



PRIVACY POLICY

November 2023, Version 1.0

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1. Introduction

Viverno Markets Ltd (hereinafter "Viverno" or the "Company") takes privacy seriously and is committed to processing Personal Data in line with the GDPR.

This notice ("Privacy Notice") defines the way the Company processes the Personal Data of natural persons while setting forth the rights of the Data Subjects. This Privacy Notice applies to the extent:

- you are either a current or potential customer of the Company (including if you have expressed your interest in the Company's products and/or services), or
- you represent a client of the Company, or
- you are an authorized representative/agent/introducer/director/secretary/contact person or a shareholder/beneficial owner of a legal entity that is either a client or has or intends to conduct business with the Company or is representing and/or acting on behalf of a client, or
- you provided information and/or confirmation to the Company regarding the residential address of a client of the Company, or
- you have certified and/or notarized documents concerning a client of the Company, or
- you are an employee of the Company, or
- you have indicated an interest in an opening in the Company, or
- you have provided or are requested to provide references for a client (including potential clients) or a member of staff of the Company, or
- you are connected with a client or a member of staff or a business associate of the Company and your Personal Data is provided under a regulatory obligation e.g. to manage possible conflicts of interest and other regulatory obligations, or
- you have been in the past any of the above (please refer to section 7), or
- you now have or had any business relationship with the Company in the past including being a shareholder or bondholder, or
- your Personal Data have or may in the future be lawfully obtained by the Company in the normal course of its business.

Data processing may potentially take place at a Group level as provided under the General Data Protection Regulation 2016/679 ("GDPR"), where a legitimate interest is justified. In this context, the Group is the Company, any company under a common control (*i.e. the power to direct or cause the direction of the management and policies of a person or an organization, whether by ownership of stock, voting rights, by contract, or otherwise*) or ultimate beneficial ownership with the Company and their respective subsidiaries and parent companies.

The Personal Data processed by the Company varies depending on the relationship between you and the Company.

2. Definitions

Unless otherwise provided, for the purposes of this Privacy Notice:

"Company" means Viverno, a limited liability company, incorporated under the laws of the Republic of Cyprus, operating as an investment firm, with company registration number HE300153, authorized and regulated by the Cyprus Securities and Exchange Commission ("**CySEC**") under license number 199/13 having its registered office at Ioanni Stylianou 6, 2nd Floor, Office 202, 2003, Nicosia, Cyprus.

"DPO" means the Data Protection Officer of the Company

"GDPR" means the EU General Data Protection Regulation 2016/679

"Personal data" means any information relating to an identified or identifiable natural person ("**Data Subject**"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person

"Processing" refers to any operation or set of operations which are performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction

"Controller" means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law

"Supervisory Authority" means the Office of the Commissioner for Personal Data Protection in the Republic of Cyprus, which is responsible for monitoring the implementation of Regulation (EU) 2016/679 (GDPR)

3. Data Processing

Your Personal Data will be held and processed by the Company.

For any inquiries regarding your Personal Data and your rights under the GDPR contact the Company's DPO, as provided below:

Viverno Markets Limited

Ioanni Stylianou 6, 2nd Floor, Office 202, 2003, Nicosia, Cyprus

DPO: Mr. Stelios Moyseos

E-mail: dpo@viverno.com

4. Types of Personal Data Processed

The types of Personal Data processed by the Company depend on your relationship with the Company. The Company may collect and process any of the following types of Personal Data:

Data type	Description
Identification data including national identification numbers	Information that can directly identify you such as name, surname, date of birth, gender, place of birth, citizenship, and identification numbers or codes given or issued by a governmental service such as national social insurance number, tax identification code, ID number, Passport number, Driver's license number and other personal data of similar type.
Contact	Contact details such as telephone number, home address, work address, and email address.
Financial	Information on your personal wealth including your assets, details of the assets, streams of incomes, expected incomes, personal financial position, salary, economic status, account numbers, IBAN, and other financial information. Financial data to be obtained include knowledge and experience with MiFID II products (e.g., shares, bonds, funds, and interest rate/currency products), your investment strategy and scope, details of your personal investment portfolio, and personal financial objectives.
Socio-Demographic	This includes details about your work or profession, nationality, education, marital status, and where you fit into general social or income groups.
Transactional	Details about payments to and from your accounts with the Company and tax information. This includes data concerning your accounts and cards, like account number, IBAN, card number, and card issuance and expiry dates.
Contractual	Details about the products or services we provide you with.
Locational	Data we get about where you are. Such data may come from your mobile phone, the address where you connect a computer to the internet to access our website(s) and platform(s).
Behavioral	Details about how you use our products and services.

