should you fail to provide personal data or provide incomplete personal data necessary for the conclusion and/or performance of a contract, or which are required by law or contract, we shall not be able to provide services to you.

6. TO WHOM WE MAY DISCLOSE YOUR INFORMATION

- 6.1 We provide your personal data in accordance with the legal requirements. Personal data may be disclosed to:
 - 6.1.1 trading venues for financial instruments, brokerage firms, central or local custodians/depositories of financial instruments, management companies that manage collective investment undertakings/funds whose units you acquire or dispose of, issuers whose FIs you acquire, other entities involved in the provision of services relating to financial instruments (e.g. entities paying dividends, interest);
 - 6.1.2 the Bank of Lithuania, the Financial Crime Investigation Service, Public Institution Deposit and Investment Insurance, notaries, bailiffs, courts and other entities that have the legal authority required by law and can produce evidence of that authority;
 - 6.1.3 Creditinfo Lietuva, UAB;
 - 6.1.4 companies providing mailing, direct marketing, event organisation and related services;
 - 6.1.5 our professional advisors, auditors;
 - 6.1.6 to third parties in connection with the sale, reorganisation of our business or similar changes to our business (e.g. potential buyers, professional advisors).
- 6.2 We undertake not to disclose your personal data to any unrelated third parties, except with your consent and/or in compulsory cases required by law, to entities provided for by law and/or contracts (e.g. the Bank of Lithuania) and in accordance with the procedure established by law.

7. WHAT WE DO TO PROTECT YOUR INFORMATION

- 7.1 Personal data are protected against loss, unauthorised use and alteration. We have put in place physical and technical measures to protect the information we collect for the purposes of providing our services. However, the security of transmission of information over the Internet, by email or via mobile networks may not be guaranteed for reasons beyond the Controller's control, and we would like to remind you that, although we take steps to protect your information, no website, online transaction, computer system or wireless connection is completely secure.
- 7.2 We also use the following processors to process personal data: companies providing hosting, cloud, website administration and related services, companies providing document archiving, advertising, or marketing services, companies that develop, provide, support and improve software, companies providing information technology

infrastructure services, companies providing communication services, consultancy firms, companies that analyse online browsing or online activity and provide services.

8. RETENTION PERIODS

- 8.1 We shall keep your data for no longer than is necessary to achieve the purposes of the processing or required by law, if a longer retention period is laid down therein; and for as long as is necessary for archiving purposes.
- 8.2 We aim not to store outdated, irrelevant personal data, so when they are updated, we only store relevant information. We keep historical data if we are required to do so by law or if it is necessary to conduct our activities.

9. YOUR RIGHTS

- 9.1 The Data Subject whose data are processed in the course of the Controller's activities has the following rights:
 - 9.1.1 the right to be informed of the processing of his/her personal data (right to know);
 - 9.1.2 the right to access his/her data and to be informed on how they are being processed (right of access);
 - 9.1.3 the right to obtain rectification of inaccurate personal data or, taking into account the purposes of the processing, the right to have incomplete personal data completed (right to rectification);
 - 9.1.4 the right to obtain erasure or to stop the processing (except for storage) of his/her personal data (right to destroy and right to be forgotten);
 - 9.1.5 the right to obtain from the Controller restriction of processing where one of the legitimate grounds applies (right of restriction);
 - 9.1.6 the right to data portability;
 - 9.1.7 the right to object to the processing of personal data where such data are processed or are to be processed for direct marketing purposes.
- 9.2 If you no longer wish your personal data to be processed for the purpose of direct marketing, you may send an email to info@myriadcapital.lt or call +370 645 30102 and object to the processing of your personal data for the purpose of direct marketing and/or to the automated processing of your personal data, without stating the grounds for such objection.
- 9.3 The Data Subject shall have the right to submit any request or instruction relating to the processing of personal data to the Controller in writing in one of the following ways: in person or by post to Upės g. 21, Vilnius; by email to info@myriadcapital.lt.
- 9.4 On receipt of such a request or instruction, the Controller shall, not later than within one month from the date of the request, provide a reply and shall carry out the actions specified in the request or shall refuse to carry them out, stating the grounds for refusal. If necessary, the period may be extended by a further two months, depending on the complexity and number of requests. In this case, the Controller shall inform the Data Subject of such extension within one month from the date of receipt of the request, together with the reasons for the delay.

9.5 The Controller may refuse to allow Data Subjects to exercise the rights listed above, except for the objection to the processing of personal data for direct marketing, where the obligation to process personal data is provided for by applicable European Union or Lithuanian legislation, as well as in cases provided for by law, where it is necessary to ensure the prevention, investigation, and detection of crimes, breaches of official or professional ethics, and the protection of the Data Subject’s or other persons’ rights and freedoms.

