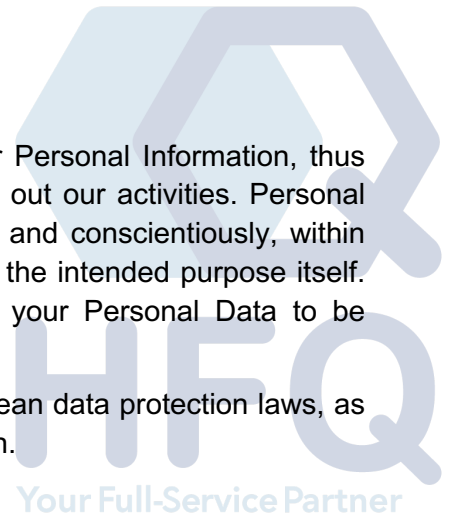


## PRIVACY POLICY

1. We perceive the importance pertaining to the safety of your Personal Information, thus collecting and handling the information only necessary to carry out our activities. Personal Information is handled with applicable legal acts, transparently and conscientiously, within advance established purpose, only in scope needed to achieve the intended purpose itself. While handling your Personal Information we are striving for your Personal Data to be accurate, secure, confidential, properly kept and stored.
2. While handling your Personal Information we obey the European data protection laws, as well as legislation requirements on handling Personal Information.



### A. What is this document?

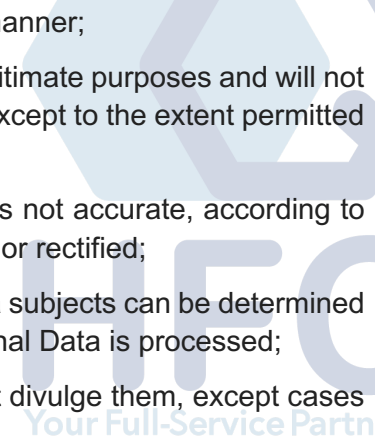
3. This privacy policy (further – Privacy Policy) determines privacy terms while you use the website [https:// hfqfundmanagement.com](https://hfqfundmanagement.com) (further – Website).
4. Carefully read this Privacy Policy to be able to understand the policies and practices while we handle your Personal Data. While confirming the Privacy Policy, you distinctly agree, that we will collect your Personal Data, handle and process it as specified in this document.
5. Term Personal Data used in this Privacy Policy describes any kind of information that will help to recognize you, directly or indirectly determine your identity. Term Personal Data represents your name, surname, date of birth, e-mail or postal address, location information and internet identifier, as well as your characteristics and etc.
6. Other terms unspecified in the Privacy Policy, yet, written with a capital letter indication has the same meaning as they do in the Buy – Sell agreement on the Website (further – Agreement).
7. After reading this document you will find out, how we are handling your Personal Data, how it is collected as well as what are your rights as Personal Data subjects.
8. Privacy Policy is valid all parties visiting the Website, as well as for actions you can take at the Website, including the registration and subscription of the commodities. **Use of the Website identifies you reading and agreeing to this Privacy Policy and the purpose, methods, and procedures for using your Personal Data as specified therein. If you do not agree to the Privacy Policy, you are not authorized for the use of the Website.**

### B. Who are we?

9. The Website is handled and administrated by HFQ Fund Management.
10. In accordance with the provisions of the European data protection legal acts, we are possessors of your Personal Data.

### C. What principles do we use?

11. When Managing your personal data we:
  - a) Comply with applicable and valid legislation;

- 
- b) Process your Personal Data in a lawful, fair and transparent manner;
  - c) Collect your Personal data for specified, clearly defined and legitimate purposes and will not continue to operate in a way incompatible with those purposes, except to the extent permitted by law;
  - d) Take all reasonable steps to ensure that Personal Data that is not accurate, according to the purposes for which they are collected, is immediately erased or rectified;
  - e) Handle the Personal Data in a form, that the identity of the data subjects can be determined for no longer than is necessary for the purposes for which Personal Data is processed;
  - f) Will not transfer your Personal Data to third parties and will not divulge them, except cases as provided in the Privacy Policy or in cases stipulated by law;
  - g) Ensure that your Personal Data is processed in such manner, that use of appropriate technical or organizational measures will ensure adequate security of your Personal Data, including protection against unauthorized or illegitimate processing, accidental loss, destruction or damage.

