

# Privacy Policy

NEOETF Management Partner S.à r.l. (hereinafter referred to as “Company”, “we”, “us”, “our”) regularly collects and uses information that can identify an individual (“personal information”), about the use of our products, services, mobile and software applications, and websites. Each User is important to the Company, and therefore, the protection of your personal data is very important to us, and we understand our responsibility for ensuring the safety of personal data and compliance with the requirements of the legislation of the Grand Duchy of Luxembourg.

This Privacy Policy (hereinafter referred to as the Policy) applies to all information that the Company and/or its affiliates may receive about the user, client, (hereinafter referred to as the user) during their use of the website, services, programs, and products of the Company (hereinafter referred to as - Services). The user’s consent to provide personal information, given by him/her in accordance with this Policy, applies to all persons using the Company’s services.

The Policy describes the procedure established by the Company for processing personal data collected through the Internet resource: [www.h2k.me](http://www.h2k.me) (hereinafter referred to as the website) and/or the H2K mobile application, and related services and tools. In all these cases, the Company processes personal data of users exclusively within the framework of the requirements of the Luxembourg Law of August 2, 2002, on the protection of personal data (Loi du 2 août 2002 relative à la protection des personnes à l'égard du traitement des données à caractère personnel), and international treaties ratified by Luxembourg. This Privacy Policy has been developed in accordance with their standards.

## 1. Personal information of users that the Company receives and processes

1.1. For the purposes of this Policy, “personal information” means:

- 1) Personal information that the user provides about himself/herself independently during registration or in the process of using the Services, including the user’s personal data. Information required for the provision of Services (provision of services, cooperation) is marked in a special way. Other information is provided by the user at his discretion.
- 2) Data that is automatically transferred to the Services during their use using the user installed on the device, including IP address, information about the user’s browser (or other program through which the Services are accessed), access time, address of the requested page.
- 3) Other information about the user, if its collection and/or provision is provided for in other internal documents of the Company, agreements, contracts.
- 4) This Policy applies only to the Company Services. The Company does not control and is not responsible for third party sites that the user can access via links available on the Company’s website. On such sites, other personal information may be collected or requested from the user, and other actions may be taken.

1.2. The company has the right to verify the accuracy of personal information provided by users but does not exercise control over their legal capacity. However, the Company assumes that the user provides reliable and sufficient personal information on the issues proposed in the registration form and keeps this information up to date. The risk of providing false information is borne by the user who provided it.

## 2. Purposes of collecting and processing personal information of users

2.1. The Company collects and stores only those personal data that are necessary to provide Services and provide services (execution of agreements with the user).

2.2. The Company may use the user's personal information for the following purposes:

- 1) Identification of the party within the framework of agreements and contracts with the Company;
- 2) Providing the user with personalized Services;
- 3) Communication with the user, including sending notifications, requests and information regarding the use of the Services, the provision of services, as well as processing requests and applications from the user;
- 4) Improving the quality of the Services, ease of use, development of new Services;
- 5) Conducting statistical and other studies based on anonymized data.

2.3. When a user accesses the site or uses the Company's services, we may place small data files called cookies on your computer or other device. We use these technologies to recognize a user as our user (customer), customize our site, understand usage and determine the effectiveness of email marketing campaigns, measure advertising effectiveness, and collect information about a user's computer or other access device to mitigate risks, help prevent fraud and increasing trust and safety. The user can control the use of cookies in the settings of their Internet browser. If a user rejects or deletes certain cookies, you should be aware that the performance of related features and functionality of our websites and services may be impaired. Web beacons (or pixel tags) are electronic images that may be used in our web services or email to help deliver cookies, count site visits, understand usage, and determine the effectiveness of email marketing campaigns.

### **3. Conditions for processing the user's personal information and its transfer to third parties**

3.1. Confidentiality of the user's personal information is maintained, except in cases where the user voluntarily provides information about himself/herself for general access to an unlimited number of persons.

3.2. The company has the right to transfer the user's personal information to third parties in the following cases:

- 1) The user has expressed his consent to such actions;
- 2) The transfer is necessary as part of the user's use of a certain Service or to provide a service to the user;
- 3) The transfer is provided for by applicable law within the framework of the procedure established by law;
- 4) In order to ensure the possibility of protecting the rights and legitimate interests of the Company or third parties in cases where the user violates the Terms of Use of the site, agreements, contracts, internal documents of the Company.

### **4. Change by the user of personal information, user rights**

4.1. The user may at any time change (update, supplement) or delete the personal information provided by him/her or part of it by sending a request to change, update or delete personal information or part of it using the feedback form on the Company's website.

4.2. The user cannot withdraw consent to the collection and processing of personal data in cases where this is contrary to the laws of the Grand Duchy of Luxembourg, or if there is an unfulfilled obligation.

4.3. Rights of users in connection with the processing of their personal data by the Company:

- ✓ to know that the Company, as well as a third party, has personal data, and also receive information containing: confirmation of the fact, purpose, sources, methods of collecting and processing personal data; list of personal data; terms of processing of personal data, including periods of their storage;
- ✓ to require the Company to change and supplement your personal data if there are grounds supported by relevant documents;
- ✓ to demand from the Company, as well as a third party, the destruction of their personal data, the collection and processing of which was carried out in violation of the legislation of the Grand Duchy of Luxembourg, as well as in other cases established by the regulatory legal acts of the Grand Duchy of Luxembourg;
- ✓ to withdraw consent to the collection and processing of personal data, except in cases provided for in article 5 of the Luxembourg Law on the Protection of Personal Data.
- ✓ to protect their rights and legitimate interests, including compensation for moral and material damage;
- ✓ to exercise other rights provided for by these laws of the Grand Duchy of Luxembourg.

## **5. Measures taken to protect users' personal information**

- 5.1. The company takes necessary and sufficient organizational and technical measures to protect the user's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.
- 5.2. All information that the Company collects is reasonably protected by technical security measures and procedures to prevent unauthorized access or use of the data. Company affiliates, partners and third-party service providers agree to use information received from Company in accordance with our security requirements and this Policy.

## **6. Changes to the Privacy Policy. Applicable Law**

- 6.1. The Company may make changes to this Policy as necessary to keep the document current: to comply with legal requirements or for other reasons. The Company will notify you of material changes to this Policy by sending you an email or posting a notice on our website. We recommend that you regularly check and review the Policy to be aware of what information the Company collects and how personal data is used.
- 6.2. Use of the Services means the user's unconditional consent to this Policy and the conditions for processing his personal information specified therein; in case of disagreement with these terms, the user must refrain from using the Services.
- 6.3. This Policy and the relationship between the user and the Company arising in connection with the application of the Privacy Policy are subject to the law of the Grand Duchy of Luxembourg.