Technical/Digital	Details of the devices and technology you use, your digital activity and systems logs which are captured by the Company's information technology systems when you use them, IP addresses, and the credentials you use to connect to our digital platforms available.
Data type	Description
Communications	What we learn about you from letters, emails, and conversations between us.
Social Relationships	Your family, associates, and other relationships you declare for the purposes of our business relationship.
Documentary	Details about you that are stored on documents in different formats, or copies of them. This could include things like your specimen signature, passport, identity card, driving license or birth certificate.
Video and sound recordings	Sound recordings and video footages recorded by the Company when you voice or video call us or have an online meeting with us.
Special categories of Personal Data	<p>Certain types of Personal Data are more sensible and are considered special, by law.</p> <p>The Company may process data relating to criminal convictions and offences as part of the Company's initial and periodic review, as required by law. The legal basis used for such processing is the Legal Obligation.</p> <p>Through all financial transactions, various types of behavior patterns can be revealed, which may include special categories of personal data. Therefore, there is a good chance that the Company, when processing information about financial data transactions will also process special categories of personal data.</p>

5. Collection of Personal Data

The Company collects Personal Data from the following sources:

- Directly from you
 - When you apply for the Company's products and services.
 - When you contact the Company, whether in writing, by phone, or through other online means.
 - When you use the Company's website(s), platform(s), and Application Programming Interface (APIs)).
 - In financial reviews and interviews.
 - In surveys and tests.
 - If you take part in the Company's competitions or promotions.

- When it is necessary within the context of the business relationship with you.
- Indirectly, for example through
 - Your authorized representatives.
 - Persons/Organizations introducing you to the Company (i.e., Fiduciary Service Providers, Approved Introducers).
 - Persons providing references for you, including your past employers, landlords, or cohabitants.
 - Customers or members of staff providing your contact details in order for the Company to receive references from you or as part of the reporting of a conflict of interest.
 - The legal entity you represent or in which you act as agent/introducer/statutory director/secretary/contact person/shareholder/beneficial owner or any other role which is necessary for the execution of the Company's business operations with that legal entity.
- From other publicly accessible sources such as:
 - the Land Registry Office,
 - the Registrar of Companies and Official Receiver,
 - the Bankruptcy Archive,
 - international commercial registers and regulatory authorities
 - the Press/Media, and
 - third-party service providers that are responsible for verifying your credentials and possible convictions.
 - the Internet.
- Other resources such as:
 - Other Group companies for the purposes of managing operations and/or risks at a group level as well as providing our services efficiently and effectively.
 - Other service providers for the purposes of receiving information necessary for our enhanced due diligence obligations under the AML Law.
 - Correspondent companies, other financial institutions, card associations, and companies that process payments such as d, for the purposes of executing your payments and deposits.
 - Government and law enforcement agencies, risk intelligence databases or other databases where it is necessary to assess the risk undertaken by the Company (i.e., credit risk, money laundering risk)

6. Legal Basis and Purpose of processing Personal Data

(a) Legal Basis

The Law allows the Company to process Personal Data, including sharing Personal Data outside the Company, to extent that there is a valid reason to do so. The Company will process Personal Data provided that one or more of the following reasons is applicable:

To fulfil a contract you have with the Company or to take any steps, at your request, prior to entering into a contract with the Company - The Company processes your Personal Data to provide you with investment and financial services, in accordance with the contracts concluded with you and/or in the course of your application prior to the conclusion of a contract in order to complete your acceptance process as a potential customer for the specific product/service, and/or to execute your orders.

When it is the Company's legal obligation to process your Personal Data – The Company processes your Personal Data to comply with legal and regulatory requirements governing its operations such as investment services legislation, anti-money laundering legislation, tax legislation and regulations, directives/ guidelines issued by the Company's regulatory Authorities (including the Cyprus Registrar of Companies, Central Bank of Cyprus, European Central Bank, CySEC, ESMA, EBA, and any other authorities, such as Tax Authorities).

When it is in the legitimate interests of the Company or another person with whom the data are shared – The Company may process your Personal Data in case it has a legitimate interest to do so, provided this interest does not unfairly go against what is right and best for you. A legitimate interest is when the Company has a business and/or commercial reason to use your Personal Data. When the Company bases the Processing of your Personal Data on legitimate interest you have the right to object at any time to such Processing, on grounds relating to your particular situation. The Company shall no longer process your Personal Data unless it demonstrates compelling legitimate grounds for the Processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims. Where Personal Data are processed for the purposes of direct marketing, you have the right to object to such Processing, including profiling to the extent that it is related to such direct marketing, whether about initial or further Processing, at any time and free of charge. Where you object to Processing for direct marketing purposes, Personal Data shall no longer be processed for such purposes.

When you consent to the use – The Company may base the Processing on your consent if such consent is freely obtained through your positive actions, it is specific and has been given after you have been clearly informed about the details of the Processing and of your right to withdraw your consent at any time without thereby affecting the legality of the Personal Data processed prior to the withdrawal.