#### **D. Why do we manage your personal data?**

12. Your personal data will be managed by us for the following purposes:

- a) Seeking to conclude and enforce the Agreement with you;
- b) To improve the Website and provide you with better and customized services;
- c) With your consent – to provide you with premium goods and services offers through promotional campaigns (promotional games, quizzes, contests, etc.);
- d) For other purposes, when your Personal Data is required to be processed by law or legitimate interest.

#### **E. How do we collect and process your Personal Data?**

13. We process your Personal Data in the following ways:

- a) When you submit your Personal Data to us (for example, you register on the Website, e-mail or telephone);
- b) When you use the Website (for example, the computer address (IP), type of the web browser used, the number of visits, viewings of the Website, time spent on the Website and etc.)
- c) When your Personal Data is legally permitted or received from other persons in accordance with this Privacy Policy.

14. You provide Us with your Personal Data and other information by registering on the Website, by submitting documents, by writing to Us or Our customer service team, when ordering goods, paying for them, filling in the delivery information, by participating in a tender, a campaign or a survey or submitting your complaints regarding the Website or the product. When you contact us in writing or by e-mail, we will save your correspondence.

15. The information you provide may include your full name, address, postal code, e-mail address, your bank account details (including account number, bank code, and IBAN), credit or debit card data (including bank account number, bank code, IBAN), card number, expiration date and CVC security code), the address for the invoice and etc.

16. When you use the Website, certain non-personal information (such as the Computer address (IP), the type of the web browser used, the number of visits, viewings of the Website, time spent on the Website) is automatically collected. This information is used to improve the content, functionality, and attractiveness of the Website.

17. We may combine the Personal Data received from you with the data from our own collection from other public or accessible sources. For example, we may combine your personal data with data obtained through the use of the Website cookies or with data legally obtained from the third parties. By enforcing your rights, you will always be able to request correcting your Personal Data.

18. If you register on the Website, you may at any time remove your personal information from the Website by canceling your registration (i.e., your account). You can send an application for cancellation to an e-mail address provided on our website. The application must clearly indicate your full name and other registration details (if any). If we have any doubts about your identity, we may ask you to provide proof of identity. You can cancel your registration on the Website in your account. After removing your registration (account), we will immediately, no later than 30 calendar days, terminate your Personal Data processing activities, except for the cases specified in this Privacy Policy and legal acts.

#### **F. Do we use your Personal Data for direct marketing purposes?**

19. We may use your Personal Data to inform you about our goods and services that we believe may be of interest to you. However, we will only use your Personal Data for this purpose in addition to your consent.

20. By granting the right to process your Personal Data for direct marketing purposes, you also grant a permission to contact you by e-mail, phone, short messages (SMS), as well as by other means of communication (e.g., Skype, Viber, etc.) for the same purposes. We may combine available information about you with the information available to third parties in order to provide you with proposals

21. If you give your consent to use your Personal Data for direct marketing purposes, we may use your Personal Data to analyze and improve the effectiveness of our Website, advertising and market research, as well as other marketing and sales goals. In this case, we will use your impersonal Personal Data.

22. Even if you have given your consent to the processing of your Personal Data for direct marketing purposes, you may at any time easily cancel this consent for all or part of the processing of Personal Data. To do this, you can:

- a) Modify the setting in your account in the Website stating that you no longer want your Personal Data to be used for direct marketing purposes; or
- b) Notify the refusal in the manner indicated in the notices and/ or offers received (for example, by clicking on the unsubscribe button in the newsletter, etc.); or

c) Sending us a request by e-mail. The application must clearly indicate your full name and other registration details (if any). If you desire to cancel your consent in this way, we may ask you to provide proof of identity, as well as any additional information related to the request.

23. We will endeavor to terminate your Personal Data processing for direct marketing purposes as soon as possible, no later than within 5 (five) business days of your request.

