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Privacy Policy.

Your data, handled with the same care we bring to your assets.

NEXTURY / AM
ASSET MANAGEMENT

UAB “Nextury Asset Management”
Investment Management

V I L N I U S • 2 3 O C T O B E R 2 0 2 0

Approved by resolution of the Board

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I. GENERAL PROVISIONS

1. This document (hereinafter – the “**Privacy Policy**”) sets out the principal terms and procedures applied by UAB “Nextury Asset Management” (data registered in the Register of Legal Entities of the Republic of Lithuania, legal entity code – 304045309, registered office address – Gedimino pr. 20-35, LT-01102 Vilnius, Lithuania, e-mail – info@nextury.am) (hereinafter – the “**Company**”) for the collection, processing and storage of your Personal Data when using the Company’s website <https://nextury.am/> (hereinafter – the “**Website**”).
2. The Privacy Policy is intended to inform you about the conditions under which Personal Data is processed by the Company. The Privacy Policy also applies to Accounts on the Website.
3. The Privacy Policy may be reviewed and printed at any time on the Website. You will be notified of any future changes and/or amendments to the Privacy Policy by publishing the new version of the Privacy Policy on the Website.
4. The Website may contain links to websites of other persons, companies or organisations. The Company emphasises that it is not responsible for the content of such websites and/or the methods they use to ensure their privacy policy; therefore, before submitting any information about yourself you should review the rules, privacy policy and other documents of the relevant website.
5. When processing Personal Data, the Company complies with the Regulation, the Law on the Legal Protection of Personal Data of the Republic of Lithuania, the Law on Electronic Communications of the Republic of Lithuania and other directly applicable legal acts governing the protection of Personal Data, as well as with the instructions and recommendations of the competent authorities.

II. DEFINITIONS

6. **Personal Data** – any information relating to a natural person – the data subject – whose identity is known or can be directly or indirectly established by reference to such data.
7. **Data Recipient** – a legal or natural person to whom personal data about you is disclosed, including companies related to the Company (parent and subsidiary companies) and partners with whom the Company cooperates in order to enable you to use the Website.
8. **Data Controller** – the Company.
9. **IP Address** – a unique number assigned to every computer connected to the internet, known as the Internet Protocol (IP) address. As these numbers are usually allocated in country-based blocks, an IP address can often be used to identify the country from which a computer connects to the internet.
10. **Browser** – software that enables access to websites on the World Wide Web from a personal computer, phone or other device.

- 11. Login Data** – the Internet Protocol (IP) address and the internet service provider used to connect the device to the internet, browser type and version, time zone settings, browser plug-in type and version, operating system and platform, location of connection, character encoding, and the full Uniform Resource Locator (URL).
- 12. Regulation** – 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).
- 13. Cookies** – small files uploaded to your computer, phone, tablet or other device used while you visit the Website, which enable the Website to recognise your device. This term covers not only cookies but also the use of similar technologies (e.g., Flash cookies).
- 14. Direct Marketing** – all activities that allow the Company to offer services or to convey any other communications to you by mail, telephone or other direct means, in order to inform you or to obtain a response, as well as all related services.
- 15. Rules** – the Company’s personal data processing rules, together with all annexes forming part thereof.
- 16. Processing** – any operation performed on your data (including collection, recording, storage, modification, granting of access, submission of queries, transfer, etc.).

III. PRINCIPLES OF PERSONAL DATA PROCESSING

- 17.** In its activities, the Company is guided by the following key principles for the processing of Personal Data:
 - 17.1.** Personal Data is collected for specified and legitimate purposes;
 - 17.2.** Personal Data is processed accurately and in good faith;
 - 17.3.** Personal Data is processed lawfully, i.e. only where:
 - 17.3.1.** the data subject has given consent;
 - 17.3.2.** a contract is concluded or performed where one of the parties is the data subject;
 - 17.3.3.** the Company is required by law to process Personal Data;
 - 17.3.4.** Personal Data must be processed for the purposes of the legitimate interests pursued by the Company or by a third party to whom the personal data is provided, where the data subject’s interests do not override those interests.
 - 17.4.** Personal Data is kept up to date;
 - 17.5.** Personal Data is stored no longer than is necessary for the purposes for which it is processed;

- 17.6. Personal Data is processed only by those employees who have been granted the relevant right;
- 17.7. all information about processed Personal Data is confidential.

IV. NATURE OF INFORMATION COLLECTED

- 18. The Company may collect and process the following Personal Data:
 - 18.1. **Basic information:** name, surname, personal identification number, date of birth, address (registered office), telephone number, e-mail address, signature;
 - 18.2. **Information about services provided and investments made:** information about the services provided and investments made and the duration of their use, information regarding compliance with regulatory requirements;
 - 18.3. **Information about consent to direct marketing:** information about your consent or refusal to receive promotional information (news, programme offers, campaigns, invitations to events, etc.), to participate in opinion surveys, to permit the use of your data, and to allow your data to be transferred to third parties. Direct marketing offers will be sent to persons under 14 years of age only with the consent of their parents or other lawful guardians;
 - 18.4. **Communication and service information:** data on browsing of the Company's websites and self-service portals (collected using cookies and similar technologies); information from correspondence with the Company (via self-service, e-mail, dedicated applications, etc.), your enquiries and the Company's replies on matters to be resolved;
 - 18.5. **Other data:** data collected from other lawful sources that do not fall within the categories listed above (information about survey participants).

