

PRIVACY POLICY

1. **General provisions**

- 1.1. The most important condition for the implementation of the objectives of Inanomo Finance Ltd. (here in after referred to as the Company) is to ensure the required and sufficient level of information security of assets, including, among other things, personal data and the processes for which such data is processed.
- 1.2. Ensuring the security of personal data is one of the Company's priorities.
- 1.3. The Company appreciates its relationship with its existing and potential customers (hereinafter referred to as the Customers) and visitors to the Company's Internet resources; the Company understands the importance of ensuring security and confidentiality of their personal data.
- 1.4. The Privacy Policy is intended to explain to the visitors of this site how and for what purpose the Company collects, stores, protects and uses the personal data of its Customers.
- 1.5. By agreeing to the terms and conditions of the Customer Agreement and/or using the services of the Company, the Customer thereby gives full consent to the collection, storage, protection and use of their personal data in accordance with this Privacy Policy, and among other things, to receive mailings, including those of advertising character.
- 1.6. In case of disagreement with this Privacy Policy, the Customer should discontinue the use of the Company's services.
- 1.7. This Privacy Policy applies to all Internet resources of the Company (websites, domains, as well as all subordinate objects owned or controlled and/or operated by the Company) and shall not apply to websites of other (non-affiliated) companies linked to the Company through hypertext links.
- 1.8. The Company proceeds from the fact that the user initiating the use of the Company's Internet resources:
 - 1.8.1. Uses the Company's Internet resources on its own behalf and reliably indicates personal data where necessary;
 - 1.8.2. Determines and controls the settings of the software it uses;
 - 1.8.3. Has the opportunity to familiarize themselves with this Privacy Policy by following the Privacy Policy hypertext link on the Company's website.

2. **Concept and composition of personal data**

- 2.1. The Company considers any information relating to an individual directly or indirectly determined or determinable (subject of personal data) to be information constituting personal data.
- 2.2. Personal data includes:
 - 2.2.1. Personal information provided by the Customer who submits (enters) their personal data, documents (copies of documents, including in electronic form) when filling in electronic forms on the Company website, as well as in the event of their written requests to the Company, inquiries via the Company's online chat, etc.

Such information includes, but is not limited to: name, mobile phone number, email address, address of registration, mailing address, identity document details and data contained therein, bank account details and bank agreement details, etc.
 - 2.2.2. Documents required for the Customer identification: identity document details and the data contained therein, utility bills and/or bank statements or constituent documents of the Company;
 - 2.2.3. Financial information: investment and trading experience of the Customer;
 - 2.2.4. Financial documents provided by the Customer to confirm the fact of the transaction (confirmation of the transfer of funds): certified payment orders, bank statements, credit card copies, etc.

- 2.2.5. Standard data automatically received by the http server when accessing the Company's Internet resources (ip-address of the host, address of the requested resource, time, type and information about the viewer that sent the resource request, type of the user's operating system, address of the page from which requested resource);
- 2.2.6. Information automatically obtained when accessing the Company's Internet resources (cookies).

3. Purposes of personal data processing

- 3.1. The Company processes personal data for the following purposes:
 - 3.1.1. Performing transactions on the securities market, preparation for entering into, entering into and performing labor contracts, preparing for entering into, entering into and performing other contracts, agreements, provision of information (refusal to provide information), promoting the market (including through direct contacts with the client using the means of communication, including electronic means of communication, postal items, SMS messages), the Company's products (services), joint products of the Company and third parties in whose interests the Company operates, products (goods, works, services) of third parties in whose interests the Company operates;
 - 3.1.2. Identification of the Customer and/or representative of the Customer, both in relation to the Customer, and in relation to third parties;
 - 3.1.3. Processing of trade and non-trade operations, the implementation of measures aimed at protection against fraud.
 - 3.1.4. Timely informing the Customer on the news, increase of the range of services and products provided by the Company, promotions and promotional offers of the Company; advising our Customers on a wide range of issues;
 - 3.1.5. Information about the advertising and / or marketing campaigns, surveys and polls and/or marketing campaigns held by the Company and/or by third parties in whose interests the Company act and regarding the services provided by the Company and/or by the parties in whose interests the Company acts;
 - 3.1.6. Maintaining a correct database of customers and client accounts;
 - 3.1.7. Analysis of statistical data on the use of the Company's Internet resources, their performance and efficiency, in order to offer Customers higher quality products and services.

4. Principles of processing, storage and protection of personal data

- 4.1. The Company processes personal data on the basis of the following principles:
 - 4.1.1. Legality and transparency of the purposes and methods of personal data processing;
 - 4.1.2. Compliance of the personal data processing purposes with the goals previously determined and declared by the Company during the personal data collection, as well as their compliance with the Company's authority;
 - 4.1.3. Compliance between the volume and nature of the personal data being processed and the methods of personal data processing to the purposes of personal data processing;
 - 4.1.4. Reliability of personal data, their adequacy for the purposes of processing, inadmissibility of the processing of personal data redundant in relation to the goals stated in the collection of personal data;
 - 4.1.5. Inadmissibility of combining the databases established for incompatible purposes with databases containing personal data;
 - 4.1.6. Storage of personal data should be carried out in a form that allows to determine the subject of personal data, not exceeding the time of their processing, provided that the storage period for personal data is not established by law or by the contract to which the subject of personal data is a party or beneficiary;

4.1.7. Destruction upon reaching the goals of processing personal data or in the event when they are no longer required, unless otherwise provided by law.