When it is in the public interest or in the exercise of official authority vested in the Company – The

Company may process your Personal Data when it is necessary for the public interest under the official authority granted to the Company and provided that the Processing is performed lawfully and fairly, in a clear, precise and transparent manner.

(b) Purposes of Processing

Your Personal Data may be processed based on the purposes listed in the table below. This Processing may take place at Company or Group level.

Purposes of Processing	Contract	Legal Obligation	Legitimate interest	Consent	Public Interest
<p><u>Provision of services</u></p> <p>We need to process your Personal Data for the Company to be able to review your application for the Company's products and services and to provide you with the products and services requested including but not limited to Mobile App, Online Trading, APIs, services through the customer contact center, e-signature applications, payment services, factoring, trade finance, customer support center, account management etc.</p> <p>Personal Data processed shall be restricted to the necessary data for the purposes of the service(s) received. For example, when you receive trading services the Company will require a detailed analysis of your financial data whilst this data may not be required if you are an employee of the Company.</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To perform company searches by third-party service providers. • To process the personal data of third parties participating in payments to/from clients • To obtain technical support on Company systems from third party service providers (vendor may process personal data when troubleshooting / updating systems) • To facilitate the conclusion of a service using third parties such as PSPs e.g. 	X	X

			<ul style="list-style-type: none"> • To record calls with nonclients when they seek information from the Company's Call Center • To give access to clients' representatives on various Company's channels/applications to serve the purposes of the Company's clients • To provide general information about the Company and its products. 		
<p><u>Comply with Anti-Money Laundering (AML) regulatory framework</u></p> <p>We need to process your Personal Data in order to comply with our regulatory obligations under AML i.e. we need to review and update your Personal Data /economic profile and transactional activity, we need to exercise due diligence and investigate the source and destination of funds of the transactions you carry out through the Company, we need to carry out further investigations in case we identify transactional activity which is not within your profile, we need to assess your data in case you will act as an approved introducer for clients of the Company.</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> • To exercise due diligence in relation to new clients' onboarding or to existing clients at the review of the customer relationship or their transactions by carrying out searches in available databases either directly or through third-party service providers. • To defend the Company in litigation or complaint handling procedures. 	X	X

<p>The Company may use external service providers to obtain information in order to comply with its enhanced due diligence obligations under the AML Law.</p>				
<p><u>Manage risks</u></p> <p>In our operations we are called to manage various risks and ensure that our clients, counterparties, stakeholders and the Company are properly safeguarded against those risks. For the purposes of managing those risks we may need to process your Personal Data e.g. monitoring your activities on our platforms and periodically reviewing for the purposes of security, fraud, and crime prevention, when validating financial models used by the Company, when monitoring liquidity and risks when overiewing the overall Company's risk appetite, when investigating complaints, when enhancing IT security, when handling conflict of interest. Indicatively the risks managed include:</p> <ul style="list-style-type: none"> ● Crime and fraud ● Cyber & Information security ● Operational risks ● Financial risks ● Legal risks ● Breaches and other incidents ● Regulatory risks ● Conflict of interest 	<p>X</p>	<p>X</p>	<p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> ● To implement proper monitoring tools to prevent malicious activity. ● To investigate information security incidents and/or fraud suspicions arising from alerts created from specialised systems used by the Company. ● To monitor the access to the Company's premises and other locations to ensure security of staff and clients' data and Company's assets and equipment. ● To manage possible conflicts of interests 	

<p><u>Preparation of Financial Statements</u> <u>/ Manage costs and income</u></p> <p>We may process your Personal Data during the preparation of our financial statements, during assessment, management, and reporting of costs and income, during setting up the models for the parameters of provisions (including at Group level).</p>	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To facilitate the financial affairs of the Company 	X	
<p><u>Internal Operations</u></p> <p>The Company may process your Personal Data during administrative internal operations such as:</p> <ul style="list-style-type: none"> monitoring data quality and accuracy, providing operational support to the client-front units, management of customer relationships through specialized systems e.g. CRM-Customer Relationship Management system, through call & video recordings of communications with you, issuing access cards to control visits at its buildings preparing & using internal reports and lists (such as the Insider List required under the Market Abuse Regulation), which may include your Personal Data which are used by the relevant units of the 	X	X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> To ensure that data kept is accurate and up to date and to check for any discrepancies. To record calls for better service / improvement of services. To provide support/advice to departments of the Company, where requested. To be able to communicate, when necessary, with the third party providers. To monitor the Company's portfolio for the purposes of liquidity, capital adequacy and strategy monitoring. 	X	