24. The cancellation of the agreement does not automatically oblige us to destroy your Personal Data or provide you with information about your Personal Data. For these actions, we require you to specify such a request separately.

## **G. How do we use cookies?**

25. We collect information about you using cookies and similar technologies. Cookies are small files that are temporarily stored on your device's hard drive and allows to recognize you during other visits to the Website to save your Personal browsing history, options, customize content, speed up Website searches, create a comfortable and friendly Website and deliver it more efficiently and reliably. Cookies are common practice on web browsing, which makes it easy to use the Website.

26. With cookies, we can collect the following information: IP address, browser type, demographic data, and, if the user came to the Website from a third-party web page, the link URL of the page.

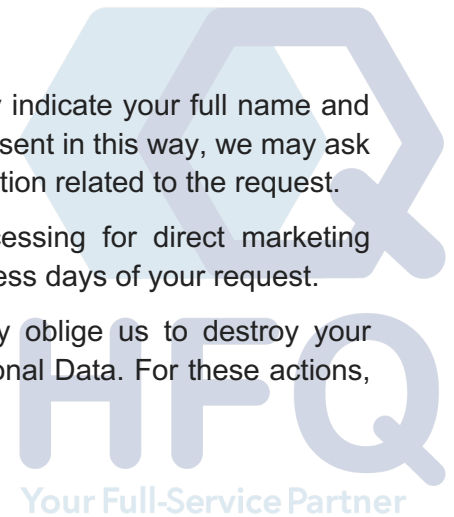
27. We use cookies information for the following purposes:

- a) so that upon your re-visit of the Website, we will recognize you and we may direct you to your account;
- b) to ensure the functionality of the Website (for example, to enable you to use the Website's personalization);
- c) We can improve and develop the Website so that it can even better meet your needs;
- d) The development of the services and the use of the Website analysis;
- e) Target marketing orientation.

28. We may, without violating the law, combine information obtained through the use of cookies with information received on the person by other means, for example information on the use of the Website, Personal Data submitted by you.

29. The Website may use the following cookies:

- a) Technical cookies – cookies necessary for the Website to function;
- b) Functional cookies – cookies, not essential for Website to function, significantly improving the performance, quality and customer experience;
- c) Analytical cookies – cookies used for preparing the statistical analysis of the Website visitors' navigation methods; the data collected by these cookies is used anonymously;
- d) Target or promotional cookies – cookies, used to display the Services or other information that might be of interest to you;
- e) Social networking cookies – cookies, that are required to be used if you want to use Website's information on your Social Profile account.



30. All information about the cookies used on the Website, their purpose, validity and the data used are given in the table.

| Cookie                | The purpose of data management   | Necessity  | The moment of creation                  | The period of validity              | The data used   | Additional information   |
|-----------------------|--|--|---|-------------------------------------|---|--|
| PHPSESSID             | The Cookie is designed to realize the functionality of the Site.   | Session Cookie. Required.  | First entering the Site.                | Until the browser window is closed. | Stores the User's session – a unique identifier.          |  |
| _icl_current_language |  | Required.  | First entering the Site.                | 1 day from creation/update.         | Stores the current language of the site.                  |  |
| wpml_referer_url      |  | Required.  | First entering the Site.                | 1 day from creation/update          | Stores the last requested URL on the front-end.           |  |
| current_continent     |  | Required.  | First entering the Site.                | 1 year.                             | Stores the current region of the site.                    |  |
| displayCookieConsent  | These cookies are being used to determine whether the user agrees to the use of cookies.                 | Required.  | With the consent of the use of cookies. | 1 year.                             | It determines the user's agreement on the use of cookies. |  |
| _utma                 | These Cookies are used to collect the statistical information about the Site traffic. The resulting data | Tracking Cookies. Optional, without these Cookies system would work. | Entering the Site.                      | 2 years from creation/update.       | Determines which domain to measure.                       | Google Analytics – Cookies are used to collect information about how visitors use the Site. This |
| _utmb                 |  |  |   | 30 minutes from creation/update.    | Determines new sessions/visits.                           |  |

