**Privacy Notice**

This Privacy Notice is provided to you in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation or GDPR) taking into account that the provision by you to the Company of your certain personal data is the condition of the Brokerage and Custody Services Agreement, MiFID II Terms of Business or other contract or agreement, including any individual transaction (the “Agreement”) that has been, or may be in the future, executed by you, or a company you represent, and Veles International Limited (the “Company”). This Privacy Notice is also applicable to the situations where the Company receives your personal data as a result of, or in connection with, the Agreement or in any legitimate way other than specified above.

1. The purpose of the processing your personal data

Personal data provided by you or on your behalf to the Company in relation to, and as required by, the Agreement, including in writing in the respective forms, or orally in face-to-face conversations or by phone, before or after the Agreement has been signed, will be predominantly used by the Company to adequately, securely and timely communicate with you, the person you represent (the “Client”) or for your benefit in the process of delivering services it is duly authorized to deliver (the “Services”). Your personal information will also be used to assess the appropriateness and compatibility of financial instruments (Services) you may instruct the Company to buy (provide) with your needs, characteristics and objectives, as well as to evaluate your legal status, creditworthiness and to discharge the Company’s statutory obligations.

2. The recipients of your personal data

As required by relevant law or court decision your personal information may be provided to the respective state authority or to the person duly appointed or registered by such authority. The Company will also share your personal data with its current internal auditor for the purposes of discharging their auditing functions. The Company may also share certain parts of your personal information with other regulated financial institutions to discharge their or the Company’s legal obligations including for the purposes of compliance with tax law, prevention of financial crime and other respective legislation.

3. The right to access and object to personal data

You have the right to ask for and receive from the Company without undue delay and expense all the personal data relating to you which have undergone processing, as well as any available information as to the source, purpose of processing and the recipients of the data. You also have the right to ask the Company for rectification, erasure or blocking of the personal data which is inaccurate or have other shortages. You also have the right to have your incomplete personal data completed by means of providing the respective additional information to the Company.

Your right of access to personal data may be lifted in whole or in part in accordance with the provisions of the applicable laws

(a) for purposes of proper fulfilment of the Company’s duties and the duties of the supervisory authorities, as these are derived from the respective laws; or

(b) to avoid obstruction of official or legal inquiries, analyses, investigations or procedures for the purposes of the respective laws and to ensure that prevention, investigation and detection of crime is not jeopardized.

4. The right to lodge a complaint with a supervisory authority

You have the right to lodge your written complaint with respect to the Company’s dealing with your personal data to the Cyprus Commissioner of the Protection of Personal Data (the “Commissioner”) at the address: P.O. Box 23378, 1682 Nicosia; Email: commissioner@dataprotection.gov.cy.

5. Obtaining information from third parties

By signing this Notice you give your consent that the Company may also get information about you from certain other organizations. These other organizations include government departments, other local authorities and private sector regulated financial organizations or specialized information agencies. The personal information so obtained will be used for the same purposes and in the same way as specified above.

6. Transfer of your personal data outside the European Union (EU)

By signing this Notice you give your consent that the Company may transfer your personal data outside the EU, particularly, to its parent firm IC Veles Capital (Moscow) regulated by the Central Bank of Russia, to be used exclusively when it is necessary for the purposes of carrying out the Agreement. It is our obligation to warn you of the specific risks that may arise in connection with such transfer due to the absence of an adequacy decision of the European Commission and appropriate safeguards registered by the supervisory authorities.

You also understand and acknowledge your right to withdraw this consent at any time by giving the Company a written notice thereof such notice being equivalent to the notice of termination of the Agreement as set forth in the respective section of the Agreement.

7. The period your personal data will be stored

Your personal data will be stored by us securely for the period of 5 years after the date of termination of the Agreement or any other relevant relations unless longer term is established by the applicable legislation.