

PRIVACY POLICY (NOTICE)

1. General Provisions

- 1.1 This notice (hereinafter referred to as the “Notice”) defines the terms of collection, input, systematization, organization, storage, use, alteration, restoration, transfer, rectification, blocking, destruction of personal data, irrespective of the form and mode of implementation of this operations (all the operations together hereinafter referred to as the “processing”) with the personal data of visitors (as well as registering/registered clients, all together hereinafter referred to as the “Client”) of <https://siriuscapital.am/> website (hereinafter referred to as the “Website”), <https://app.siriuscapital.am/> web application and mobile applications (hereinafter referred to as the “Applications”) belonging to "SIRIUS CAPITAL" closed joint-stock company (hereinafter referred to as the “Company”).
- 1.2 This notice applies to any service provided by the Company (hereinafter collectively referred to as “Services”), unless otherwise specified by a different written notice from the Company.
- 1.3 **FROM THE TIME OF ACCEPTING THIS NOTICE, USING THE COMPANY’S SERVICES OR SIGNING A CONTRACT/AGREEMENT WITH THE COMPANY, THE CLIENT HEREBY PROVIDES THEIR UNCONDITIONAL, INFORMED, FREELY GIVEN, AND EXPLICIT CONSENT, INCLUDING BUT NOT LIMITED TO THE COLLECTION AND RETRIEVAL OF THEIR PERSONAL DATA.**
- 1.4 From the time of accepting this notice, using the Company’s services or signing a contract/agreement with the company, the Client **expressly and knowingly consents** to receiving **advertising, promotional, and informational messages** from the Company through **any available means of communication**, including but not limited to email, SMS, mobile push notifications, phone calls, application alerts, or social media platforms.
- 1.5 The Client hereby also unconditionally consents to the transfer of their personal data obtained in accordance with this Notice, as well as other information necessary for the achievement of the purposes set out in Clause 4 of this Notice, **to the service providers of the Company and financial institutions processing electronic payments**, for the purposes of service provision by the Company, execution of relevant payments, instructions/transactions, and ensuring the operation of the Website and Applications.

2. Legal basis for the processing of personal data

The Client’s personal data is processed on the basis of the legislation of the Republic of Armenia, including but not limited to: the Law of the Republic of Armenia “On Personal Data Protection,” the Law of the Republic of Armenia “On the Securities Market,” the Law of the Republic of Armenia “On Combating Money Laundering and Terrorism Financing,” the terms of the relevant services provided by the Company and the respective service application-agreement, or the Client’s consent given otherwise under this Notice.

Data relating to legal entities is processed based on the legislation of the Republic of Armenia, including but not limited to: the Law of the Republic of Armenia “On State Registration of Legal Entities, Separate Subdivisions of Legal Entities, Institutions, and Individual Entrepreneurs.”

3. Processed personal data, the way of its collection

3.1 In order to achieve the objectives set out in paragraph 4 of this Notice, the Client is required to provide the following personal data, supported by relevant documents:

In the case of an individual and an individual entrepreneur: a self-portrait taken in real time (online selfie), an identity document or other official document, exclusively with a photo, which must, at least, include the name, surname, citizenship, registration address (if any) of the person, year, month, date, place of birth, series, number of the identity document, date, month, year of issue, place of residence, bank account details and for an individual entrepreneur - also the registration number and the registration number of the taxpayer.

For the purpose of ensuring compliance with the requirements established by the legislation of the Republic of Armenia, information and supporting documents regarding the residency, marital status, employment, income, and source of income of the Client — as a natural person and/or individual entrepreneur — may also be collected and processed.

In the case of legal entities: a document of state registration or other official document, which must, at a minimum, include the name, location of the legal entity, place of business (if it differs from the location of the legal entity), charter or other similar document, identification number (number of state registration, accounting), if available, the taxpayer registration number, bank account details, the name, surname of the official (member of the body) carrying out the current management of the activity, as well as, data of the representative's identity document, first name, last name, patronymic, date of birth, registration address and/or actual residence, representative's phone number, email address, financial statements of the legal entity.

The information provided must be accurate, up-to-date and reliable, which the Client is responsible for ensuring. The personal data will be processed in the minimum amount necessary to achieve the objectives set out in this Notice.

3.2. When using the Company's online services, the Company's servers also collect technical data of personal use (including IP address, time of access, date of entry, pages visited on the website, the language used, software vulnerabilities), which includes data about the used browsers. This information is essential for the Company to provide services and maintain quality.

3.3. The Company collects the data of the Client exclusively with the consent of the latter, by the following means:

- when filling out the required data for registration on the Website and on the Applications,
- when sending a message from the "Contact Us" section,
- when receiving any personal data stored in the databases of state and local self-government bodies and other persons, in response to a request for personal data from information systems owned by the latters,

- passive collection of personal data about the current connection in terms of statistical information when visiting the Company's Website and Applications (in this case, the information is stored in the cookies section).

3.4 When processing personal data, the Company is guided by the following requirements:

- legality of purposes, means of processing and reliability of data,
- ensuring the legality of personal data processing, which implies data processing with the consent of the subject,
- compliance with real and stated processing goals,
- compliance with the scope and nature of personal data, means and purposes of personal data processing,
- sufficiency of data for processing purposes and inadmissibility of excessive processing of data for processing purposes,
- Notice of users of information systems about the legal and safe practice of handling personal data,
- accuracy, completeness, reliability and security of personal data in information systems,
- informing the subject about the processing of personal data and the legally significant consequences of such processing, giving him the opportunity to influence the accuracy and completeness of this data,
- constant internal control of personal data processing, readiness to undergo state inspections of personal data processing processes and systems.