|             |   |   |  |                                     |   |  |
|-------------|---|---|--|-------------------------------------|---|--|
| _utmc       | is used to prepare the reports and to improve the Site. | However, these Cookies are recommended. |  | Until the browser window is closed. | Sets for interoperability with urchin.js.                                   | uses the system developed by Google that is used on the majority of websites. Important – Google Analytics does not store any personal information about the Site Users. |
| _utmt       |   |   |  | 10 minutes.                         | Throttles request rate.   |  |
| _utmz       |   |   |  | 6 months from creation/update.      | Stores the traffic or campaign that explains how the User reached the Site. |  |
| _ga         |   |   |  | 2 years.                            | Distinguishes Users.  |  |
| _gat        |   |   |  | 10 minutes.                         | Throttles request rate.   |  |
| _ym_visitor |   |   |  | Until the browser window is closed. | Protects character “w”, it is not personal information.                     | Yandex Metrika – Cookies are used to collect information about how visitors use the Site.  |
| _ym_uid     |   |   |  | 2 years from creation/update.       | Distinguishes Users.  |  |
| _ym_isad    |   |   |  | 1 year.                             | Determines which domain to measure.   |  |

31. You can give your consent to use cookies in the following ways:

- a) Without deleting them and/or not changing your internet browser settings so that they do not accept cookies;
- b) Click on the „Accept“ tag on the link (bar) of the cookie on the Website;

c) Expressing consent at the time of registration on the Website.

32. The consent for the use of cookies is valid for 1 (one) year from the date it is given.

33. You may at any time cancel the authorization to use cookies given to us. You can do this by changing your Internet browser setting so that it does not accept cookies. How to do this depends on your operating system and the Internet browser. For detailed information on cookies, their use, opt-outs, visit:

<http://AllAboutCookies.org> or [http://google.com/privacy\\_ads.html](http://google.com/privacy_ads.html).

34. In some cases, in particular, the deactivation of technical and functional cookies, the discrepancy or deletion of cookies may slow down the speed of browsing the Internet, restrict the functionality of certain Website functions, and block access to the Website.

#### **H. Whom do we provide your Personal Data to?**

35. We guarantee that your personal data will not be sold, provided or otherwise legally transferred to third parties, and used for purposes other than those collected. We will not transfer your personal data in any other way, except in accordance with this Privacy Policy and Legal Acts. However, we reserve the right to provide information about you if we are required to do so in accordance with the law or if we are required by law enforcement agencies or prosecution authorities.

36. We may transfer your personal data to companies that help us to carry out our business (for example, to issue financial documents, to collect or administer your payments, to deliver goods to you, etc.), as well as direct marketing (such as sending newsletters, organizing games, etc.). From such partners, we require your data to be processed only in accordance with our instructions and valid data protection laws.

37. We may disclose the following data about you to the following third parties:

a) third-party providers, such as couriers, banking partners, technical service providers, payment card publishers and payment service providers, so that we can ensure the performance of our agreements with you and our service providers;

b) third-party service providers whose services are normally used for payment processing, data storage, telecommunications and website hosting purposes;

c) financial institutions processing your credit or debit card details. For example, if you instruct to make a payment on your behalf, we will transfer personal information to third parties in order to process the payment. By your order to make a payment to an institution that is not within the territory of the European Union (EU), data may be transferred to a country that does not provide the same level of security; By giving such an order, you confirm that you agree to such transfer of data.

#### **I. How long do we keep your Personal Data?**

38. We protect your Personal Data for no longer than what the purposes for which the data was collected, or provided by law if it provides a longer term of storage of data.



39. Except as stated above, we will keep your Personal Data (including data collected for direct marketing purposes, as well as in-person correspondence) for no longer than 2 years from your last login or after you have signed out from the Website.

40. Your Personal Data, which we have collected or processed in order to conclude and enforce the Agreement with you, will be kept for the validity of the contract and another 10 years after it expires.

41. We strive not to keep your out-of-date, non-relevant Personal Data, so updating them (for example, adjusting your account, changing your information, etc.) only holds up-to-date information. Historical information is protected if necessary in accordance with the legal acts or for the performance of our activities.

