

## Regarding Circulation of Personal Data

### PRIVACY POLICY

#### Definitions

**Personal data** - any information that directly or indirectly allows the identification of an individual;

**Circulation of personal data** – a system of measures for the collection, processing, handling, transfer, use, and ensuring the protection of personal data;

**Subject of personal data** – an identified or identifiable individual about whom personal data is collected, processed, and protected.

#### Consent for the collection of personal data

As "Unicapital Investment Company" OJSC, we understand that the privacy and security of the personal data you share with us are important. By opening an account with "Unicapital Investment Company" OJSC or using the products, services, and applications provided by our company through all available channels, you consent to the collection and use of your personal data in accordance with the Privacy Policy (hereinafter, the Policy).

This policy applies to individuals who share their personal data with "Unicapital Investment Company" OJSC or use our websites, trading platforms, software, electronic applications, and social media pages.

Please read this Policy carefully to gain a clear understanding of how we collect, use, protect, and process your personal data.

#### How we collect your personal data

We collect and process your personal data by obtaining it from you.

#### What personal data we collect

The data we collect may include, but is not limited to, the following:

- Information provided during the application process for account opening or registration on our websites or application;
- Information provided during the use of any of our electronic applications or websites (this may include your name, date of birth, email address, phone number, tax identification number, etc.);
- Information obtained as a result of transactions carried out through "Unicapital Investment Company" OJSC (applications, purchases, orders, etc.);
- Information obtained from third parties based on legal grounds;

- Information obtained through cookies on the internet (for more details, please refer to the relevant section of this Policy);
- Other information aimed at assisting you during your session and improving the user experience.

### **When we collect the data**

We collect your data when you place an order, carry out trading activities, respond to inquiries or marketing communications, browse our websites, use electronic platforms, websites, and other electronic resources/services, access our newsletters by logging into your account, or enter data on our website and applications.

### **How we use your data**

We may use the data we collect for the following purposes:

- To contact you for the purpose of keeping you informed about the latest updates, announcements, services, products, and technologies;
- To carry out customer inquiries, marketing campaigns, market analysis, and promotions;
- To create a personalized user profile in order to provide a better user session and more effective communication for you;
- To process your transactions quickly;
- To operate our business and/or services, monitor and analyze them, as well as to fulfill our legal obligations and responsibilities;
- To respond to any inquiries or requests that may arise while using our services or when making a data-related request;
- To provide you (or your organization) with investment services, including other services available on our platform and other electronic resources;
- To provide services based on contracts that may be established with you or your organization;
- To respond to your inquiries and contact you afterward;
- To contact you in order to provide a better user session (this may include features, functionalities, and services that may be of interest to you);
- To identify you and confirm your request;
- To carry out monitoring using various analysis and monitoring methods and tools;
- To develop and improve our products and services, and to conduct market research and product analysis;
- To prevent and detect money laundering, terrorism, fraud, and other crimes and/or abuses defined by the applicable legislation;
- To comply with the relevant laws in any country where we conduct business activities (or may do so) or where our products originate from;
- To fulfill our obligations, directly or indirectly, with any tax authority with whom we have a legal relationship, based on any legal and regulatory requirements, including best practices.

In cases where consent is required by law, we will use your data only after obtaining your explicit consent.

We may process your personal data within the framework of one or more of the following legal grounds:

- When processing of data is necessary for the performance of a contract with you or for taking steps prior to entering into such a contract, including executing your relevant instructions;
- To comply with our legal obligations (for example, for the maintenance of records related to social benefits or for tax purposes);
- When processing is necessary for our legitimate interests or the legitimate interests of third parties obtaining your personal data, provided that such interests do not override your interests, fundamental rights, and freedoms.

Additionally, the processing of your data may be carried out based on a direct request made by us and your direct consent.

