

PRIVACY POLICY

Olympus Holdings N.V. (the “**Company**”; “**We**”)

This privacy policy explains how We use any personal information we collect about you.

INTRODUCTION

This Privacy Policy explains what information we collect about individuals (“**Personal Data**”), describes the categories of Personal Data We process and for what purposes. We are committed to collecting and using such data responsibly and in accordance with the requirements of the General Data Protection Regulation (GDPR).

We take your privacy seriously and you can find out more here about your privacy rights and how we gather, use and share your personal information.

HOW WE GATHER AND USE PERSONAL INFORMATION

We need to obtain information about you so that we can provide the services you require. This information is normally obtained directly from clients through the course of our client onboarding procedure. It may also be obtained by telephone, email or other means. We may also obtain information from other organisations, where you have provided authority for them to share information.

We hold such information as Data Controllers in accordance with the requirements of Curacao and, where applicable, the EU General Data Protection Regulation, collectively referred to as the ‘**Regulations**’. We use this information to verify and analyse your identity and current standing, in addition to your present and future financial needs so that we can ensure any services provided takes due account of, and is suitable to, your circumstances. We will not share your information with any other party except as indicated in this policy or where required to do so by any statutory, governmental or regulatory body for legitimate purposes.

WHY DO WE NEED TO COLLECT AND USE YOUR PERSONAL DATA?

We collect Personal Data in order to fulfil our legal and regulatory obligations in respect of the services that we provide.

We may also process data where we have a legitimate interest in doing so as virtual asset service provider (and where our legitimate interests are not overridden by your (or the relevant individual's) own interests or fundamental rights or freedoms), e.g. for the purposes of monitoring use and performance of our websites and responding to enquiries.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We may collect the following types of Personal Data:

IDENTIFYING: such as name, date and place of birth, nationality and other unique identifiers such as government-issued identification and national insurance number.

CONTACT: such as telephone number, email address, physical address.

PROFESSIONAL: such as education and employment history.

FINANCIAL: such as a person's financial situation, solvency and any past declarations of bankruptcy.

LEGAL: such as being subject to current or past litigation, having been subject to any criminal convictions or charges, or being subject to successful investigation by a governmental, professional or other regulatory body.

Information relating to usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behaviour information.

HOW WILL WE USE THE INFORMATION ABOUT YOU?

We collect information about you in order to provide our services in compliance with applicable legal and regulatory requirements. We look to ensure that any Personal Data is collected and processed fairly and appropriately, in accordance with the law.

HOW DO WE PROTECT YOUR PERSONAL DATA?

Your information is held securely both at our offices and electronically on servers. We have safeguards in place to ensure that Personal Data is kept securely and is only disclosed in compliance with our information security policy.

Personal Data will not be retained for any longer than is necessary, in accordance with our AML policy.

We take great care in protecting personal information from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical and security measures are in place to protect Personal Data.

WHO MIGHT WE SHARE YOUR INFORMATION WITH?

We will not share your information for marketing purposes with other companies without your consent.

In order to deliver our services to you effectively we may need to share your Personal Data with third parties such as those that we engage for financial, legal or compliance services as well as product and platform providers.

The categories of third party providers are listed below:

- Insurance Providers
- Advocates
- Government Offices
- Data and Software Service Providers
- Third Party Software Providers

Where third parties are involved in importing or processing your data, we will have an agreement in place with them to ensure the nature and purpose of the processing is clear, that they are subject to a duty of confidence in processing your data and that they will only act in accordance with our written instructions.

To fulfil our obligations in respect of the prevention of money-laundering and other financial crime, we may send your details to third party agencies for identity verification purposes.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

Your Personal Data should not be held for longer than is required under the relevant terms and conditions and policies referenced therein. We are subject to regulatory requirements to retain data for specified minimum periods. In addition, we are obliged to treat our customers fairly in the event of a future complaint and therefore reserve the right to retain data for longer than these specified minimum periods, in order to allow us to investigate such complaints and, if necessary, defend a future claim against us.

Where we do not or no longer provide you with services, we will, not retain Personal Data for longer than:

- 12 months from an initial enquiry where you are a prospective client who does not conduct business with us
- 7 years after our relationship ends with you for investment services

You have the right to request deletion of your Personal Data. We will comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

WHAT RIGHTS DO YOU HAVE OVER THE PERSONAL DATA WE PROCESS?

You have the right to access the information we hold about you. If you would like a copy of some or all of your personal information, please email or write to us using the contact details noted below.

When your Personal Data is processed by automated means, you have the right to ask us to move your Personal Data to another organisation for their use.

We have an obligation to ensure your personal information is accurate and up to date. Please ask us to correct or remove any information you think is incorrect.

Further, you have a right to:

- **Right to withdraw consent:** Where you have given us your consent to use personal information, you can withdraw your consent **at any time**.
- **Access to your personal information:** You can request access to a copy of your personal information.
- **Portability:** You can ask us to provide you or a third party with some of the personal information we hold about you in a commonly used electronic form.
- **Rectification:** You can ask us to change or complete any inaccurate or incomplete personal information held about you.
- **Erasure:** You can ask us to delete your personal information where it is no longer necessary for us to use it, you have withdrawn consent, or where we have no lawful basis for keeping it. Note that we might be required by regulations to retain your information even if you want it to be deleted.
- **Right to object:** You can object to our processing of your personal information.
- **Restriction:** You can ask us to restrict the personal information we use about you where you have asked for it to be erased or where you have objected to our use of it.

MARKETING

We would like to send you information about our services which may be of interest to you. If you've agreed to receive marketing information, you may opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes, please contact us by email at the addresses shown on our website.

COOKIES

We use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser.

WHAT CAN YOU DO IF YOU ARE UNHAPPY WITH HOW YOUR PERSONAL DATA IS PROCESSED?

You have a right to lodge a complaint with the supervisory authority for data protection. In the following email address:

DPO@Olympus...

CHANGES TO OUR PRIVACY POLICY.

We keep our privacy policy under regular review, and we will place any updates on this web page to inform you of any changes when they occur. We will also provide you with a printed copy upon request. This privacy policy was last updated on 01. May 2024.

HOW TO CONTACT US

Please contact us via the contact details on our website if you have any questions about our privacy policy or information, we hold about you.