V. PURPOSES OF DATA PROCESSING

- 19. The Company respects your right to privacy. The Company uses the data it collects in order to provide its services and carry out its activities, as well as to provide assistance, send notifications, offers and information, and to protect the rights and interests of the Company and third parties. The purposes of information processing are:
 - 19.1. to conclude and perform contracts (provision of services), ensure their quality, and provide service and information;
 - 19.2. for direct marketing and general information about services (unless you have unsubscribed from such notifications);
 - 19.3. for accounting purposes;
 - 19.4. to fulfil legal obligations, for example in connection with the prevention of money laundering, investor verification, etc.;

- 19.5. to administer and improve the Company's Website, to keep it secure, and to ensure that content is delivered to your device in the most effective manner;
- 19.6. to comply with legal obligations laid down in legislation;
- 19.7. for any other purposes for which the Company is entitled to process Personal Data, where the Company has obtained the data subject's consent, where the Company must process Personal Data on the basis of the Company's legitimate interest, or where the Company is required to process the data by applicable legislation.

VI. METHODS OF DATA COLLECTION

- 20. Information about you is obtained and collected in the following ways:
 - 20.1. you provide information to the Company yourself (e.g., by completing the Company's applications (online or in paper form), investor questionnaires, contracts and/or other documents, electronically on our Website, by submitting enquiries by post, e-mail, telephone, or by other means of communication), where the provision of such information is required by law or where you provide it voluntarily;
 - 20.2. automatically when you use the Company's website – your Login Data is recorded in this way. Most of the information collected automatically is collected via cookies and other similar technologies (for further details, see Section X of the Privacy Policy);
 - 20.3. based on your consent, the Company may obtain information about you from third parties such as Google, Inc.

VII. DURATION OF DATA PROCESSING

- 21. The Company processes Personal Data only for as long as is necessary to achieve the Company's purposes, while complying with the data retention periods set out in the laws of the Republic of Lithuania.
- 22. Where the laws of the Republic of Lithuania do not specify a retention period for documents or other information being processed, the Company processes Personal Data only for as long as is required to achieve and implement the purposes set out in this Privacy Policy, taking into account the legal basis for the storage of the Personal Data, the legitimate purpose, and the principles of Personal Data processing. Once the retention period for Personal Data expires, the data is destroyed in accordance with the procedure laid down by law.

VIII. TRANSFER OF DATA

- 23. When providing services and carrying out its activities, the Company may, in certain cases, need to transfer Personal Data to third parties.
- 24. The Company also uses third-party services in order to ensure the functional capabilities of the services it provides and of the Website. The transfer of Personal Data to such data processors

that provide services to the Company is limited to the minimum scope necessary to ensure the provision of the third-party services.

- 25.** In order to achieve the purposes set out in the Privacy Policy, the Company may transfer your data to the following data recipients:
- 25.1.** data processors that provide services and process Personal Data on behalf of, in the interest of and at the request of the Company (e.g., IT service providers, etc.). Data processors process Personal Data only in accordance with clearly given instructions, undertaking to ensure appropriate protection, confidentiality and organisational and technical measures meeting the security requirements for the Personal Data received from the Company for processing, as is set out in more detail in the contracts concluded between the Company and the data processors (or sub-processors – with the Company’s consent) on data processing;
 - 25.2.** other data controllers that provide services to the Company and process your data in their own name, determining the principles of personal data processing, the appropriate technical and administrative measures, the storage and destruction periods, and ensuring the confidentiality of your personal data;
 - 25.3. entities entitled to receive information under legal requirements** (e.g., courts, state and municipal authorities, etc.), only to the extent necessary to ensure proper compliance with the applicable laws;
 - 25.4.** other third parties on another lawful basis or with your consent, which may be obtained on a case-by-case basis.
- 26.** The data processors to which the Company transfers your personal data may be established outside the Republic of Lithuania, the European Union or the European Economic Area. Data is transferred to such processors only where this is permitted under applicable law and only after taking all necessary measures to ensure the protection of your privacy.

