



Privacy Notice

Introduction:

Avalon Capital Markets Limited (Avalon) is committed to protecting and respecting your privacy. We believe that the confidentiality and protection of our customer information is one of our most fundamental responsibilities whether you are an existing client or a perspective one.

In this notice, “**we**”, “**us**” and “**our**” means **Avalon Capital Markets Limited**, being the entity providing services to you.

This privacy notice applies to each of the following who interact with Avalon (whether directly or through an affiliate within the Avalon Group) its branches and its subsidiaries, existing and prospective clients, suppliers, personnel of corporate clients/suppliers, other persons (excluding employees and job applicants to whom a separate privacy notice applies) and website users whose personal data we may process.

For the purposes of the applicable data protection legislation, we are a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law.

We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on this website.

Which personal data do we collect?

We may collect and process the following personal data about you:

- 1) Information that you provide to us or one of our affiliates. This includes information about you that you give to us by filling in forms or by communicating with us, by phone, e-mail or otherwise. This information may include:
- 2) your name, date of birth, nationality, address and related contact information, including telephone numbers, fax number, email address and identification documentation, including passport and other government or state issued forms of personal identification, photographic or video images, telephone or electronic recording; and
- 3) Relevant information about you that we might obtain from other sources.

We understand that you have the right, power and authority, and have taken all action necessary to provide us with the personal data of your representatives in compliance with applicable laws and regulations and we will collect, use, store, disclose and otherwise process (hereinafter “process”) personal data of you and/or your representatives in accordance with this notice.

For which purposes will we use your personal data?

Your personal data may be stored and processed by us in the following ways and for the following purposes:

- to meet our legal obligations as a service provider, and perform our obligations and exercise our rights under our terms of business. For example, we may use your personal data to communicate to you or to comply with certain Anti-money laundering (AML) and compliance requirements.

We are entitled to use your personal data in these ways because:

- we must comply with our legal and regulatory obligations;
- we may need to in order to establish, exercise or defend our legal rights or for the purposes of legal proceedings; or
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the management of the agreed services;
 - maintaining compliance with internal policies and procedures; or
 - being able to contact you.

With whom will we share your personal data?

We may share your personal data in the following circumstances:

- Affiliates within the Avalon Group
- for compliance with applicable laws, or as required by law of relevant government or administrative authority and then, to the extent reasonably possible, only subject to customary undertakings of confidentiality;
- in connection with legal proceedings or otherwise to assert and protect our legal interests;
- to third party service providers, outside counsel, auditors, and other independent professionals in connection with the services and the purposes as described in this notice;
- if Avalon is subject to a bid, or otherwise merges with or is acquired by another business or company in the future, we may share your personal data with the new (or prospective) owners of the business or company.

To ensure that your personal information receives an adequate level of protection, we put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects, the law and regulation on data protection.

Transfer of personal data outside the European Economic Area

The personal data that we collect from you may be transferred and stored abroad, if required for the Permitted Purposes as described above. This may include countries which do not provide the same level of protection as the laws of the European Economic Area ("EEA"). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws.

This can be done in a number of ways, for instance:

- the country that we send the data to may be approved by the European Commission as offering a sufficient level of protection;
- the recipient might have signed up to a contract based on "model contractual clauses" approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law. You can obtain more details about the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the "Contacting us" section below.

For how long do we retain your personal data?

Your personal data will be deleted when it is no longer reasonably required for the Permitted Purposes and we are not legally required or otherwise permitted to continue storing such data. We will, in particular, retain your personal data where required for Avalon to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

Your rights

Subject to certain legal conditions, you may have various rights in respect of your personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;

- the right to request that we erase your personal data in certain circumstances.
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

Cookies

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

We may use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

Contacting us

The content contained within this Notice is not intended to limit or override the scope of any other consent to disclose separately given by a party to any other party (including pursuant to a separate agreement or any other protocols). Any agreement between the parties to maintain confidentiality of information contained in any non-disclosure, confidentiality or other agreement shall continue to apply. In the event of a conflict, the terms set out in this Notice shall prevail only to the extent necessary for the parties to comply with applicable law and regulation.

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please email: jaknin@avaloncapitalmarkets.com

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk>.