

SIB (CYPRUS) LIMITED

License Number: KEPEY 066/06

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Head office: Alpha Business Center, 1st Floor, Block B, 27 Pindarou Street, CY-1060, Nicosia, Cyprus

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April 2021

SIB (Cyprus) Ltd Privacy Notice

Data Privacy according to GDPR

The protection of your personal data is of great importance to us. SIB (Cyprus) Ltd handles your personal data responsibly and in compliance with all applicable statutory data protection provisions. To provide investment banking services and market trade operations to its clients, SIB (Cyprus) Ltd (“we”, “us” or “our”, “Company”, “SIB”) may collect and process personal data relating to individuals associated with current and prospective corporate clients (which include individuals and representatives/contacts/agents from corporate clients), counterparties, employees, candidates, suppliers and other business partners.

This notice provides information as to how, when and why SIB (Cyprus) Ltd collects and processes personal data within the scope of the Regulation (UE) 2016/679 on the protection of natural persons with regards to the Processing of Personal Data or General Data Protection Regulation (hereinafter “GDPR”) and informs you about your rights under the EU General Data Protection Regulation (“GDPR”) and any law supplementing or implementing the GDPR.

For the purposes of this privacy statement:

- when we refer to “personal data” or “personal information” we mean data/information which identify or may identify you and which may include, for example, your name, address, identification number, telephone number, date of birth, occupation, etc.
- when we refer to “processing” we mean the handling of your personal data by us in any way, including collecting, protecting and storing your personal data.

Please read the following carefully in order to understand our policies and practices regarding your personal data and how we process them.

Responsibilities and contact details

SIB (Cyprus) Ltd is the Data Controller within the meaning of the GDPR and is responsible for the collection and use of your personal data for the purposes described in this Privacy Notice. The Data Protection Local contact of SIB (Cyprus) Ltd can be contacted via email: dataprotection@sib.com.cy and further contact details are outlined in the ‘Contact Information’ section.

Sources of data

SIB (Cyprus) Ltd mainly collects and processes personal data received directly from you in the course of the business relationship and interaction with you. We also process

personal data that we have obtained from publicly accessible sources. Below is a list of ways in which we collect your personal data:

- a. Personal data collected directly from you or via your representative,
 - when you visit SIB or communicate with an SIB's representative over the phone, email, in person outside SIB's offices;
 - when you contact us for any enquiries, complaints or for any other reason.
 - when you visit SIB's affiliated entities or communicate with SIB's authorized representatives from affiliated entities over the phone, email, in person outside SIB's offices.
- b. Personal data collected from publicly accessible sources, including:
 - the internet;
 - the press and the media;
 - public and/or regulatory and/or supervisory authorities including the Registrar of Companies and others;
 - lists and databases maintained by other entities including international organizations.

Our principles

- We will only collect and use your information where we have lawful grounds and legitimate business reasons to do so.
- We will be transparent in our dealings with you and will tell you about how we will collect and use your information.
- If we have collected your information for a particular purpose, we will not use it for anything else unless you have been informed and, where relevant, your permission has been obtained.
- We will only ask for the information that is necessary in relation to the purposes for which we are collecting it.
- We will update our records when you inform us that your details have changed.
- We will regularly review and assess the quality of our information.
- We will implement and adhere to information retention policies relating to your information, and will ensure that your information is securely disposed of at the end of the appropriate retention period.
- We will observe the rights granted to you under applicable privacy and data protection laws, and will ensure that queries relating to privacy issues are promptly and transparently dealt with.
- We will train our staff on their privacy obligations.
- We will ensure we have appropriate physical and technological security measures to protect your information regardless of where it is held.
- We will ensure that when we outsource any processes, the receiver of your personal data has appropriate security measures in place and will contractually require them to comply with these privacy principles.
- We will ensure that suitable safeguards are in place before personal information is transferred to other countries.