<p>Company for the purposes of executing their work,</p> <ul style="list-style-type: none"> • during the handling of requests which require expert opinion such as legal opinion, or opinion from other control functions and experts such as Compliance Unit, Data Protection Office, Information Security, Tax, IT and Organisation & Methods, • checking the smooth operation of automated processes i.e. alerts on the platform, charges, content of letters/emails produced automatically, etc). • for anonymization and for statistical analysis of the usage of the Company's products and services and/or for testing the Company's products and services as part of the Company's Product Governance Policy and for the purposes of further product / service enhancement or development of new products / services aiming value added to clients. • maintaining and publishing internally, with access as deemed necessary, the names and other necessary details of approved counterparties i.e., valuers, introducers, translators or other counterparties such as technical support counterparties, cleaners, landlords for rented 			<ul style="list-style-type: none"> • To ensure that automated processes run smoothly e.g., the maintenance fee is correctly charged. • To be able to provide reports and information to the Board and its Committees in order to successfully fulfil their obligations. • To check/confirm data to be sent to clients. 		
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<p>property, authorised signature books of banks, etc.</p> <ul style="list-style-type: none"> • for collecting and recovering money that is owed to the Company. • Defending the Company's rights and interests. • Responding to third-parties premised that these parties are authorised to contact the Company and receive information concerning the Company's clients. • For automated processes. <p>Additionally, the Company may share your personal data with third parties as listed in section 5 of this Privacy Notice for the internal operation purposes listed below:</p> <ul style="list-style-type: none"> • to enable the Company to obtain valuations on properties offered as securities to external valuers • to enable the Company to defend itself in court actions – to external legal advisors • to enable the Company to comply with court or regulatory orders – to regulators or the police or regulatory agencies • to enable the Company to manage vendor relationships in outsourcing arrangements - to third party vendors including cloud service providers and Information Technology support. 						
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<ul style="list-style-type: none"> ● to enable the Company to manage its correspondence needs to couriers ● to enable the Company to insure its risks to insurance brokers and insurance companies ● to enable the Company to comply with its reporting regulatory obligations to reporting platforms <p>Furthermore, the Company may obtain information from third-party sources as listed in section 3 of this Privacy Notice for the internal operation purposes listed below:</p> <ul style="list-style-type: none"> ● to establish the ownership structure and status of companies clients of the Company from the Registrar of Companies ● to screen for sanctions and other negative information on clients – world check and/or other relevant databases. Please refer to the “purpose” - “Comply with Anti-Money Laundering (AML) regulatory framework” for more details. 				
<p><u>Administration of Company’s systems</u></p> <ul style="list-style-type: none"> ● The Company may process your Personal Data to ensure the smooth operation of the systems utilised in its operations i.e. to administer user access rights, for 			<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> ● To be able to administer the Company's systems in order to ensure 	

<p>troubleshooting, configuration, infrastructure management, data integration between systems used, administer parameters and proxies on web traffic and email gateway.</p>			<p>their smooth and accurate, operation and/or administration</p> <ul style="list-style-type: none"> ● To provide access to Company systems where necessary for members of staff to be able to perform their tasks and duties. ● To access data in systems in order to identify system glitches. ● To provide access to third-party service providers to support the IT Department with the heavy workload and for the implementation of new modules and features in various systems. 		
<p><u>Audits / Investigations</u></p> <p>The Company may process your Personal Data during audits and/or investigations carried out either by internal auditors and other control functions or by external auditors and/or regulators on the Company's operations.</p>		X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> ● To be able to enhance the Company's controls and to outsource the internal audit of Information Technology functions and or other departments, 		

			where external expertise is required.		
<u>Responding to complaints</u> The Company may process your Personal Data when a complaint is submitted (including complaints in relation to harassment) for the purposes of responding and/or handling that complaint.	X	X	Legitimate interest pursued: <ul style="list-style-type: none"> To process any personal data provided by you and/or held by and/or given to the Company in order to respond to and/or handle the complaint received. 	X	
<u>Communication</u> The Company may process your Personal Data for the purposes of communicating with you indicatively for the following reasons: <ul style="list-style-type: none"> to provide general information on Company issues i.e. closing of branches, working hours etc. to provide specific information for a specific product/service you hold to provide you with account statements, charges analysis, transaction vouchers/ 	X	X	Legitimate interest pursued: <ul style="list-style-type: none"> To communicate with clients in relation to general information on Company's issues, or specific information for a product/service of the customer, or for general campaigns to inform clients about similar products and/or 	X	