#### **J. How do we protect your Personal Data?**

42. The data we collect from you will be stored in the EU, but may also be transferred or stored outside the EU. It can also be handled by our or our supplier personnel working outside the EU. By transmitting your data outside the EU, we will take all necessary steps to ensure that your data is processed securely and in compliance with this Privacy Policy.

43. Unfortunately, the transmission of information on the Internet is not completely secure. Although we are very keen to protect your personal data, we can not guarantee the security of the data when they are transferred to the Website - you have to assume the risks associated with data transfer. When we receive your data, we will apply strict procedures and security measures to protect your data against unauthorized access.

44. If there are unlikely circumstances and We will find out of any breach of your Personal Data, which is likely to constitute a serious threat to your rights or freedoms, will immediately inform you as soon as we know it and determine which information has been accessed.

#### **K. Third-party Websites:**

45. Occasionally, the Website may contain links to external sites - our business partner websites or websites promoting our products. By following such links to any of the websites, please note that these websites and the services available through them have their own separate privacy policies and we do not accept any liability or obligation for these policies or for the collection of Personal Data on these websites or services, contact or location data. Review these policies before submitting your personal information to these websites or using any services

#### **L. What right do you have?**

46. In processing your Personal Data, we guarantee your rights under the applicable European data protection law. As a personal data subject, you have the following rights:

- a) know (be informed) about the processing of your Personal Data;
- b) access your Personal Data that we handle;
- c) require correction or addition, correction of incorrect or inaccurate, incomplete Personal Data;



d) require the destruction of Personal Data when it is no longer necessary for the purposes for which it was collected;

e) require the destruction of Personal Data if they are processed illegally or when you cancel your consent to the processing of Personal Data or do not provide such consent, which is necessary;

f) to disagree with the processing of Personal Data or to cancel the previously given consent;

g) require the suspension of (but excluding) the processing of your Personal Data, in the event of disputes or the need to verify the legality of the processing, the accuracy of the data, as well as in cases where we no longer need your Personal Data, but you do not want us to destroy it;

h) request, if technically feasible, the provision of your Personal Data in an easily readable format for your consent or for the purpose of performing the contract, or request the transfer to another data controller.

47. We will endeavor to guarantee the exercise of your rights as a person of the data subject and to create all conditions for the effective exercise of these rights, but we reserve the right to fail to meet your requirements when necessary to ensure:

a) the fulfillment of legal obligations imposed on us;

b) State security or defense;

c) public order, prevention, investigation, detection or prosecution of criminal offenses;

d) important economic or financial interests of the State;

e) prevention, investigation and detection of breaches of official or professional ethics;

f) the protection of your rights or freedoms.

48. You can provide us with the requirements related to the implementation of your rights in person, by post or by electronic means of communication. Upon receipt of your request, we may ask you to provide proof of identity, as well as any additional information required by us for the request.

49. Upon receiving your request, we will reply to you within 30 calendar days upon receiving your claim and of the date of submission of all necessary documents for the submission of the response.

50. If we consider necessary, we will stop processing your data, except for storage, until your request is resolved. If you have legally withdraw your consent, we will immediately terminate your Personal Data processing activities immediately, but not later than within 30 calendar days, except for the cases specified in this Privacy Policy (see Section 7) and legal acts.

51. By refusing to comply with your claim, we will clearly indicate the grounds for such refusal.

52. If you disagree with our actions or the response to your appeal, you can complain to our competent state body about our actions and decisions.

### **M. Where can you submit a complaint?**

53. If you wish to file a complaint regarding the processing of our data, submit it in writing, with as much information as possible, using the contact details provided at the end of this policy. We will cooperate with you and we will work to resolve all issues immediately.

54. If you believe that your rights have been violated under the data protection law, you can file a complaint with our Supervisory Authority.

**N. How this privacy policy can change?**

55. All changes to our Privacy Policy will be posted on the Website; If necessary, you will be notified of them. The new Privacy Policy Terms may also be posted on the Website and you may need to read and accept them in order to continue to order the goods.