Main Purposes of Data Processing and respective Legal grounds

Processing purposes	Legal basis for processing	Data retention <i>(please refer to the section "Retention of personal data" below for the details of the retention period)</i>
Client and counterparty relationship management and account administration (including management of invoices)	<ul style="list-style-type: none"> • Legal obligation • Performance of a contract • Legitimate interests to manage operations and third party relationships and to keep our records updated 	Personal data will be kept for the duration of business relationship (which includes the initiation and execution of a contract) and for further periods in compliance with local regulatory requirements.
Transaction processing, recording of telephone communication, recording of trades, monitoring and reporting activities (e.g. management of client orders, execution of clients' orders, compliance with reporting obligations under MiFID II, EMIR, etc.)	<ul style="list-style-type: none"> • Legal obligation • Performance of a contract • Legitimate interests to provide its services and manage business operations 	Personal data will be kept for the duration of a trade and for further periods in compliance with local regulatory requirements.
Undertaking customer due diligence checks for the prevention, detection, investigation and prosecution of financial crimes (including but not limited to money laundering, terrorism financing, fraud and other financial crimes) in any jurisdiction, identity, verification, sanctions screening	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests to prevent and investigate fraud, money laundering, market abuse, insider dealing and other crimes and to verify the clients/counterparties' identity in order to protect our business 	Personal data will be kept for the duration of business relationship (which includes the initiation and execution of a contract) and for further periods in compliance with local regulatory requirements.
Compliance with applicable local or foreign law, regulation, policy, voluntary codes, directive, judgement or court order, as well as any contractual obligation pursuant to agreements between SIB (Cyprus) Ltd and any	<ul style="list-style-type: none"> • Legal obligation 	Personal data will be kept for the duration of a trade and for further periods in compliance with local regulatory requirements or as

authority, regulator or enforcement agency or body or any request coming from said entities, which it is subject to and cooperating with regulators and law enforcement bodies		directed by any authority, regulator or enforcement agency or body.
Monitoring and recording of communication and activity, including telephone calls, emails and premises security access controls via CCTV cameras	<ul style="list-style-type: none"> • Legal obligation • Legitimate interests for provision of administration and IT services, network and premises security, to prevent fraud and criminal activity. 	Personal data will be kept for the duration of contractual relationship and for further periods in compliance with local regulatory requirements
Recruitment management, personnel management, career management and training provisions (including staff onboarding and offboarding, performance review, payroll and expenses management); management of personnel account dealing and outside business interests)	<ul style="list-style-type: none"> • Legal obligation • Legitimate Interest • Performance of a contract 	Personal data will be kept for the duration of contractual relationship and for further periods in compliance with local regulatory requirements.
Vendor management including vendor selection, vendor screening/assessment, onboarding, offboarding, contract management, vendor performance and invoice payments)	<ul style="list-style-type: none"> • Performance of a contract • Legitimate interests to manage third party relationships and to keep our records updated 	Personal data will be kept for the duration of contractual relationship and for further periods in compliance with local regulatory requirements.

We will only use personal data for the purposes for which we collected it. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that personal data when requested, we may not be able to perform the contract we have or are trying to enter into with you. If we plan to use the personal data provided to us for other purposes than those described above, we will provide information about that processing at the time of collection and obtain your consent prior proceeding with said processing, where needed.

Web tracking of-data

Our website is for information purposes only. We do not use any form of cookies and do not collector process personal information via this website. In particular, we do not gather any data regarding your logging IP address or session information.

Automated decision making

We currently do not use automated decision making in course of initiation or management of our business relationship with you.

How we share your personal data and categories of recipients

We may share your personal data outside SIB under certain circumstances listed below. When we do so, we require those third parties to have appropriate technical and organizational measures in place to protect your personal data. We will not share any of your personal data for any purpose other than the purposes described in this privacy statement.

- We may provide personal data about you to any Sberbank group companies or third parties for the purpose of processing transactions, payments or settlements, or in connection with managing relationships and the provision of products and services. Below are the group companies with whom we may share your personal details: Sberbank CIB's offices located in Moscow, New York, London, also group companies: Sberbank (Switzerland) AG, Zug, Sberbank Europe AG located in Central and Eastern Europe.
- We may need to share your personal data with other credit and financial services or similar institutions to which we transfer personal data to manage the business relationship with you and to assist us on transactions (e.g. custodian banks, payment and settlement infrastructure providers, central counterparties, clearing banks and systems, trading platforms, etc).
- We may have to provide personal data to regulatory, judicial, tax and supervisory authorities to meet our legal obligations, subject to applicable law. Personal data may also be passed to law enforcement agencies if we identify or suspect potential criminal activity or if requested by such authorities
- We may provide personal data to our service providers and agents (including their sub-contractors). This includes (but is not limited to) organizations that perform trade and transaction reporting on our behalf, provide payroll and accounting services, screening tool providers, host our IT systems and data, archive service providers, our legal advisors and auditors, mail or courier services, translation service providers.
- In addition, we may disclose personal data in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganisation, dissolution, or liquidation).

