

## Privacy Policy Statement

The protection of privacy and the safeguarding of your personal and financial information is our highest priority. In view of the European Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (**GDPR**), please view the following Privacy Policy Statement which clearly explains how we, at Nuntius Brokerage & Investment Services SINGLE MEMBER S.A. (hereinafter as “Nuntius “, located at Dragatsaniou str. 6, 10559 Athens, tel.: +302103350500 email: [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com) , collect, process, store and protect your personal data.

### 1. Collection of personal information

1.1. In case that you are our Client:

- a. Nuntius collects the necessary information for the provision of financial services and in order to open accounts, carry out transactions and safeguard your assets and your privacy. This information includes, inter alia:
  - i. Application information i.e. personal information you provide us in your application form, such as your name, address, date of birth, email address, income and income source etc. The information you provide us is also used for the purposes of communicating with you in the context of our contractual relationship.
  - ii. Transaction information such as information about the anticipated volume and value of your transactions with us and income information provided in order to enable the construction of your economic profile. In compliance with the current legal framework governing investment and financial services (including MIFID II), Nuntius creates investor profiles for each of its clients. Such profile is necessary for assessing the risk profile of each client and is required by law.
  - iii. Verification information necessary to verify your identity in compliance with legal obligations (i.e. AML/KYC obligations), such as an identification card, passport or driver’s license.
- b. Collection of information by third parties: Additionally, Nuntius may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources which help us to comply with legal and regulatory obligations (AML/KYC).

1.2 If you are not our Client, but still you receive our newsletter or other commercial communication from us, then we keep your personal data, including your email, name, telephone number. Such processing is based solely to your explicit consent, which you may revoke at any time without detriment by contacting us at the following address [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com) .

### 2. Legal basis for processing

2.1. Nuntius collects and processes the information mentioned under 1.1. for the purpose of contract performance, namely for the provision of financial services, as well as for compliance with legal and regulatory obligations (such as anti-money laundering and anti- terrorist financing legislation).

- 2.2. Nuntius processes your personal information for the purpose of legitimate interests pursued by Nuntius, namely (a) to enhance client experience and improve our services and (b) to prevent fraud.
- 2.3. Nuntius also uses your personal information (email and/or telephone number) for direct marketing purposes; this information enables us to improve services, customize browsing experience and inform you of additional products, services or promotions relevant to you and the products and services you require. Such processing is based solely to your explicit consent, which you may revoke at any time without detriment by contacting us at the following address [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com).

### 3. Personal Data recipients

- 3.1. **Affiliates and partners:** Nuntius may share information with partners, affiliates and alliances in order to service customer accounts. In addition, subject to your explicit consent, Nuntius may share information with partners, affiliates and alliances in order to offer to you additional similar products and services.
- 3.2. **Regulatory disclosure:** Nuntius may disclose your personal information to local and European supervisory and judicial authorities in cases where such disclosure is required by law, regulatory, law enforcement or other government authority. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority.
- 3.3. **Non-affiliated third parties:** Nuntius may share your personal data with the following categories of third parties:
  - a) Credit reporting or collection agencies for the provision of financial services (i.e. money transfers);
  - b) third parties engaged by Nuntius that carry out certain internal functions such as account processing, technology development, software maintenance & support, fulfillment, client service, electronic communication, client satisfaction surveys or other data collection activities relevant to our business;
  - c) professional, legal, or accounting advisors of Nuntius. The use of your personal information in this case is strictly limited to the performance of such services and is not permitted for any other purpose.
  - d) Where you have been introduced to us by a Business Introducer or by a Tied Agent, such party may have access to your information.

All third parties with which Nuntius shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way Nuntius protects the same. Nuntius will not share personal information with third parties which it considers will not afford its Clients the required level of protection.

### 4. Transfer of personal data outside EEA

We may share your personal information with third parties located outside the European Economic Area ("E.E.A."), when necessary for the performance of our contract with you, in the circumstances that this is inevitable in order to provide you services of high quality. In such cases we take all reasonable precautions to apply the appropriate or suitable safeguards set forth by the applicable legislation on the protection of personal data.

### 5. Retention period of personal data

Nuntius stores your personal data for as long as it is necessary to fulfil our purposes set out in this Privacy Policy and in order to comply with applicable law or defence of any legal claim.

## 6. Data subject rights

You are entitled to exercise the following rights in accordance with the GDPR:

- a) The right to access the personal information concerning you, to correct or rectify inaccurate information and, when applicable, to object to data processing;
- b) the right of erasure of those data that either have been collected solely based on your consent, or they are no longer needed to perform the purpose(s) for which they were collected;
- c) the right to restrict processing when such data are no longer needed to perform the purpose(s) for which they were collected;
- d) the right to have personal information provided in a structured, commonly used and machine-readable format;
- e) the right to withdraw consent at any time and without any detriment, insofar as personal data processing is based exclusively on your consent, including the request to stop receiving marketing communications; you can revoke your consent at any time by clicking the “unsubscribe” link that can be found at the bottom of each such email message; otherwise you can send us your request at [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com).
- f) The right to lodge a complaint with the Hellenic Data Protection Authority in case where you consider that the processing of their personal data infringes the GDPR.

In order to exercise any of your abovementioned rights, please contact us in [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com) . Once we receive your request, we commit to take all possible steps to satisfy your request within reasonable time and within one (1) month the latest, by informing you in written about completion of your request or about the reasons that prevent us from completing your request or part of it, according to GDPR.

## 7. Disclaimer

Nuntius is not responsible for the privacy policies or the content of sites that our websites may link to and has no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded website or to a linked website, you may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

## 8. Use of “cookies“

Nuntius uses cookies to secure your trading activities and to enhance the performance of the keystock.com website. Cookies used by Nuntius do not contain personal information or other sensitive information. Nuntius may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. The information collected by the advertising company is not personally identifiable. To administer and improve the keystock.com website, Nuntius may use third parties to track and analyze usage and statistical

volume information. The third party may use cookies to track behavior and may set cookies on Nuntius' behalf. These cookies do not contain any personally identifiable information.

## 9. Protection of personal data

Any personal information you provide us will be treated as confidential. The personal data that you provide in connection with registering yourself as a user of the Site is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you and shall not be revealed to anyone else. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. Nuntius encrypts all personal data as it is transferred to Nuntius and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

## 10. Privacy statement updates

We may change or update portions of this Privacy Statement to reflect changes in our practices and or applicable law and regulation. Please check this Privacy Statement from time to time so you are aware of any changes or updates to the Privacy Statement. In the event Nuntius materially changes this Privacy Policy Statement including how we collect, process or use your personal information, the revised Privacy Policy Statement will be posted on the website. You agree to accept posting of a revised Privacy Policy Statement electronically on the website as actual notice to you. Any dispute over our Privacy Policy Statement is subject to this notice and our Retail Client Agreement. Nuntius encourages you to periodically check back and review this policy so that you always will know what information Nuntius collects, how Nuntius uses it, and to whom Nuntius may disclose it.

## 11. Contact us

If you have any questions or concerns regarding this Privacy Policy, please contact us on email [info@nuntiuscapital.com](mailto:info@nuntiuscapital.com).

**By opening an account, you hereby consent to such collection, processing, storage and use of your personal data (under 1.1) by us, our associates or third parties in accordance with the provisions contained herein.**

I have read, understood and agree with the terms of this Privacy Policy, and I confirm that I have full power and authority to be bound by the terms of this Privacy Policy.