**Privacy Policy**

Please read the Privacy Policy carefully. This document is an integral part of the agreement between you (also named “User”) and the **Company**.

Privacy Policy describes the rules for Pension Invest (the **Company**) work concerning your personal data. We are serious about protecting the personal data of our customers and preserving confidential information. To avoid the loss of information, its misuse, alteration, and unauthorized access to it by third parties, we comply with all requirements, both organizational and technical.
Personal data includes any User data that identifies him as an individual. This policy also explains the use of personal data that we collect when you use our services by communicating with us by phone, e-mail, or by other means. This Policy informs you what type of information we collect, with whom we share it and for what purposes, how we protect it, and what rights you have to preserve the confidentialy of your information. By accepting the Privacy Policy, the User agrees to the collection, storage, use, and disclosure of personal data following this Privacy Policy and applicable law. You can withdraw your consent and request that you remove your data by contacting us.

**What personal data does the Company collect?**

You can provide us with identification, contact, financial, and other information when you fill out online forms or send us application forms by phone, as well as by e-mail during authorization in the Personal Account or in another way.
Also, all the personal data that you provide in cases where:
• use our products or services;
• register your account on our website;
• subscribe to our publications or third-party publications related to us;
• agree to receive our promotional materials and newsletters;
• participate in a contest, loyalty program, special promotions, or surveys;
• leave reviews.

On individual pages of the site, personal data may be requested, which you can provide if you wish (for example, we can request contact information to register a Personal Account, sign up for advertising newsletters, and notifications from us and/or so you can submit applications to us). When you visit our site, certain information is automatically sent to us from your devices. In some jurisdictions, including the European Union, such information may be considered personalized following certain data protection laws. Some of this information is collected using cookies. More information about the cookies we use and the purposes for which they are used is disclosed in the **Cookies Policy.**
The personal information that may be collected by the **Company** falls into the following categories:

✓ information that you provide voluntarily
You can provide the **Company** with your details, contact information, financial data, etc. by filling the forms online, over the telephone, via email, or any other available methods. In addition to the above, certain parts of the **Company** website may ask you to provide personal information voluntarily. The personal information that you are asked to provide, along with the reasons for which you are asked to provide it, will be clarified by your request.

✓ information that the **Company** collects automatically when visiting the **Company** website, certain information (such as your IP address, device type, browser type, etc.) is sent from your device automatically. The **Company** also receives information about how your device has interacted with the website, including the links followed. collecting this information enables the **Company** to conduct analyses of user and Client requests to improve the quality of available products and services.

How can the **Company** use your data?
• Sending you newsletters;
• Proper provision of our services;
• Analysis and understanding of our audience to improve the Service; • investigate violations of this Privacy Policy to ensure compliance, as well as protect our interests and rights.
• We may send you marketing letters with information about our Services that we find interesting for you.

The purposes for which we will use your data:

1. To provide you with customer service. Type of data: identification information (name, surname, country of residence, address, and other similar information), contact details (e-mail address, phone number, messenger number, and the like), national identification documents (passport, id document, residence permit, and others), financial information (bank account number, bank card number, and name of its owner, documents showing the origin of funds and others), political significance (documents and waivers), and documentary information (copies of documents confirming information provided).
2. Risk management, money laundering prevention, and response to regulatory and legal requirements. Type of data: transactional, financial, identity.
3. Marketing. Type of data: contacts, consent, and correspondence. Purpose: marketing activities and the presentation of information and news about products and services. Legal grounds: the implementation of the contract with you.

**What information can the company disclose to certain third parties?**

We do not pass on information to companies, organizations, and individuals outside the Company unless one of the following conditions applies. We will share your data with companies, organizations, or individuals outside of the Company, if we have a conscientious belief that accessing, using, storing, or disclosing personal data, is reasonably necessary for:
• Compliance with any applicable laws, regulations, lawsuits, or coercive government requests;
• The application of current legislation, including the investigation of possible violations;
• identifying, preventing fraud, supporting security, or solving technical problems;
• Protect the rights, property, or security of the **Company**, our users or the public as necessary or within legal limits.
• Group companies, third-party service providers, and partners who provide the **Company** with data processing services (for example, to provide functionality or help to enhance the security of the **Company** website) or who otherwise process personal information for the

purposes described in this Policy;
• Any competent law enforcement body, regulatory or government agency, the court, or other third parties as permitted by law.

We can share identifiable information in public and with our partners. For example, we may publish information in public to show trends in the overall use of our website. If the **Company** participates in the merger, acquisition, or sale of assets, we will continue to ensure the confidentiality of any personal data and notify Users before the personal data are transferred or become subject to another privacy policy. We will not share your name, email address, or other information with other users.
Under certain conditions, we may transfer your data to a third party in another country for further processing following the objectives set out in this Policy. In some cases, this may include the transfer of data to countries that do not provide the same level of protection as the laws of your country of residence. In such cases, we will, following legal requirements, ensure that your privacy rights will be adequately protected by appropriate technical, organized, contractual, or other legal measures.

**What rights does the user have?**

• To send a request for the correction of any inaccurate information and/or the completion of any incomplete personal information. The **Company** will subsequently process the request and notify any third parties to whom such personal information may have been transmitted per the terms set out in this Policy.
• To request the assistance of personal information processing. The refusal of personal data processing may prevent you from being able to access particular products and services for which the processing of personal information is necessary. • To request the erase of all of your personal information, with which the **Company** should comply unless there is a lawful reason for not doing so.
• You have the right to receive a copy of the personal data that we have about you. • You have the right to request that we correct any inaccurate information and/or supplement any incomplete personal data. We will correct our records and notify third parties to whom such personal information could be transferred, as described above.

• You have the right to transfer to another person or request a copy of all personal data that you provided to us, a]er which we will transfer this data to another data controller of your choice.
• You can exercise this right by clicking on the “unsubscribe” or “unsubscribe” link in the marketing letters that we send you. To opt out of receiving any marketing materials sent by the **Company**.
• You have the right to request that we stop processing your data. Please note that this may prevent you from using certain services for which the processing of your data is necessary. • You can withdraw your consent to the processing of your data at any time. This will not affect the legality of data processing to which you previously agreed. Please note that if you withdraw your consent, this may prevent you from using some of the features of our service that require the processing of your data.

• You have the right to file a complaint with the supervisor.

**Company** security measures

The **Company** applies all appropriate technical and administrative measures to protect the personal information that it collects and processes.
In particular, the **Company**:
• Stores personal data on secure servers.
• Uses encrypted transmission links.
• Uses other warranties: firewalls, authentication systems (e.g. passwords), and access control mechanisms to prevent unauthorized access to systems and data. • Regularly reviews methods of information collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to systems. • Restricts access to personal information for employees, contractors, and agents who need to know such information to process it.

**Data retention**

Your personal information is only retained for as long as it is necessary to carry out the purposes set out in this Policy (unless further retention is required by law).

**Automatic decision-making**

In some cases, our use of your data may result in making automatic decisions (including profiling) that affect you legally or have an important influence on you of a different nature. An automatic decision is a decision about you, made automatically based on a computer calculation
(using software algorithms), without human control. When we apply an automatic decision that concerns you, you have the right to challenge the decision, express your point of view, and demand that the person reconsider the decision.

Please contact us with any questions, comments, or for clarification