IX. WHAT RIGHTS DO YOU HAVE?

- 27.** You have the following rights:
- 27.1.** to contact us and discuss any questions arising in connection with the Company’s processing of Personal Data;
 - 27.2.** to obtain confirmation from the Company as to whether Personal Data relating to you is being processed and, where such Personal Data is being processed, to access the Personal Data being processed and the related information;
 - 27.3.** to receive the Personal Data you have yourself provided, which is processed on the basis of your consent or for the performance of a contract, in writing or in a commonly used electronic form and, where possible, to request that such data be transferred to another service provider;

- 27.4.** to require that your Personal Data be rectified where the data is incorrect, inaccurate, or to have incomplete data supplemented;
 - 27.5.** to require the erasure of your Personal Data, as a client of the Company, that is processed on the basis of your consent, where you withdraw the relevant consent. This right does not apply where the Personal Data whose erasure is requested is also processed on another legal basis, such as where processing is necessary for the performance of a contract or for compliance with an obligation under applicable law;
 - 27.6.** to require the restriction of the processing of your Personal Data, e.g., for the period during which the Company analyses whether you are entitled to request, and whether it is practically feasible, the erasure of your Personal Data;
 - 27.7.** to object to the processing of your Personal Data carried out for the legitimate interests of the Company or third parties, where the basis for processing is legitimate interests, except where there are legitimate grounds for such processing or where it is necessary for the establishment, exercise or defence of legal claims;
 - 27.8.** to object to the processing of your Personal Data for direct marketing purposes, including profiling carried out for that purpose;
 - 27.9.** to object to being subject to a decision based solely on automated processing, including profiling, where such decision-making produces legal effects on you or similarly significantly affects you. This right does not apply where such decision-making is necessary for the conclusion or performance of a contract with you, is permitted by applicable law, or where you have given your explicit consent thereto;
 - 27.10.** to withdraw your consent to the processing of Personal Data.
- 28.** You may exercise your rights by submitting a specific request to the contacts indicated in this Privacy Policy. Information related to the exercise of your rights is provided free of charge. The Company shall, no later than within 1 month from receipt of the request, provide information on the action taken in response to the request to exercise your rights, or shall state the reasons for inaction.
 - 29.** The period for providing the requested information may, where necessary, be extended by a further 2 months, taking into account the complexity and the number of requests. Where the request is submitted by electronic means, the information shall also be provided to you by electronic means.
 - 30.** Consideration of a received request relating to the exercise of rights may be refused, or a fee may be charged for it, where the request is manifestly unfounded or excessive, as well as in other cases provided for in legislation.
 - 31.** If you believe that your Personal Data is being processed in breach of your rights and legitimate interests under applicable laws, you have the right to lodge a complaint regarding the processing of Personal Data with the State Data Protection Inspectorate (<https://vdai.lrv.lt/>).

32. Before submitting an official complaint, the Company recommends contacting the Company first (info@nextury.am) to find an appropriate solution to the issue.

X. USE OF COOKIES ON THE WEBSITE

33. In order to improve the quality of your visit to the Website, the Company may use cookies on the Website – small pieces of text information that are automatically created when browsing the website and stored on the visitor’s computer or other end device. Cookies make it possible to recognise that you have previously visited the Website, help to collect statistical data on Website visitor traffic, and enable the user to navigate the Website more conveniently. The Company processes anonymised Personal Data with the help of cookies.
34. Cookies are divided into mandatory and optional. Mandatory cookies are necessary for browsing and using the Website and its functions. Without mandatory cookies, certain pages of the Website could not be served, and the Website would not function as smoothly as it should. Mandatory cookies do not collect any information for marketing purposes and do not record where you have visited on the Website.
35. Optional cookies allow the use of the Website to be tailored to your needs. Such cookies are used to remember your choices regarding language, country or other browser preferences and to provide personalised or enhanced selected functions, so that you do not have to enter all this information again on your next visit to the Website. Optional cookies provide the Company with information about how often you visit the Website, how much time you spend on it, and how often the Website’s functions are used. This allows the Company to improve the Website’s structure and navigation so that the user experience is as convenient as possible.
36. Cookies are used unless you object. You may change your internet browser settings and disable all cookies, delete them all, or enable/disable them individually so that Google cookies are not stored on your computer or other end device. However, please note that in such case some functions of the Website may not work as intended. More information about the Google cookies used on the Website, including information about the use and removal of cookies, can be found at www.allaboutcookies.org.

XI. UPDATING OF PERSONAL DATA

37. The Company ensures the accuracy and currency of your Personal Data and therefore kindly asks you to inform the Company of any anticipated changes relating to the Personal Data of yours that the Company processes.

XII. CONTACT DETAILS

38. We kindly ask you to contact us with any questions, requests or comments regarding the Company’s Privacy Policy or its data processing using the contact details below:

E-MAIL	info@nextury.am
CONTACT PERSON	Director — Valdas Grigonis
TELEPHONE	+370 621 26 443
ADDRESS	Gedimino pr. 20-35, LT-01102 Vilnius, Lithuania

XIII. FINAL PROVISIONS

- 39.** This Privacy Policy is effective as from the date of its publication on the Website. You will always be informed of any changes and/or amendments to the Privacy Policy, which the Company is entitled to make at any time, on the Website and/or by e-mail.