<p>transactional activity, interest certificates etc.</p> <ul style="list-style-type: none"> ● for marketing purposes (i.e. direct marketing via mail/post and live calls with human intervention, direct marketing via electronic means without human intervention) ● to inform you of the results of campaigns/competitions/draws to which you participated. ● to inform you of cases of fraud and or breaches. ● The Company may also communicate with natural persons who are not clients of the Company: ● whose Personal Data were obtained in conferences etc. in order to promote Company's products and services ● If your contact details have been obtained by a member of staff for the purposes of contacting you on emergency situations or by a member of staff/prospect member of staff or customer for the purpose of receiving references. ● for direct marketing (even if the Personal Data/contact details are available to sources open to the public) ● If you are an investor or market analyst or participant to provide updates/resolving queries in relation to the financial performance of the Company, in accordance with 			<p>services of the Company.</p>		
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<p>your requests or if you are a shareholder or bondholder receiving notifications in accordance with legal requirements or in general.</p>				
<p><u>Competitions/ Promotions</u></p> <ul style="list-style-type: none"> • The Company may carry out promotional and rewarding competitions on social media. Your Personal Data may be processed by the Company for the purposes of the competitions in accordance with the terms disclosed from time to time in relation to the specific competition, provided that you decide to participate. • The Company may also process your Personal Data during competitions/campaigns if you are an existing client of the Company using its products/ services to reward you for your commitment and preference to the Company's products. The campaigns may be executed via any of your contact details provided to the Company i.e., via sms, email, mail, call. • Additionally, the Company may process your Personal Data if you are participating in shooting and photographic material to be used in 	<p>X</p>		<p>X</p> <p>Legitimate interest pursued:</p> <p>To promote the usage of the Company's products and reward clients through the opportunity to win gifts and benefits.</p>	<p>X</p>

<p>competitions/ promotional material.</p> <ul style="list-style-type: none"> Where needed a separate specific Privacy Notice will be provided to you. 				
<p><u>Record keeping</u></p> <p>The Company needs to keep records of its activities as required by the regulatory framework and/or to defend its legal rights and interests pursued.</p> <p>Your Personal Data will be maintained under this record-keeping obligation. You may refer to the specific paragraph in this Privacy Notice regarding the record keeping provisions.</p> <p>In this regard the Company may outsource record keeping to companies specializing in these services.</p>		X	<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> Outsourcing for cost saving and expert services 	
<p><u>Cookies</u></p> <p>When you visit our website or use our Digital Products (like the Company's mobile Apps) our system processes information about your visits such as your IP address and your browser type.</p> <p>Cookies are used to adapt the language of our website, or our Digital Products based on the end user's location.</p>			<p>X</p> <p>Legitimate interest pursued:</p> <ul style="list-style-type: none"> to monitor and analyse the functionality and accessibility of the Company's web pages/applications. 	

<p>For more details, please refer to Appendix A of this policy.</p>					
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(c) Profiling and Automated decision making

“Profiling” means any form of automated Processing of Personal Data consisting of the use of Personal Data to evaluate certain personal aspects relating to a natural person, in particular to analyze or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behavior, location or movements.

Specifically, profiling is a procedure which may involve a series of statistical deductions. It is often used to make predictions about people, using data from various sources to infer something about an individual, based on the qualities of others who appear statistically similar. Profiling may involve three distinct stages:

- Personal Data collection;
- automated analysis to identify correlations;
- applying the correlation to an individual to identify characteristics of present or future behavior.

The Company does not make decisions solely on the basis of automated Processing; however, part of your Personal Data may be automatically processed as part of our assessment of certain personal aspects (profiling), indicatively for the following purposes:

- a) Assessments for the purpose of combating money laundering and fraud.
- b) Marketing of new products and services of the Company and/or of companies within the Group or of third parties cooperating with the Company, as long as you have given your consent.

7. Who receives your Personal Data

(a) Within the Company

Within the Company, access to your Personal Data is given to those officers who require such access to perform the Company's contractual and legal obligations, and other internal activities.

(b) Outside the Company

Access to your Personal Data may also be given to **third-party service providers and agents employed by the Company** to enable more efficient and effective execution of its business operations, provided

that an appropriate legal basis exists. Except where they act as separate controllers, service providers and agents appointed by the Company are required to follow the Company's instructions in relation to the Processing of Personal Data, provide written assurances that Personal Data will be processed in accordance with the GDPR, and the information shared will be restricted to the minimum necessary for the specified and explicit purposes.

These are mainly organizations from the categories listed below:

- Visa / Mastercard / JCC / SEPA Direct Debit Scheme, other payment service agents (PSPs) and participating merchants
- Third Party Providers (TPP) where APIs are used at the request of the customer
- Fund Managers/ Trustees /Agents for reporting purposes (such as those required under MiFiD II)
- Introducers
- Couriers
- IT systems/solutions providers and cloud service providers
- Insurance Companies / Re-insurance agents
- Advisory and professional service providers
- Auditing service providers / Forensic Auditors / Statutory Auditors
- Legal Advisors
- Companies offering marketing services /advertising agencies/ conference organizers
- Record-Keeping companies
- Printing companies
- Credit reference agencies
- Providers of data screening services for anti-money laundering purposes
- CCTV system providers
- Other service providers supporting any of the operations of the Company.