Data transfer within the Group

We may transfer to and store the personal data we collect in countries other than the country in which the personal data was originally collected, including countries outside the European Economic Area ("EEA"), in accordance with applicable law. Those countries may not have the same data protection laws as the country in which the personal data was provided. When we transfer personal data to other countries, we will protect the personal data as described in this Privacy Notice and comply with applicable legal requirements providing adequate protection for the transfer of personal data to countries outside the EEA. This includes by entering into the European Commission's EU Standard Contractual Clauses with the data importer or by implementing Binding Corporate Rules or other Safeguards.

How we store and protect your personal data

We may keep your personal data in different formats including in:

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A CYPRUS INVESTMENT FIRM REGULATED BY THE CYPRUS SECURITIES AND EXCHANGE COMMISSION

- hard copies (for example, of forms that you fill out and submitted),
- digital copies (for example, of hard copies that are scanned into our systems),
- electronic copies (for example, when we input information about you directly on our computers).

We strive to offer you additional security and improve and extend further our security measures regarding your personal data. Such measures include:

- providing constant education and training to our staff on privacy awareness and especially when handling personal data;
- having in place administrative and technical controls to have access controls and system restrictions to data including physical security passes to premises; and
- implementing up to date technological measures, i.e. fire walls and encryption procedures to prevent decoding by unauthorized persons and anti-malware processes.

Retention of personal data

By providing you with products or services, we create records that contain your information, such as customer account records, activity records, tax records, etc.. Records can be held on a variety of media (physical or electronic) and formats.

We retain personal data for as long as necessary to fulfil the purposes for which we collect it, except if required otherwise to retain the personal data for longer for legal, regulatory and fraud prevention purposes. See more detailed description of the retention obligations in the table above.

All records should be kept in accordance with the relevant legal requirements with the option of extending the retention period in accordance with request from the relevant authorities – but at least for **five years** after the execution of the transactions or the termination of the business relationship, with the following exceptions:

- Where an external authority specifically requests that records are kept for a longer period of time; or
- Where financial and other accounting data are required to be kept for tax purposes for a minimum of 7 years after the end of such relationship; or
- Where the documents and data are relevant to ongoing investigations undertaken by an authority, in which case the documents and data should be kept until the authority confirms that the investigation has been completed and the case has been closed.
- In case of an ongoing litigation or any other legal, regulatory or economic reason to extend the storage period, the relevant records shall be retained as long as the respective reason prevails.
- In the event that SIB's license is terminated during the 5-year period, records may be required to be kept for the remainder of the 5 year term.
- CCTV cameras recordings are kept for up to 6 months.

Our legal and regulatory obligations are mainly derived from the following laws and regulations:

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- Cyprus Securities and Exchange Commission Investment Services and Activities and Regulated Markets Law of 2017
- Directive 2014/65/EU of the European Parliament and of the Council of 15 May 2014 on Markets in Financial Instruments
- The Prevention and Suppression of Money Laundering and Terrorist Financing Laws L.188(I)/2007, as amended from time to time
- Companies Law of the Republic of Cyprus

Retention periods may be changed from time to time based on business or legal and regulatory requirements.

Rights of individuals in relation to their personal data

Subject to applicable law, you have the right to request access to the personal data we maintain about you, rectification of your personal data, if it is inaccurate or outdated, or erasure of your personal data in certain circumstances specified in the law. You may also request the restriction of the processing of your personal data or object to that processing on grounds relating to your particular situation. Also subject to applicable law, you have the right to receive a copy of your personal data in a structured, commonly used, machine-readable format, including a right to have that personal data transmitted to another organisation. You have the right to withdraw the consent you gave us with regard to the processing of your personal data for certain purposes.

Please refer to the 'Contact Information' section for details on how to exercise these rights. In order to exercise these rights, we will require proof of identity.

Contact information

Below are the contact details for any queries, additional information or complaints regarding the collection, processing and storing of your personal data or if you wish to exercise any of your rights in respect of the personal data we hold about you/individuals:

Data Protection Local Contact
SIB (Cyprus) Limited
27 Pindarou street
1st floor, block B
1060 Nicosia
Cyprus
Email: dataprotection@sib.com.cy

Complaints

SIB (Cyprus) Ltd is committed to working with individuals to obtain a fair resolution of any complaint or concern about privacy. If, however, individuals believe that we have not been able to assist with their complaint or concern, they have the right to make a complaint to the data protection authority, for more information please visit

<http://www.dataprotection.gov.cy>.

Updates to this privacy statement

We may update or amend the current privacy notice from time to time in order to take account of changes in our business and legal requirements.

When we make changes to this privacy statement, we will amend the revision date at the top of this document. We encourage you to review this statement periodically, so as to be always informed about how we are processing and protecting your personal information.