

PRIVACY POLICY

PROCESSING, PERSONAL DATA AND DATA SUBJECTS

In accordance with disclosures required by the General Data Protection Regulation (“GDPR”), the following information provides an overview of how Fund Innovative Tools PC (“we”, “us”, “our”) use personal data we collect from you. Throughout this Privacy Policy we will refer to you as “customer” or “user” or “you” and we will refer to the Terms of Use between Fund Innovative Tools P.C. and end user of the platform as “agreement”.

1. PROCESSING BY FUND INNOVATIVE TOOLS P.C.

1.1 Scope

Fund Innovative Tools P.C. will process personal data provided by the Customer (including personal data inputted by the Customer in using the Platform in accordance with the Permitted Purposes) on behalf of the Customer on the basis of this agreement.

1.2 Nature

Fund Innovative Tools P.C. will process personal data in order to perform its obligations under this agreement, and only on the documented written instructions of the Customer, unless Fund Innovative Tools P.C. is required by Applicable Laws to process personal data.

1.3 Purpose of processing

The purpose of data processing under this agreement is the provision of the services in accordance with the Permitted Purposes pursuant to this agreement.

1.4 Duration of the processing

Fund Innovative Tools P.C. will process personal data until the expiration or termination of this agreement, unless prohibited by Data Protection Legislation.

2. TYPES OF PERSONAL DATA

The types of personal data that will be processed under this agreement include:

- (i) master data of the Customer (including names, contact details, addresses, passport and/or identity numbers, payment details and signatures);
- (ii) master data of the Customer’s employees (including names,

- contact details and job titles), if the customer is a legal entity;
- (iii) login credentials (including usernames and passwords) of users of the Platform;
- (iv) account details (including activity levels and account preferences);
- (v) portfolio data relating to the investments made by the users; and
- (vi) billing and payment data.

3. CATEGORIES OF DATA SUBJECT

The categories of individuals affected by the processing of personal data under this agreement include:

- (i) Customer provided he/she is natural person;
- (ii) employees who have been authorised by the Customer (if the customer is a legal entity) to use the Platform for Permitted Purposes.

We may update this privacy notice from time to time in order to clarify it or address changes in GDPR or our business operations. We will notify you if we make any substantial updates.

23 MAY 2024

