

## DATA PRIVACY STATEMENT

Ver 3, 2023

Protecting the privacy and protection of personal and financial data of our clients is one of our highest priorities.

Investment company "FINVEO" JSC Podgorica (hereinafter: the Company) operates in accordance with the Law on Personal Data Protection ("Official Gazette of Montenegro", No. 079/08, 070/09, 044/12, 022/17) which is also harmonized with the General Regulation Of the European Union on the protection of personal data - General Data Protection Regulation (GDPR).

Please read this *Data Privacy Statement* which clearly explains how the Company collects, processes, stores and protects customer information. This Data Privacy Statement outlines our commitment to safeguarding your personal information and explains how we collect, use, and protect your data. We understand the importance of your privacy and strive to provide transparency in our data handling practices. By using our services, you acknowledge and agree to the terms outlined in this Data Privacy Statement. We will periodically adjust the statement to new laws and technologies to keep it in line with business and changing circumstances.

By submitting a request for opening an account, you give your consent to the collection and use of personal data by the Company as explained in this Data Privacy Statement. The Company is committed to open and transparent management of your personal data. The purpose of the use of your personal data will be stated in all cases where required in our documents and interactions with you.

### Collection of personal data

You can use the website of the Company - [www.finveo.com](http://www.finveo.com) without disclosing your personal data.

However, the Company requests information in order to provide you with services of account opening, order execution, safekeeping of property and privacy, as well as for the execution of all services in accordance with your request. For this purpose, the Company may in certain circumstances collect information from relevant banks and/or credit agencies or other sources that will help us create the best possible profile and thus enable the provision of better services.

### The information collected by the Company includes:

- Information contained in the application that includes personal information you provide to us in your application, such as your full name and surname, address, date of birth, email address, employment details, amount of income, source of income, tax information etc. which are used to evaluate your application, which is defined by Law on Anti-Money

### Finveo

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Laundrying and Terrorist Financing of Montenegro and Law on Capital Market of Montenegro. The information you provide to us is also used for the purpose of maintaining communication with you.

- Transaction information that includes information for the purpose of assessing your trading experience and thus the suitability of conducting transactions with our products and services, as well as information on the expected volume and value of your transactions with us in order to build your economic profile. When you trade with us, we also collect information on the volume and value of transactions you have had with us.
- Verification information that includes information needed to verify your identity such as National Identity Card, passport, passport number, proof of residence address. This information may also include basic information about you from public records or from other entities not related to the Company. Please note that we record telephone conversations or electronic communications in connection with concluded transactions and the provision of services related to the receipt, transmission, and execution of client orders.

In accordance with the Law on Prevention of Money Laundering and Terrorist Financing ("Official Gazette of Montenegro", no. 033/14, 044/18, 073/19), we may request verification of your identity and other personal data. Your personal data is treated strictly in accordance with the Law on Personal Data Protection.

### **Use of personal information and its disclosure**

The data we collect will be used only for the purposes of providing our services or for other purposes for which you have given your Consent, except in cases where the law provides otherwise. They also help us improve our services, set up and manage your account, have insight into your current needs, improve customer service, tailor your search to your needs, and inform you about relevant products, services, or promotions. If for any reason you do not wish to receive notifications of this nature contact us at [compliance@finveo.mn](mailto:compliance@finveo.mn).

In accordance with the Law on Capital Market ("Official Gazette of Montenegro", No. 001/18) the Company keeps personal data on clients for a period of at least five years. The Company reserves the right to disclose personal data to third parties when required by law, regulatory authorities, law enforcement agencies or other state bodies, competent jurisdictions in order to protect our rights and/or in case of compliance with legal procedures. In such circumstances, the Company will explicitly inform the third party about the confidential nature of the information. We may disclose your personal information:

- other companies that provide financial and other services for the Company and their clients,
- our affiliated bodies, agents, employees and representatives,
- Capital Market Authority, Financial Intelligence Unit of Montenegro and other reference institutions,
- financial institutions and other similar organizations in connection with our corporate activities or designated by you,

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- external service providers and professional advisors who provide us with services such as invoice processing, customer service, conducting customer satisfaction surveys or other activities to collect relevant data for our business,
- credit institutions, collection agencies, courts, regulatory bodies as agreed or authorized by law,
- any organization at your request or an authorized person, including your financial advisor, broker, lawyer or accountant,
- partners, branches and unions and brokers with whom we cooperate,
- the person responsible for your application. *You hereby unambiguously agree to exchange information with that person* and
- to an authorized individual, as specified by that individual or contract.

The Company does not sell, license, lease or in any other way disclose personal data to third parties, except as described in this Statement.

### **Integrity and protection of personal data**

In order to collect and store current, accurate and complete information, please notify us immediately of any changes in personal data that the Company has about you. Personal information is securely stored on servers accessed only by authorized personnel via a password. While we take these steps to protect your data, it's essential to note that no method of data transmission over the internet or electronic storage is completely secure. However, we are committed to using industry-standard practices to safeguard your information. We conduct routine security assessments and audits to identify and address potential vulnerabilities. All personal data is encrypted and the Company takes all possible protection measures in order to prevent unauthorized access to the same.

### **Statistics and cookies**

The Company uses cookies in order to collect statistical information about visitors to our websites. The data collected are: number of visitors, pages visited, types of transactions performed, time spent online and downloaded documents, name of your ISP, IP address, date and time of access, difference in time zone compared to the mean time per Greenwich Mean Time (GMT), content of the request, access status / HTTP status for the amount of data transferred, browser, language setting, browser version, operating system and screen area, website through which you linked to our website, websites you visited from our pages.

This information is used to evaluate and improve the performance of our websites. Apart from statistical information, we do not collect any information about you through our website, unless you provide it to us. The Company may share statistics on the use of websites with reputable advertising and marketing companies. The information does not reveal the identity of the user.

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### **The right to insight and correction**

You have the right to inspect all your personal data stored with us, the right to correct, supplement and delete them when they are incomplete, inaccurate and out of date. For the above, it is enough to send an e-mail to our address [compliance@finveo.mn](mailto:compliance@finveo.mn).

### **Limitation of liability**

The Company is not responsible for the content of the privacy policies of the websites to which it is linked. The Company has no control over the use or protection of information provided by the Client to these sites. Whenever the Client decides to link to a co-branded website or a linked website, he may be required to register or provide other information. Please note that in this case the information will be recorded and regulated by third parties and their privacy policy.

### **Client's Consent**

By submitting a request to open an account in the Company, you agree that the Company collects, maintains, uses, discloses and transfer personal data outside of country, that you or another person has provided as described above.

### **Contact us**

For all questions about our Privacy Statement, how to update personal data, their access, contact us by phone or email [compliance@finveo.mn](mailto:compliance@finveo.mn).

### **Amendments to this Privacy Statement**

The Company reserves the right to amend this Statement in accordance with the dynamics of regulations and operations. You agree and accept all changes that will be submitted to you for inspection on our website. Any dispute regarding our Privacy Statement is subject to our Terms and Conditions.

The Company advises its clients to periodically check and review this Privacy Statement.

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