



PRIVACY NOTICE

Pursuant to the Regulation 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; "GDPR"), we would like to inform you that:

1. Summary

Mori Capital Management Ltd. ("Mori") is an independent asset management company owned by its management specializing in Emerging European, Middle Eastern and African markets (EEMEA). Protecting the confidentiality and security of personal information is integral to the way in which Mori conducts its business.

2. Data Controller

The controller of your personal data in relation to investment services provided to you and for the other purposes identified below is Mori Capital Management Ltd, with its registered office in Malta at Office 35, Regent House, Bisazza Street, Sliema, SLM1604, Malta.

This Privacy Notice does not apply to information collected, stored, shared or distributed by third-party sites. This Privacy Notice does not apply to our employees, who are covered by our internal notices, policies and procedures.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

3. Categories of Personal Data

Mori may process the following categories of personal data:

3.1 Information Provided by You

- **Identification data and contact information:** forename(s), family name, surname, date and place of birth, nationality, personal identification number, personal ID card or passport number (name of document, number and series), place of residence (post code, town, street, building number, flat number, voivodship, county, municipality), registered address, business telephone number, business e-mail address, position (including information on any political position), business name, business address, gender, photographs, IP address, tax identification number and information on tax residence status;
- **Financial and transactional data:** e.g. bank account details, money transfers, assets, declared investor profile, credit history, origin of funds, debts and expenses;
- **Data relating to your habits and preferences:** data which relate to your interest in and use of our products and services in relation with financial and transactional data;
- **Data from your interactions with us:** data collected through our internet website, meetings, calls, chats, emails, interviews, phone conversations.



3.2 Information We Receive from Other Sources

- **Information from public sources:** We may collect information from the public domain about individuals who work at companies with whom we are seeking to build a business relationship. This information typically consists of business contact details.
- **Information from our employees:** In furtherance of our employment relationship with our employees and our legal and compliance requirements, employees may provide personal information about their spouses / domestic partners and emergency contacts. Depending on the purpose, this information may include, for example, name, contact information, relationship to the employee or account information.
- **Information from our clients:** We may receive information from our clients and prospects about their personnel for purposes of enabling access to our products and managing our business relationship. This information typically consists of business contact details.

4. Purposes and Legal Grounds for Personal Data Processing.

Your Personal Data may be processed by Mori for the following purposes:

- to conclude a business agreement or any other agreement relating to provision of investment services with you;
- to take steps to perform the business agreement or any other agreement relating to provision of investment services concluded with you;
- to record transactions arising from agreements on the provision of business or investment services and for statistical purposes;
- to comply with applicable laws, rules and regulations, and in furtherance of our related internal policies, including compliance policies and records retention requirements;
- to respond to your inquiries and requests that are based on legal rights that you may have (e.g., individual rights under GDPR);
- to manage, protect against and investigate fraud, risk exposure, claims and other liabilities, including but not limited to violations of our contract terms or laws or regulations.
- to analyse customer preferences for the purpose of establishing marketing activities in which you will be interested and for conducting marketing activities regarding services provided by Mori, especially for marketing products or services that match your needs;
- to accept, review and respond to your complaints regarding Mori's activities;
- to perform the obligations imposed on the controller by the provisions of the generally applicable law;
- to perform IT management, including infrastructure management (e.g. shared platforms), business continuity and IT security;
- to establish aggregated statistics, tests and models for research and development, in order to improve the risk management of our company or in order to improve existing products and services or create new ones;
- to centralize your Personal Data in a database enabling representatives of Mori to have access to it on a strict need to know basis so as to allow us to involve the right level of expertise to deal with your requests and avoid unnecessary administrative duplications.



5. Processing and Sharing Personal Data

Where required by applicable data protection law, including the GDPR, our processing of your personal information will be justified on a lawful basis. We do not sell or rent your personal information to third parties. We may be required to disclose your personal information for legal/compliance purposes or in connection with an investigation, or if we believe it is reasonably necessary to prevent harm or loss. Specifically, Mori may provide Personal Data to the following third parties for the purposes specified in clause 4:

