

PRIVACY STATEMENT

of

MONEIGHT CAPITAL s.r.o.,

ID No.: 06928676, with its registered office at Rybná 716/24, 110 00 Prague 1, Czech Republic, registered in the Commercial Register kept by the Municipal Court in Prague under File No. C 315375 (hereinafter referred to as “we” or “our company”)

Thank you for using the FINEIGHT Platform powered by our company, MONEIGHT CAPITAL s.r.o. In order for us to provide you the best services, we need to collect some of your personal data. Please find below all necessary information what data we use, as well as when, why and how we use them.

As of now, we are processing personal data for two purposes:

- (i) to let you sign up for our FINEIGHT Platform we are about to launch and to keep you informed; and
- (ii) to monitor the traffic on our website www.fineight.com.

1. WHAT PERSONAL DATA DO WE COLLECT?

For the purpose of your registration with the FINEIGHT Platform, we process the following personal data about you:

- a) **E-mail address.** We collect you e-mail address in order to inform you about the launch of the FINEIGHT Platform and on the news and updates on our services.
- b) **Device information.** We collect information about the device and applications you use to access emails sent through our Service, such as your IP address, your operating system, your browser ID, and other information about your system and connection
- c) **Usage Data.** We collect usage data about your interactions with our e-mails sent through the FINEIGHT Platform, which may include dates and times you access our e-mails and your browsing activities (such as what pages are viewed and which emails are opened). We also collect information regarding the performance of our services, including metrics related to the deliverability of e-mails and other electronic communications that we send through the FINEIGHT Platform.

For the purpose of monitoring the traffic on our website, we collect the following personal data about you when you use the website:

- a) **Usage Data.** We collect information about your interactions with the FINEIGHT Platform, which may include dates and times you access our website and your browsing activities (such as what pages are viewed or how long you stay on our website).
- b) **Online identifiers.** These include cookie identifiers, internet protocol addresses and device identifiers and client identifiers.

2. LEGAL BASIS

For the purpose of your registration with the FINEIGHT Platform, we process your personal data based (i) on your consent with contacting you directly via e-mail, and (ii) our legitimate interests. You provide us with your consent by ticking the box that reads “*I agree with providing my e-mail address in order to take part in the FINEIGHT Platform and acknowledge the Privacy Policy*” when submitting your e-mail address.

For the purpose of monitoring the traffic on our website, we process your personal data based on our legitimate interests.

3. SHARING AND DISCLOSURE

In case of your registration with the FINEIGHT Platform, we process your personal data via the Mailchimp service (operated by The Rocket Science Group, LLC) and in case of monitoring of our website, we share your personal data through the Google Analytics (operated by Alphabet Inc.) and Facebook Pixel (operated by Facebook, Inc.) services.

We do not share your personal data with any other third party.

4. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Where you have consented to receive marketing, regardless of whether or not we have a relationship with you, we will retain information we need to market to you for 3 years and 6 months from the date consent was given. Each time you provide your consent, the time period will refresh.

The only exceptions to the periods mentioned above are where:

- a) The law requires us to hold your personal information for a longer period, or delete it sooner;
- b) Where you have raised a legal claim, complaint or concern regarding a product or service offered by us, in which case we will retain your information for a period of 6 years following the date of that complaint or query; or
- c) You exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law.

5. YOUR RIGHTS

Pursuant to the applicable laws, you may exercise any of the rights described in this section. Please note that we may ask you to verify your identity and request before taking further action on your request

5.1 Managing Your Information

You may access and update some of your information through your account settings. You are responsible for keeping your personal information up-to-date.

5.2 Rectification of Inaccurate or Incomplete Information

You have the right to ask us to correct inaccurate or incomplete personal information about you (and which you cannot update yourself within your FINEIGHT Account).

5.3 Data Access and Portability

You are entitled to request certain copies of your personal information held by us. You may also be entitled to request copies of personal information that you have provided to us in a structured, commonly used, and machine-readable format and/or request us to transmit this information to another service provider (where technically feasible).

5.4 Data Retention and Erasure

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our legal obligations. You can request to have all your personal information deleted entirely. Please note that if you request the erasure of your personal information:

- a) We may retain some of your personal information as necessary for our legitimate business interests.
- b) We may retain and use your personal information to the extent necessary to comply with our legal obligations.
- c) Because we maintain the FINEIGHT Platform to protect from accidental or malicious loss and destruction, residual copies of your personal data may not be removed from our backup systems for a limited period of time.

5.5 Withdrawing Consent and Restriction of Processing

If we are processing your personal information based on your consent you may withdraw your consent at any time by terminating your account or by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, you may limit the ways in which we use your personal information, in particular where (i) you contest the accuracy of your personal information; (ii) the processing is unlawful and you oppose the erasure of your personal information; (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or (iv) you have objected to the processing pursuant to Section 6.6 and pending the verification whether the legitimate grounds of our company override your own.

5.6 Objection to Processing

You are entitled to require our company not to process your personal information for certain specific purposes (including profiling) where such processing is based on legitimate interest. If you object to such processing our company will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing or such processing is required for the establishment, exercise or defence of legal claims.

Where your personal information is processed for direct marketing purposes, you may, at any time ask our company to cease processing your data for these direct marketing purposes by sending an e-mail to opt-out@fineight.com.

5.7 Lodging Complaints

You have the right to lodge complaints about our data processing activities by filing a complaint with a supervisory authority, The Office for Personal Data Protection of the Czech Republic, residing at Pplk. Sochora 27, 170 00 Prague 7, Czech Republic.