

## Privacy Policy

I, the undersigned, hereby grant my explicit and informed consent for the processing of my personal data by New Venture Brokerage CJSC ("NVB") for the purposes outlined below. I acknowledge that I have read, understood, and agree to comply with the terms and conditions related to the processing of my personal data.

At NVB, safeguarding the privacy of Personal Information is of paramount importance. This commitment extends to individuals who may be clients, employees, agents, job applicants, or others associated with NVB, whether inside or outside the organization. To ensure the utmost protection of your privacy, we have implemented specific policies and practices outlined in this Privacy Policy ("Policy"). This Policy is expressly directed to individuals who furnish Personal Information to NVB or who visit and utilize NVB's websites, trading platforms, software applications, and social media sites. It also covers personal information related to representatives or contacts of legal entities interacting with NVB.

### **Personal Information that NVB collects**

In this privacy policy ("Policy"), the term "Personal Information" refers to information about an individual that is collected or maintained for business purposes and enables the identification of the individual. This encompasses, but is not limited to, information:

- a) furnished during the NVB account application process or while utilizing any of NVB's website applications (e.g., name, email address, telephone number, birth date, tax ID number, investment objectives, biometric information, etc.); or
- b) submitted when applying for employment opportunities with NVB (e.g., name, contact information, and additional details from your resume); or
- c) acquired as a result of transactions conducted through the NVB systems or in connection with services offered by NVB; or
- d) transaction information, including products or services purchased, obtained, or considered, or other purchasing or consuming histories; or
- e) business and financial information such as employment details, source of funds, bank account details, tax/financial statements, share ownership, etc.; or
- f) Information from other third-party sources (for example, to verify your identity and to better understand your product and service needs); or
- g) other sources with your consent or with the consent of your representative (for example, from other institutions if you transfer positions into NVB); or

h) collected through internet cookies.

This definition encompasses a wide range of information aimed at providing clarity about the scope of personal data covered under this Policy.

### **Purpose of use of Personal Information**

NVB may use your Personal Information for the following purposes:

- a) to provide services to you in accordance with agreement(s) you or your organization may have with NVB, for its own administrative, record-keeping and compliance procedures; or
- b) to provide you or the organization you represent with investment services, and/or to deal with your requests or inquiries; or
- c) to enforce agreements, protect our or others' property or rights, and defend against potential claims;
- d) to conduct recruitment processes (applies only to Personal Information submitted for employment applications); or
- e) to respond to your information requests and follow up to offer further assistance.
- f) to enter into or fulfill various contracts; or
- g) to conduct monitoring by NVB or authorized individuals using various methods; or
- h) for statistical purposes, market research, and product analysis, aiming to develop and enhance its products and services; or
- i) for preventing and detecting money laundering, terrorism, fraud, or other crimes and/or abuses of NVB's services.

### **Parties we share information with**

NVB may share your Personal Information with the entities listed below.

- a) Government agencies, regulatory bodies and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions);
- b) Organizations providing services in the areas of fraud and crime prevention and with organizations providing similar services, such as regulatory bodies;
- c) Consistent with applicable law, NVB may share your Personal Information with courts, law enforcement authorities, regulators or attorneys or other parties for the establishment, exercise or defense of a legal or equitable claim or for the purposes of a confidential alternative dispute resolution process;

d) Depositories, stock exchanges, clearing or settlement systems, account controllers or other participant in the relevant system, to counterparties, dealers, custodians, intermediaries and others where disclosure is reasonably intended for the purpose of effecting, managing or reporting transactions in connection with the provision of NVB's services or establishing a relationship with a view to such transactions;

e) Other service providers whose products, services and investment offerings are made available through NVB, and which you decide to utilize;

f) In addition, if you choose to use or indicate your interest in using a product, service or investment offering that is offered by a third party and made available through NVB, it may share personal information with that third party in connection with your use or interest of that product, service or investment offering.

g) If you conduct business with NVB through your investment professional, it may exchange information we collect with your investment professional or with others they may authorize.

Otherwise, NVB will only disclose your Personal Information when you direct NVB or give a permission to do so, when NVB is allowed or required by applicable law or judicial or official request to do so, or as required to investigate actual or suspected fraudulent or criminal activities. The parties involved are bound by an obligation to maintain the confidentiality of the Personal Information shared with them. They are authorized to use this information solely for the provision of services as specified by NVB, or in compliance with applicable laws and regulations. Under no circumstances will they disclose this information unless compelled by legal requirements. NVB does not bear responsibility for the policies governing the use of personal data transferred to other entities.

### **Security of Personal Information**

In compliance with legal requirements, NVB is committed to implementing suitable technical and organizational measures to maintain the confidentiality and security of your Personal Information. These measures align with NVB's internal procedures governing the storage, disclosure, and access to Personal Information. Your Personal Information may be securely stored on NVB's internal systems, those of its partners, or in paper files.

### **Personal Information Retention**

NVB maintains your Personal Information in an identifiable form, adhering to its internal policies that outline comprehensive standards and procedures governing the retention, handling, and disposal of such information. The duration of retention aligns with legal, regulatory, and business requirements, ensuring that information is kept for as long as necessary. In specific cases, retention periods may be extended, such as when it's required to preserve your Personal Information in connection with litigation, investigations, or proceedings.

## **Your rights**

You have the following rights in respect of personal information about you that NVB holds:

- (a) request NVB to give you access to the information,
- (b) request to correct it, update it or block it in cases provided under the Law of the Republic of Armenia “On Protection of Personal Data”,
- (c) request to erase (destruct) it in cases provided under the Law of the Republic of Armenia “On Protection of Personal Data”,
- (d) request to terminate processing of personal information in cases provided under the Law of the Republic of Armenia “On Protection of Personal Data”, and
- (e) request implementation of other actions required under the terms of this Privacy Policy and the Law of the Republic of Armenia “On Protection of Personal Data”.

## **Privacy Policy updates**

This Privacy Policy was last updated on the date specified at the top of this document. NVB retains the right to periodically update and modify this Policy, incorporating changes such as adjustments to how NVB processes your Personal Information or compliance with evolving legal requirements. Any such modifications will be promptly posted on NVB’s website or published through other means. The updated Privacy Policy becomes effective immediately upon its posting on NVB’s website ([www.nvbrokerage.com](http://www.nvbrokerage.com)).

## **Termination of your consent**

By accepting the terms of this Policy, you give NVB your consent to process your personal information pursuant to the terms described herein. Your consent on processing of your personal information shall be valid until you withdraw it.

You can withdraw your consent on personal data processing pursuant to the procedure envisaged under the Law of the Republic of Armenia “On Protection of Personal Data”. Withdrawal of your consent on personal data processing entails the consequences stipulated in part 6 of Article 21 of the Law of the Republic of Armenia “On Protection of Personal Data”.

## **Contact information**

NVB values your feedback on our website and Privacy Policy. If you have any questions or concerns regarding this policy, please feel free to reach out to NVB’s designated officer at [info@nvbrokerage.com](mailto:info@nvbrokerage.com). Your input is important to us.