- entities and authorities, to which we are obliged or authorized to provide the Personal Data in order to pursue the objectives specified above and for fulfilling the obligations imposed by law. This applies, in particular to the provision of Personal Data to the supervisory authorities, courts and authorities (e.g. tax authorities and law enforcement authorities), independent external advisers (e.g. auditors) or entities providing services and other third parties. This also applies to entities and authorities which are authorized to receive the Personal Data from Mori or which are authorized to demand access to the Personal Data on the basis of the generally applicable provisions of the law;
- companies or persons with whom Mori has concluded a cooperation agreement on entrusting the performance of certain activities for Mori ("Data Processor"), including entities with which Mori has contracted for the destruction of data. Such entities will be obliged by the agreements they have concluded with Mori to apply appropriate security, as well as technical and organizational measures to protect the Personal Data and to process it exclusively in accordance with the instructions provided by Mori;

6. Provision of Personal Data to Third Countries

With respect to transfers originating from the European Economic Area ("EEA") to the United States and other non-EEA jurisdictions, where the level of protection has not been recognised as adequate by the European Commission, we implement standard contractual clauses approved by the European Commission, and other appropriate solutions to address cross-border transfers, as required or permitted by Articles 46 and 49 of the GDPR.

7. Period of Personal Data Storage

While we generally aim to retain your personal information for the period during which we have a relationship with you, there are many reasons why we may need to retain your data for longer. For example, we may need to retain your personal data if the purpose for which we collected it extends beyond the term of our relationship. We may also retain your personal information for a term that corresponds to a statute of limitations, to establish, exercise or defend legal claims, or as otherwise permitted or required by law, so that in each case we have an accurate record of your dealings with us in the event of any complaints or challenges. We may also retain your personal information for compliance or regulatory purposes, where we are required to do so in accordance with legal, tax and/or accounting requirements, or to support a legal process, audits, or requests or requirements of a legal authority or other governmental entity having authority to make the request.



8. Rights of Data Subjects

Depending on the objective and the grounds on which we process your data, you may be entitled to the following rights regarding Personal Data protection:

- right to access your Personal Data: the data subject is authorized to obtain confirmation from Mori as to whether that person's personal data is being processed and, if so, he is authorized to obtain access to it. Mori shall provide you with a copy of the Personal Data that is being processed at your request. Mori may collect a charge at a reasonable amount arising from the administrative costs for all further copies which you request.
- right to rectify your Personal Data: you are entitled to correct the Personal Data which applies to you and which is incorrect. Subject to the objectives of the processing, you are entitled to request that incomplete Personal Data is supplemented, including by presenting an additional declaration.
- right to erase your Personal Data ("right to be forgotten"): you are entitled to demand the deletion of your Personal Data if the circumstances provided for by law take place and Mori is required to delete such Personal Data without delay.
- right to restrict processing of your Personal Data: in such a case, Mori shall, at your request, specify that Data and it may only be processed for specified purposes.
- right to data portability: under certain circumstances, you are entitled to receive your Personal Data in a structured, commonly used machine-readable format, which has been provided to Mori, and you are entitled to send this Personal Data to another entity without obstruction by Mori.
- right to object to further processing of your Personal Data: in certain circumstances, you are entitled to file an objection to the processing of your Personal Data for reasons related to your particular situation and Mori may be required to stop processing such Personal Data.
- the right to file a complaint with the appropriate supervisory authority if the data processing breaches the provisions of the GDPR.

9. Requirement to Provide Personal Data

You need to provide your Personal Data to Mori to enable Mori to provide to you the services or to comply by Mori with obligations referred to in point 4 of this information

10. Security

While Mori aims to safeguard and protect your personal information from unauthorized access, improper use or disclosure, unauthorized modification or unlawful destruction or accidental loss, and Mori utilizes and maintains certain reasonable processes, systems, and technologies to do so, you acknowledge that no transmission over the Internet is completely secure or error-free, and that these processes, systems, and technologies utilized and maintained by Mori may be subject to compromise. Accordingly, we cannot be held responsible for unauthorized or unintended access that is beyond our control.



11. Managing your Subscription to our E-Newsletter

You can unsubscribe from our e-newsletter at any time by emailing us directly at info@mori-capital.com

12. Exercising Your EU Specific GDPR Rights

Please contact us should you wish to exercise any of your GDPR Rights.

13. How to Contact Us

If you have any questions in relation to this policy (other than in relation to any GDPR Rights), you can contact us at:

Mori Capital Management Limited
Office 35, Regent House
Bisazza Street
Sliema
SLM 1604
Malta
Email: info@mori-capital.com

14. Changes to this Notice

This Privacy Notice may be changed from time to time to reflect changes in our practices concerning the collection and use of personal information. Please check back frequently to see any updates or changes to this Privacy Notice.

May 25, 2018