- 4.2. The company processes personal data using automation tools, information technologies and hardware, including computer equipment, information technology complexes and networks, tools and systems for transmitting, receiving and processing personal data, software (operating systems, database management systems, etc.), information security tools used in information systems, as well as without the use of automation tools.
- 4.3. The Company may transfer personal data of the personal data subject to its subsidiaries and/or affiliated companies, banks, auditors, agents of the Company, including payment agents, or other trusted organizations and persons (hereinafter referred to as Attorneys) only for the purpose of processing of your trade and non-trade instructions. The Company guarantees that the Attorneys will comply with this and will do their best to protect confidential information of the Company's Customers. The Company has the right to provide confidential information about the Customers' personal data to third parties other than Attorneys, only in the case when the Company has received a formal request from the administrative and/or judicial authorities.
- 4.4. The Company undertakes not to provide access to the Customers' personal data to anyone other than the Company's employees, agents, partners and associates, to the extent that is required for the conduct of business, including, inter alia, banking and credit relations. The Company guarantees compliance with this Privacy Policy by the specified persons, including taking adequate measures to store and protect the personal data of Customers.
- 4.5. The Company shall not place personal data of the subject of personal data in publicly available sources without such person's prior consent.
- 4.6. The Company has the right to disclose the personal data of the Customers to the federal or state regulatory and law enforcement agencies in whose jurisdiction the Company is located, in response to relevant official requests for such information, and also has the right to disclose information about the Client in response to court rulings or summons.
- 4.7. The Company shall take all the necessary organizational and technical measures to ensure the security of personal data from accidental or unauthorized access, alteration, disclosure or destruction, blocking access and other unauthorized actions. These measures include, inter alia, internal verification of data collection, storage and processing processes and security measures, including appropriate encryption and measures to ensure the physical security of data to prevent unauthorized access to personal data storages.

5. Links to third-party Internet resources

- 5.1. Internet resources of the Company may contain hypertext links to Internet resources of other (non-affiliated) companies. When you follow a link to another website, you leave the Company's Internet resource. The Company does not manage the Internet resources of other companies and does not control their methods of ensuring confidentiality, which may differ from those adopted in the Company. Personal data that the Client discloses to other companies will not be subject to this Privacy Policy. The Company recommends that you thoroughly read the privacy policies of other companies before sharing your personal information with them.

6. Letters addresses to the Company

- 6.1. All correspondence sent to the Company by the Customers or visitors of the Company's Internet resources (letters in regular or electronic form, comments to the Company's materials, etc.) is perceived as restricted

information and can be published only with the written consent of the sender. The sender's address, telephone number and other personal data may not be used without their express consent, except for an answer on the subject of received correspondence.

7. Cookies

7.1. Cookies are small data fragments dispatched by the web server to be stored on the user's computer as a file so that the web site can extract this information the next time the user logs in. This file is sent to the web server each time in an http request when you try to open the page of the corresponding site. Cookies may be used on some pages of the Company website in order to provide Customers with faster and more convenient access. If the Customer does not wish to receive cookies, most web browsers allow them to be rejected, while at the same time allowing the Client to visit the Company website without any restrictions. Cookies are not used to identify visitors to the Company website.

8. Consent to personal data processing

8.1. By registering on the Company website, in accordance with this Policy:

- 8.1.1. You agree to the use of your personal data, as well as to their processing: collection, recording, systematization, accumulation, storage, refinement (update, change), retrieval, use, transfer (distribution, provision, access), de-identity, blocking, deleting, the destruction of any information relating directly or indirectly to you, your trading operations and payments.
- 8.1.2. You are aware that the Company's processing of personal data will be carried out by the Company in your interests in order to provide you with any advice (clarification) and/or to offer you services provided by the Company and/or services provided by persons in whose interests the Company operates, and/or for the purpose of conducting surveys, questionnaires, advertising and marketing research in relation to the services provided by the Company and/or persons in whose interests the Company operates, as well as to inform about advertising and/or marketing campaigns by the Company and/or the above-mentioned persons in relation to the services provided by the Company, as well as persons in whose interests the Company acts, by contacting the Customers directly or by phone, mail, using facsimile communications, e-mail, as well as using other means of communication, as well as with a view to preparing for the conclusion, for the purposes of entering into, executing, changing, terminating contracts (agreements) between the Customers and the Company or persons in whose interests Procedure Company, including proper identification of the Customer and/or their authorized representative, as well as to prepare the application forms, notices, agreements, contracts that do not involve direct conclusion, termination, changes in the relevant treaties, agreements and other purposes, corresponds to the direction of the above purposes.
- 8.1.3. You acknowledge that you are aware of the purposes of processing your personal data.
- 8.1.4. You confirm that you have been notified that the processing of personal data is carried out by the Company in any way, including both using automation equipment (including software) and without using automation equipment (using various physical media, including paper media).
- 8.1.5. You acknowledge that the processing of personal data may be carried out both by the Company and other persons who have entered into an agreement with the Company on the terms of confidentiality and responsibility for disclosing Personal Data.
- 8.1.6. This right (consent) is valid for 75 years and can be revoked by sending a written notice to the Company. This consent is considered revoked after 30 (thirty) days have passed since the Company received a written notice of the withdrawal of this consent. The date of the notification shall not be included in 30 (thirty) day period.

9. Miscellaneous provisions

- 9.1. This Privacy Policy is an open and public document. The current edition is posted on the Internet on the Company's Internet resource.
- 9.2. The company reserves the right to change the Privacy Policy with appropriate notification on the page located by this address. Changes to the Privacy Policy will be posted on this page. In case of significant changes, the Company will notify Clients in a more explicit manner (for example, via e-mail).
- 9.3. This Policy is subject to change, amendment in the event of changes in existing legislation and the emergence of new legislation, and special regulatory documents on the processing and protection of personal data.