Access to your Personal Data may also be given to **credit institutions, financial services institutions, and comparable institutions** for the purposes of facilitating payment transactions and/or lending.

The Company may be required to share your personal information **with regulatory and other authorities and public bodies** in Cyprus and the European Union, either under a legal obligation or on the basis of the Company's legitimate interests:

- The Central Bank of Cyprus, the European Central Bank, the European Banking Authority
- The Cyprus Securities and Exchange Commission
- The police and MOKAS
- Tax authorities
- Financial Ombudsman
- Commissioner for Personal Data Protection

- Other regulators, authorities and public bodies insofar as a statutory or official obligation exists.

Additionally, the Company may have a legitimate interest in transmitting your Personal Data **within the Group** for internal administrative purposes and/or a legal obligation to do so i.e. for group regulatory reporting.

7.1. Transfer of Personal Data to third countries or international organizations

The Company will only transfer your Personal Data to a country outside the EEA (a "third country"):

- If this is required for the execution of your orders (for example, when payments are made to a person in a third country, or for payment orders through a correspondent bank in a third country, such as dollar payments or for card services offered for example by VISA and Mastercard);
- if this is prescribed by law (for example, reporting obligations under tax law);
- in the context of data processing undertaken by third parties on behalf of the Company and where appropriate, on a Group level, with any of the offshore Group entities.

If the Company does transfer your Personal Data to a third country, the Company will make sure that your Personal Data is protected in the same way as if it was being used in the EEA. The Company will apply one of the following bases:

- Transfer it to a third country with privacy laws that give the same protection as the EEA, as certified by an adequacy decision of the European Commission.
- Transfer it to organizations that comply with binding corporate rules or an approved code of conduct or certification mechanism that requires its protection to the same standards as applicable in the EEA.
- Put in place a contract with the recipient which includes the standard data protection clauses adopted by the European Commission or adopted by the supervisory authority and approved by the European Commission.
- Where the recipient in the third country has signed up to a code of conduct, which has been approved by a competent supervisory authority. The code of conduct must include appropriate safeguards to protect the rights of individuals whose Personal Data is transferred, and which can be directly enforced.
- Where the recipient in the third country has a certification, under a scheme approved by a competent supervisory authority. The certification scheme must include appropriate safeguards to protect the rights of individuals whose Personal Data is transferred, and which can be directly enforced.

You may learn more about these on the European Commission's website [International dimension of data protection | European Commission \(europa.eu\)](https://ec.europa.eu/data-protection/).

In the case where none of those bases apply, your Personal Data may still be transferred to a third country under the following conditions/ derogations, where:

- you explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers due to the absence of an adequacy decision and appropriate safeguards;
- the transfer is necessary for the performance of a contract between you and the Company or the implementation of pre-contractual measures taken at your request;
- the transfer is necessary for the conclusion or performance of a contract concluded in your interest between the Company and another natural or legal person;
- the transfer is necessary for the establishment, exercise, or defense of legal claims;
- the transfer is necessary to protect the vital interests of the Data Subject or of other persons, where the Data Subject is physically or legally incapable of giving consent.

Where a transfer could not be based on any of the above, a transfer to a third country or an international organization may take place only if:

- the transfer is not repetitive,
- concerns only a limited number of Data Subjects,
- is necessary for the purposes of compelling legitimate interests pursued by the Company which are not overridden by the interests or rights and freedoms of the Data Subject, and
- the Company has assessed all the circumstances surrounding the data transfer and has, based on that assessment, provided suitable safeguards with regard to the protection of Personal Data.

In such a case the Company shall inform of the transfer the supervisory authority and the relevant persons whose Personal Data will be transferred and expressly state the compelling legitimate interests pursued.

7.2. Cloud Services

The Company uses cloud technology to store your Personal Data referred to in section 3 above. The cloud service providers used by the Company and their data centers, are in the European Union and thus bound by the GDPR requirements.

Despite this, there are cases where Personal Data may be transferred to or accessed from a third country for the purposes of the provision of the services outsourced or if required by law. In such case, the Company shall ensure that the relevant safeguards as mentioned in section 6 above will apply.

The Company ensures contractually that the cloud service provider will apply principles of data minimization and will not use or otherwise process your Personal Data for (a) user profiling, (b) advertising or similar commercial purposes, or (c) market research aimed at creating new

functionalities, services, or products or (d) any other purpose unless such use or Processing is in accordance with Company's documented instructions.

In the case where special categories of Personal Data (Personal Data consisting of racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, or data concerning a natural person's sex life or sexual orientation) will be transferred on a cloud, the Company will notify the Commissioner for Personal Data Protection prior to such transfer if required by the applicable regulatory framework i.e. when the cloud service provider transfers the special categories of Personal Data to a third country.

