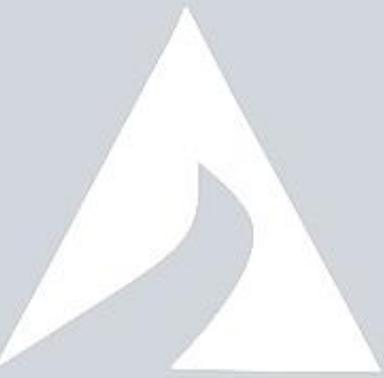


Privacy Policy



Finpath
ADVISORY

This Privacy Policy (“Policy”) sets out the principles governing the collection and processing of personal data by **Finpath Advisory LLC**, a limited liability company incorporated in the State of New Mexico, United States (“Finpath”, “we”, “us”, “our”).

This Policy is intended to comply with:

- Regulation (EU) 2016/679 (“GDPR”)
- UK General Data Protection Regulation (“UK GDPR”)
- Applicable U.S. federal and state privacy standards

All privacy-related communications may be addressed to:
privacy@finpathadvisory.com

1. Data Controller

For the purposes of GDPR and UK GDPR, Finpath Advisory LLC acts as Data Controller in relation to personal data processed in connection with the provision of its financial consulting services.

Finpath Advisory LLC
State of New Mexico, USA
Email: **privacy@finpathadvisory.com**

2. Categories of Personal Data Processed

Finpath may process the following categories of personal data:

(a) Identification and Contact Data

- Full name
- Professional email address
- Company name
- Professional title or role
- Telephone number (if provided)

(b) Client Business and Operational Data

- Financial statements and accounting reports
- Budgeting and forecasting documentation

- Treasury, cash flow or guarantees-related material
- Internal operational documents shared by the client in the context of an engagement

(c) Technical Data

- IP addresses
- Browser and device metadata
- Server logs and basic usage analytics

Finpath does not intentionally collect special categories of personal data as defined in GDPR/UK GDPR. If such data is inadvertently received, it will be handled with additional care and minimized wherever possible.

3. Purposes of Processing

Personal data is processed for the following purposes:

(a) Contract Performance

- Provision of financial consulting, reporting and advisory services
- Communication with clients concerning ongoing projects
- Delivery of analyses, reports and recommendations

(b) Legitimate Interests

- Business administration and internal management
- Maintenance and improvement of IT systems and security
- Prevention of fraud, misuse or unauthorized access

(c) Legal and Regulatory Compliance

- Maintenance of accounting, tax and legal records
- Cooperation with competent authorities where legally required

(d) Consent

- Where applicable for voluntary submissions or optional processes not strictly required by contract or law.

4. Legal Bases for Processing (GDPR / UK GDPR)

Processing of personal data by Finpath is based on one or more of the following legal bases:

- **Article 6(1)(b) GDPR / UK GDPR** – performance of a contract or steps taken at the request of the data subject prior to entering into a contract.
 - **Article 6(1)(f)** – legitimate interests pursued by Finpath or a third party, provided such interests are not overridden by the interests or fundamental rights and freedoms of the data subject.
 - **Article 6(1)(c)** – compliance with legal obligations.
 - **Article 6(1)(a)** – consent, where explicitly obtained and required.
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5. International Data Transfers

Personal data may be processed and stored in:

- The **United States** (primary location of Finpath operations)
- The **European Union**
- The **United Kingdom**

Where transfers of personal data take place from the EU/UK to a third country without an adequacy decision, Finpath will implement appropriate safeguards such as:

- Standard Contractual Clauses (SCCs) adopted by the European Commission or UK authorities
 - Technical and organizational security measures
 - Contractual confidentiality obligations for recipients
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6. Data Retention

Finpath retains personal data only for as long as necessary for the purposes for which it is processed, or as required by applicable laws.

Indicative retention periods:

- Engagement and project documentation: **up to five (5) years** after completion of the engagement, unless longer retention is required or justified.

- Accounting and tax records: retained in accordance with statutory retention periods.
 - General correspondence and contact requests: retained while relevant to the business relationship or the original purpose of collection.
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7. Security Measures

Finpath implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk, including, as appropriate:

- Use of secure storage and encrypted solutions
 - Access control and authentication mechanisms
 - Maintaining confidentiality through internal policies and contractual obligations
 - Secure destruction or anonymization of data when no longer required
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8. Data Sharing and Recipients

Personal data may be shared with the following categories of recipients:

- IT and cloud service providers supporting Finpath's infrastructure
- Email and communications service providers
- Professional advisers (e.g. legal, accounting) where necessary
- Public authorities and regulatory bodies, where required by law or in the context of legal proceedings

Recipients are required to handle personal data in accordance with contractual obligations and applicable data protection laws and must not use the data for their own purposes.

9. Rights of Data Subjects (EU and UK)

Data subjects located in the EU or UK have the following rights under GDPR and UK GDPR:

- **Right of access** – to obtain confirmation and a copy of their personal data.
- **Right to rectification** – to correct inaccurate or incomplete data.
- **Right to erasure** – to request deletion of personal data in certain circumstances.

- **Right to restriction of processing** – to limit processing in specific situations.
- **Right to data portability** – where processing is based on consent or contract and carried out by automated means.
- **Right to object** – to processing based on legitimate interests.

Requests to exercise these rights should be addressed to:

✉ privacy@finpathadvisory.com

Finpath may need to verify the identity of the requester before responding.

10. Rights Under U.S. Privacy Standards

Finpath does not sell personal data.

Depending on applicable U.S. state law, individuals may have rights including:

- Right to request disclosure of personal data held by Finpath
- Right to request correction of inaccurate data
- Right to request deletion of personal data, subject to legal exceptions

Finpath will not discriminate against individuals for exercising privacy rights.

11. Minors

Finpath's services are directed to professional and business clients. Finpath does not knowingly collect or process personal data relating to children or minors.

12. Amendments to this Policy

Finpath may revise this Policy from time to time to reflect changes in legal requirements or in its data processing practices. The most recent version will be made available upon request or through Finpath's usual communication channels.

13. Contact Information

For any questions or concerns about this Policy or Finpath's handling of personal data, please contact:

✉ privacy@finpathadvisory.com

