



BLACKTOWER

FINANCIAL MANAGEMENT GROUP

Privacy Statement



Privacy Statement

Blacktower Financial Management (Cyprus) Limited ('The Company') considers the protection of personal information to be a foundation of customer trust and a sound business practice.

We are committed to protecting your privacy and the confidentiality of any personal information that we collect from you, whether that information is provided in written form, verbally, or over the internet.

The purpose of such a policy is to explain what type of information we collect, how it is used, and with whom and under what circumstances it will be shared. Our Privacy Policy is subject to change and you acknowledge that the Company reserves the right to amend such a policy in the future. Therefore, we encourage you to periodically review our policy statement.

Collection of information

We take great care to protect personal information about you and, when we use it, we do so with respect for your privacy. We collect information about you to provide you with superior customer service, better respond to your needs, maintain and protect your account, process transactions, respond to inquiries, offer and deliver products and services, or to fulfill legal and regulatory requirements. Our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including any of the following: Personal details, details of family members, marital status, employment information and financial situation - Financial needs and objectives (current circumstances, your assets and liabilities, income, expenditure, insurance cover and pension details) - Investment preferences and aversion or tolerance to risk - Any other information which helps build a picture of your particular needs and financial situation.

We will primarily collect your information via our Fact Find. We may also collect information in face-to-face interviews or over the telephone. From time to time, we may collect additional or updated personal information via one or more of these methods.

Protecting your information

Keeping your information secure is one of our most important responsibilities. We maintain physical, electronic, and procedural safeguards that comply with regulations to protect your information and we regularly adapt these controls to respond to changing requirements and advances in technology. We implement strict internal policies against unauthorised disclosure, or use, of client information, and restrict access to personal information to those who require it to develop, support, offer and deliver products and services to you. Even if you are no longer a client, we will treat your information in the same manner as if you were still a client.

Information sharing with third parties

We will not share your information with third parties for use in marketing their products and services to you. Accordingly, you do not need to tell us to refrain from sharing your information with third parties. We may share the information we collect about you with third parties only as permitted or required by law. For example, we may share information: - With service providers to process your requests or provide services regarding a financial product or service you request or authorise (including insurance companies, mutual fund companies, banks and transfer agents which maintain your accounts) - With service providers that assist us with a variety of business activities, including marketing on our behalf, customer service, account administration, online support and research - To protect against or prevent actual or potential fraud, unauthorised transactions, claims or other liability - With government entities, other regulatory bodies, law enforcement officials, internal and external auditors All third parties with whom we share your information are required to protect the confidentiality of the information provided by us and may only disclose such information as permitted by law.

Information sharing within the Blacktower Group

The reason you share your information with us is so that we may use that information to determine whether the investment services we offer are suitable or appropriate for you, and to provide you with recommendations and service for these products and services. In order to accomplish this objective and provide the recommendations and services you request, we may share your information within our Family of Companies to ensure that the recommendations and services we provide consider your complete financial picture and complement each other.

Information collected through cookies

We use Google Analytics to carry out anonymous statistical analysis of page use, page interactions, devices used, default browser languages and geographical locations to evaluate and develop our website.

Making sure your information is accurate You have the right to review the information we have collected about you to ensure that it is accurate and current. You can also request corrections to any personal information maintained by us. There are several options for accessing and, if necessary, correcting your account information. You can review your information independently using your statements, or you may also write to us with your request.