Retention of Personal Data on the cloud shall be in line with the general retention policy of the Company as described in section 9 below.

You may still exercise your rights as disclosed in section 9 below in relation to this Processing activity.

8. For how long your Personal Data is retained by the Company

(a) Existing relationships

The Company processes and stores your Personal Data as long as you are a customer of Company and/or you maintain any type of relationship with the Company and such Processing is necessary for the performance of the Company's contractual obligations, including the period prior to the conclusion of the contract with you (i.e., pre-contractual arrangements) and other legal obligations.

(b) Terminated relationships

After you stop being a customer of the Company or you stop maintaining any type of relationship with the Company, the Company may keep your Personal Data for a period of up to 6 (six) years from the date of termination for the following reasons:

- To maintain records according to rules that apply to the Company such as under applicable tax, banking and money laundering laws and regulations.
- To respond to any questions or complaints.
- To demonstrate if needed that the Company treated you fairly.
- To preserve evidence that may be needed for the establishment, exercise or defense of legal claims.

It is clarified that if the Company holds your Personal Data because you are related to a customer of the Company (e.g., you are a representative, beneficial owner, officer, or guarantor), the Company may keep your Personal Data for any of the above reasons for up to 6 (six) years after the end of the relationship of the Company with the relevant customer.

We may keep your Personal Data for longer than the said period:

- If we cannot delete it for legal and/or regulatory and/or technical reasons. If we do so, we will ensure that your privacy is protected, and the Personal Data is used only for the purposes stated in paragraph 4 above. For example, by the expiration of the above period, there are on-

going judicial proceedings with the Company concerning you directly or indirectly. In such a case the above period for the retention of Personal Data will be extended until a final judicial decision is issued.

- For research or statistical purposes. If we do so, the Company will make sure that your privacy is protected, and your Personal Data is processed only for research or statistical purposes.

(c) Prospect Customers

In case you provide us with Personal Data for the purposes of becoming a customer of Company but for any reason whatsoever you do not become a customer, we shall keep your personal information for a period of up to 6 (six) months from the date of notification of the rejection of your application for access to the Company's products and services, or from the date of withdrawal of such application, in accordance with directives/guidelines issued by the Cyprus Commissioner for the Protection of Personal Data.

(d) Other provisions

In all respects, where a shorter or longer time period for the retention of Personal Data is provided for by law or regulatory acts, the retention period mentioned above will be reduced or increased accordingly.

9. Consequences for refusal to provide your Personal Data

Kindly note that if you do not provide us with the Personal Data which is legitimately required, then we will not be allowed / or be able to commence or continue our business relationship with you or another relevant person.

10. Your Rights

Your data protection rights, granted by the GDPR, are described below. You may exercise them at any time in any of the following ways:

- through the Company's online customer support services; or
- via e-mail or mail.

(e) Right of access to your Personal Data

You have the right to obtain from the Company confirmation as to whether or not your Personal Data is being processed and/or obtain access to your Personal Data held by the Company.

(f) Right to rectification of Personal Data

You have the right to question any Personal Data the Company holds about you that you think is wrong or incomplete. If you do, the Company will take reasonable steps to check its accuracy and correct it.

(g) Right to erasure ("right to be forgotten")

You have the right to have the Company delete or remove your Personal Data in the following circumstances:

- The processing of Personal Data by the Company is no longer necessary for any of the reasons the Personal Data was collected and used.
- You have withdrawn your consent and there is no other reason for Personal Data Processing.
- You have successfully objected to the processing of Personal Data by the Company.
- Personal Data has been unlawfully processed.
- Deletion is required by law.

It is clarified that the Company reserves its right to deny the said erasure if the processing is necessary for the Company to comply with its legal obligation, for reasons of public interest, and/or for the exercise of its legal claims.

(h) Right to restriction of processing of your Personal Data

You also have the right to restrict the Company's use of your Personal Data in the following circumstances:

- pending verification by the Company of Personal Data the accuracy of which you have contested
- the Processing is unlawful, but you do not want your Personal Data to be erased
- the Company no longer needs the Personal Data, but you do not want it to be erased because you need it for the establishment, exercise or defense of legal claims
- pending the Company's assessment where you have objected to processing intended to safeguard the Company's legitimate interests.

(i) Right to data portability

You have the right to receive your Personal Data from the Company in a structured, commonly used and machine-readable form. You can also ask the Company to transfer your Personal Data in this format to other organizations, where this is technically feasible. This right relates to the Personal Data which you have provided to the Company and which the Company processes electronically in reliance on your consent or for fulfilling the contract between you and the Company.