10. THIRD-PARTY WEBSITES, SERVICES AND PRODUCTS ON OUR WEBSITES

10.1 The Controller’s website may contain third-party banners, links to their websites and services, which the Controller does not control. The Controller is not responsible for the security and privacy of information collected by third parties. You should read the privacy statements that apply to the third-party websites and services that you use.

11. COOKIES

11.1 Like other commercial websites, our website uses a standard technology called “cookies” (see explanation below, “What is a cookie?”) to collect information about how our website is used. The information collected by cookies may include the date and time of your visit, the pages viewed, the amount of time spent on our website, and the websites visited before and immediately after our website.

11.2 We use the following cookies:

11.2.1 technically necessary: they are necessary for the operation of the website to ensure a successful and secure access and provision of the Services;

11.2.2 functional: to remember and recognise you when you visit this website as well as the preferences and settings you choose for automated website personalisation;

11.2.3 analytical: to track your browsing habits and create a profile of how you use the website (number of visits, pages viewed, time of visit, etc.) and use this information to improve the website and make it more effective, for example, so that you can easily find what you are looking for;

11.2.4 targeted: to collect specific data about your behaviour (interests, preferences, etc.) in order to provide you with relevant and targeted solutions or information.

11.3 The cookies mentioned above shall be either session cookies or persistent cookies:

11.3.1 Session cookies. Session cookies are only used during a web session. They disappear from your device when you close your browser or turn off your device.

11.3.2 Persistent cookies. Persistent cookies remain on your device after you close your browser or turn off your device.

Cookie	Purpose of the cookie	Data collected	Are data transferred to third parties?	How long is the cookie stored?
_fbp	Used by Facebook for user recognition.	Unique ID number	Yes	2 hours

_ga	Used by Google Analytics for user recognition.	Unique ID number	Yes	2 years
_gat	Used by Google Analytics to measure the frequency of queries.	Numeric value (1)	Yes	1 minute
_gcl_au	Used by Google AdSense for user recognition.	Unique ID number	Yes	3 months
_gid	Used by Google Analytics for user recognition.	Unique ID number	Yes	1 day
agreeCookiePolicy	Used to identify whether the user has clicked the consent button in a cookie statement.	Numeric value (1)	No	1 year
pll_language	Used for recognising the selected website language.	Language ("It" or "en")	No	1 year

11.4 What is a cookie?

Cookies are alphanumeric identifiers that we provide and store on your device through your browser for record-keeping purposes. Some cookies make it easier for you to navigate our website, while others are used to speed up the login process or to allow us to track your activity on our website (see description of the cookies we use above). More information about cookies can be found at aboutcookies.org.

11.5 Third-party cookies

We use third-party (such as Google Analytics) cookies to view our website statistics. To opt out of Google Analytics, go to: <https://tools.google.com/dlpage/gaoptout/>.

We use these tools to help us improve our Services, performance and visitor experience. These entities may use cookies and other tracking technologies to provide their services. These third parties may collect your device ID, IP address or other information about your use of the Services as part of the analytics they provide to us.

11.6 What if you do not want cookies?

When you open our website, you shall be given the opportunity to consent to us saving cookies and other similar data on your device as explained above. If you wish to remove existing cookies from your device, you can do so using your browser settings. If you wish to block the subsequent use of cookies on your device, you can also do this in your browser settings.

Please note that if you do not accept the use of cookies, or if you delete or block them, your browsing experience shall be affected as parts of the website may no longer function. Our system shall provide cookies as soon as you agree, unless you have set your browser settings to block cookies.

11.7 How about other websites linked to our website?

This website may contain links to the websites of other companies or individuals who are not covered by this policy. We are not responsible for the practices of these websites, nor for the information or content on them. We are not responsible or liable for any processing of your personal data on those websites. Please refer to the privacy policies of the relevant third parties for information on the processing of personal data and on their use of cookies.

12. HOW CAN YOU ACCESS AND OBTAIN RECTIFICATION OF YOUR PERSONAL DATA?

12.1 If you have any questions regarding the processing of your personal data as described above, you may submit an enquiry to us by email to info@myriadcapital.it and we shall respond to your enquiry as soon as possible. You may also request access to, or the destruction or rectification of, incorrect, incomplete or inaccurate personal data.

13. CHANGING OUR PRIVACY POLICY

13.1 We may change this Privacy Policy from time to time as may be necessary to reflect changes in applicable laws and regulations or other requirements applicable to us, changes in technology or changes in our business. Any changes to our Privacy Policy shall be posted on the website.

13.2 We may change this Privacy Policy without prior notice of additions or changes. Your continued use of the website shall constitute your acceptance of the updated policy.

14. WHAT SECURITY MEASURES DO WE USE?

14.1 We are committed to the confidentiality of your information. We implement various technical and organisational security measures to protect your information. Please remember that while we strive to provide reasonable security for the information we process, no measures are completely fail-safe and can guarantee protection against all possible security breaches at all times.