### **With whom and under what circumstances do we share your personal data**

We do not sell, exchange, or transfer your personal data to third parties. We may share your personal data in the following cases:

- We may share your personal data confidentially with our service providers who are directly related to the services or products we provide to you, for the purpose of delivering such services or products and for other business purposes, in accordance with applicable law and when required;
- If you wish to subscribe to or gain access to any service provided by third parties, we may share your personal data with third-party service providers to the necessary extent for the provision of the requested service (for example, when subscribing to data analysis tools, specific company profiles, market updates, etc.);
- We may disclose and provide information related to you to depositories, exchanges, clearing and settlement systems, or other participants in the relevant system, liquidity providers, custodians, intermediaries, and other parties, but such disclosure should be deemed necessary for the execution, management, and reporting of transactions or for communication regarding such transactions in connection with the provision of our services.
- In accordance with applicable legislation, we may share your personal data with mediation organizations, courts, law enforcement agencies, financial market regulators, lawyers, or other parties for the purpose of preparing claims, defense, or resolving disputes through alternative methods.

Otherwise, we may provide your personal data only if you have granted us permission to do so or in response to inquiries from courts and other competent state authorities, in accordance with applicable legislation.

### **Third-party links**

We do not offer or promote third-party products or services on our website.

## **How we store your personal data**

We take the necessary technical and organizational measures, as required by law, to protect the confidentiality of your personal data and ensure its security in accordance with our internal procedures related to the storage, disclosure, and access to personal data. Your personal data may be stored in our information technology systems, in the systems of our contractors, or on paper-based records.

## **How we protect your data**

In order to make your use of our electronic services, including access to our website, as secure as possible, our electronic services and products are regularly checked for security vulnerabilities and known weaknesses.

We never ask for your credit card number via phone, email, or other similar communication channels. We continuously use appropriate tools to detect malicious software.

Your personal data is stored in secure networks and is only accessible to a limited number of individuals who have special access rights to these systems and are required to maintain the confidentiality of the information.

When a user places an order, enters, submits, or accesses data, we implement a range of security measures to protect the security of personal information.

## **Updating personal data**

We are not responsible for any losses arising from the inaccurate, invalid, incomplete, or insufficient personal data you provide. If there are any changes to the personal data you have provided or if you wish to cancel any request made to us, please notify us by contacting "Unicapital Investment Company" OJSC using the communication channels specified in our agreement with you or by emailing us at [info@unicapital.az](mailto:info@unicapital.az) through your registered account. We will begin processing your request after confirming that it was made by you.

## **How long do we retain your personal data?**

We retain your personal data in an identifiable form in accordance with our internal policies. Your personal data will be retained for as long as necessary to meet legal, regulatory, and business requirements. This period may be extended if required by legislation and/or internal policies.

## **How do we handle spam emails?**

We use the email address to send information, respond to inquiries and/or other requests, or answer questions. We base the following on this:

- Not using fraudulent or misleading subject lines or email addresses;
- Informing recipients about promotional content in an acceptable manner;
- Mention the business address or website address;
- If used, monitoring third-party email marketing services for compliance;
- Processing unsubscribe (cancellation of subscription) requests promptly.

You can contact us via email if you wish to unsubscribe from receiving future emails, and we will promptly remove you from all communications.

## **Use of cookies**

We do not use cookies for tracking purposes. You can choose to have your computer alert you every time a cookie is sent or to block all cookies. This can be done through your browser settings. If your browser is different, you can check the "Help" menu of your browser to properly adjust cookie settings. When cookies are blocked, some features may be deactivated. This will make your website session more efficient, but it may cause some features to not function properly. However, you will still be able to place an order.

## **Children's online privacy protection**

We do not specifically sell products or provide services to individuals under the age of 18. We consider the use of personal data for individuals under the age of 18 to be under the supervision of a parent or guardian.

## **Updating of Privacy Policy**

We reserve the right to update and make changes to this Policy periodically to reflect any changes, such as methods of processing your personal data or changes in legal requirements. If any changes occur we will publish the updated Policy on our website or through other channels. These changes will take effect as soon as they are published on our website or through other channels.

## **Contact us**

If you have any questions regarding this Policy, you can contact us:

Address: 8 November Avenue 15, Baku, Azerbaijan, AZ1025

Email: [info@unicapital.az](mailto:info@unicapital.az)

Phone: 117-5