(j) Right to object

You have the right to object to the Company's use of your Personal Data and ask the Company to stop using your Personal Data in any of the following circumstances:

- You have the right to object, on grounds relating to your particular situation, at any time to Processing of your Personal Data which is intended by the Company to safeguard its legitimate interests or to serve the public interest. If you lodge an objection, the Company will no longer process your Personal Data unless the Company can demonstrate compelling legitimate grounds for the Processing which override your interests, rights and freedoms or unless the Processing is for the establishment, exercise or defense of legal claims.

- You have the right to object to the Processing of your Personal Data for direct marketing purposes, including profiling. If you lodge such an objection, your Personal Data will no longer be processed for such purposes.
- You have the right to object to the Processing of your Personal Data for scientific or historical research purposes or statistical purposes, on grounds relating to your particular situation, unless the Processing is necessary for the performance of a task carried out for reasons of public interest.

(k) Right to withdraw your consent

Where the Company relies on your consent for the Processing of your Personal Data, you can withdraw your consent at any time. If you withdraw your consent, the Company may not be able to provide certain products or services to you. If this is so, the Company will tell you before giving effect to your withdrawal notification.

Please note that the withdrawal of the consent does not affect the legality of the Personal Data processed prior to the withdrawal.

11. Filing a complaint

If you are unhappy with how the Company processes your Personal Data, please inform the Company in any of the following ways:

- by contacting the Company at dpo@viverno.com

You also have the right to complain to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus. You can find information regarding the filing of complaints on the relevant website (<http://www.dataprotection.gov.cy>).

12. Changes / Amendments to the Privacy Notice

This Privacy Notice sets out the information that the Company must provide to you for the purposes of the GDPR. Any information in relation to the processing of Personal Data that is included in any of the Company's existing circulars, manuals, and associated forms on matters which are covered by this Privacy Notice is deemed to be superseded by the information in this Privacy Notice.

The Company may revise or update this Privacy Notice from time to time. The new version of this Privacy Notice will be available on the Company's website.

In case of significant changes (such as in relation to the reasons for which the Company uses Personal Data or to the way in which you may exercise the rights described above), the Company will bring these changes to your attention.

APPENDIX A

A. General Description - What are Cookies?

'Cookies' are small text files stored in your web browser that enable websites to recognize your computer when you visit a website. Cookies are essential to keep certain parts of a website functioning correctly and securely. They are also being used to make things quicker, easier and more personal to you and to help a website operator understand how the website is being used. They can also be used to present you with more tailored advertising content.

To do all these things, cookies collect some personal information about you whenever you use a website. You can choose whether to accept or reject some or all types of cookies and control this through your device's browser settings. Websites show a cookie banner when you visit a site, to make you aware of the cookies that are in use. If you then continue to use a website without adjusting your browser settings, the site will use cookies as set out in the sections below, to help you make an informed choice. It is important to know why websites use the different types of cookies and what that means for your online experience. This section provides you with a summary of the main points and tells you how switching off the different types of cookies will affect your experience on our website. They also enable online companies to find out which advertisement took you to a particular website.

B. The Cookie Categories

The Cookies fall in general into the following categories:

- **Strictly Necessary**

These types of cookies allow you to navigate the website and use essential features like secure areas and online registration. These cookies do not gather any information about you that could be used for marketing or remembering where you have been on the internet. These cookies are essential in our being able to guarantee the performance of our website, should you disable them we will not be able to ensure your security or predict how our website will perform during your visit.

- **Performance**

These types of cookies collect information about how you use our website e.g., which pages you visit, and if you experience any errors. The information collected is anonymous and is only used to help us improve how our website works, gauge what interests our users and assess the effectiveness of advertising.

- **Functionality**

This type of cookies remembers your preferences for tools found on our website, so you don't have to re-set them each time you visit. Some of them are managed by third parties. They may for instance determine whether you see the latest or oldest comments made in relation to an

article first. They may also help us greet you by name or remember your choice of language or region).

- **Targeting/Tracking**

These cookies are used to analyze what advertising might be most relevant to a user of the website based on the areas of the website that the user visits.

Important Note: From the categories above, Viverno uses only strictly necessary cookies to adjust the language of the website according to the users' location, and it does not use any other cookies to collect the users' personal data.

C. Controlling my Cookies

All modern browsers allow you to see what cookies you have, and to clear them individually or in their entirety by changing your cookie settings. Cookie settings are typically found in the 'options' or 'preferences' menu of your browser, otherwise you should use the 'Help' option in your browser for more details. You may also find the links below helpful:

- [Cookie settings in Chrome](#)
- [Cookie settings in Firefox](#)
- [Cookie settings in Microsoft Edge](#)
- [Cookie settings in Safari](#)

You can block cookies by activating the settings on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. We endeavor to make all parts of our site accessible to everyone but if you block some cookies, particularly Strictly Necessary cookies, your access might be impaired. Unless you have adjusted your browser settings so that it will refuse cookies, our system will issue cookies as soon you visit our site.