4. Purposes of processing personal data

The processing of personal data is carried out for the following purposes:

- proper provision of services, improving the quality of customer service,
- to open a customer account, manage this accounts, monitor and detect fraud.
- confirmation of Client's identity (identification),
- organizing various advertising campaigns,
- ensuring the accuracy of Client's personal data (checking, clarification or updating),
- compliance with the requirements of RA legislative acts, in particular, the requirements of Article 16 of the RA Law on Money Laundering and Anti-Terrorism.

5. Existing security assurance measures

To ensure the protection of the processed personal data from unauthorized access, alteration, disclosure or destruction, the Company takes the necessary legal, organizational, technical protection measures in accordance with the legislation of the Republic of Armenia, the requirements of the Company's information security policy and the Company's technical capabilities. The personal data protection system, constantly monitored by Company's employees, consisting of regularly updated elements, is installed on computer equipment within organization and is protected by network and security routers that ensure modern security rules. The Client's

personal data is available to Company's employees only in the volume and within the terms necessary to achieve the goals set in this Notice. The Client's personal data is available to the Company's employees only to the extent and for the periods necessary for the implementation of the purposes set forth in this Notice. Company's employees and other persons who have gained the right to access the processed personal data have signed an obligation not to disclose confidential information, and have been warned of possible disciplinary, administrative, civil and criminal liability in case of violation of the norms and requirements of the current legislation of the Republic of Armenia in the field of personal data processing. In order to protect Client's personal data, the contracts with all our partners who receive information containing personal data must necessarily contain provisions prohibiting the disclosure of confidential information (including personal data).

In cases where personal data is transferred to third-party service providers located outside the Republic of Armenia, including countries without adequate data protection standards, the Company ensures that appropriate safeguards are in place. These may include entering into data protection agreements or standard contractual clauses with recipients to secure the confidentiality and lawful processing of the Client's personal data.

6. Terms of storage of personal data

The Company keeps the Client's personal data for the period that is objectively necessary to process the data to fulfill the purposes set forth in point 4 of this notice. The Company regularly review the terms of storage of personal data in accordance with the requirements of the current legislation of the Republic of Armenia and the Policy adopted by the Company. The company processes only personal data subject to storage in accordance with the legislation of the Republic of Armenia, and personal data necessary to achieve the purposes established in this document, avoiding their repeated processing as much as possible.

7. Client's rights

The Client has the rights determined by the RA Law "On the Protection of Personal Data". The Client has the right to withdraw their consent to the processing of personal data and/or to request the destruction of their personal data by submitting a written request/demand duly signed, or electronically signed using an electronic digital signature. The Company shall cease processing the Client's personal data and destroy such data within ten (10) business days following the date of receipt of the Client's respective request/demand. However, in this case, the Company will cease the provision of the Services. The Client has the right to contact the Company to correct or change their personal data if they are incorrect or need updating. The Client has the right to file a complaint with the Company if they believe that personal data was processed with violation or if they do not agree with the procedure for processing personal data.

The Client has the right to opt out of receiving advertising or non-essential communications from the Company at any time by submitting a relevant request or using the unsubscribe mechanism if available in such message.

In the cases, where the Client's personal data is processed for analytical purposes by third-party providers, including those located in third countries (e.g., Yandex Metrica), the Client may withdraw their consent to such processing by managing cookie settings in their browser or device. The Company provides a mechanism to block such data collection, though this may limit the availability or functionality of certain services.

8. Cookies

8.1 Information stored in the Client's device

When using the Company's services, the Company can store data on the devices used by Clients. This data is called cookies, which are small text files, recording Client's preferences. Cookies help the Company track the use of its Website and Applications, improve its services, making them more understandable and easier to use. The Company also uses Local Shared Objects or Flash cookies. Flash cookies are similar to browser cookies. They allow remembering all the visits of a user to the Company's Website and Applications and present useful advertisements tailored to the Client's needs. Neither cookies nor flash cookies can be used by anyone to access a Client's device or retrieve any other information. The Company uses these methods only to monitor the use of its services.

8.2 Strictly necessary cookies

Strictly necessary cookies provide Clients with the opportunity to navigate the Website, as well as the Applications and use such features as accessing secure areas of the latter's or conducting financial transactions with the help of cookies. Without these cookies, it would not be possible to ensure the efficient functioning of the Website and Applications.

These cookies will store data provided by the Client during the registration process and will help identify the Client as a client and provide necessary services.

The Company's servers use three different types of cookies:

"Session-based" cookies: These cookies are stored on the Client's device only during the visit to the Company's Website and Applications. With session-based cookies, Clients can navigate the Website and Applications faster, and if the Client is a registered user, these cookies can provide information that is most useful for him or her. This type of cookie expires automatically when the Clients close their browser.

"Persistent cookies": These cookies will remain on the Client's device for as long as they are defined for each cookie. Flash cookies are also persistent.

"Analytical cookies": These cookies allow to recognize and count the number of Clients and determine how Clients use the Company's services. This helps improve the performance of Website and Applications by understanding what users need most, tailoring content, and identifying potential areas of improvement.

According to his preferences, the Client can completely refuse cookies, delete cookies already placed on his device, or set up a warning in his browser before a cookies are placed. The Client has the option to accept or reject cookies. Most web browsers automatically accept cookies, but the Client can change the browser settings to refuse cookies.

Most browsers have a "Help" section where the Client can learn how to prevent new cookies from being accepted, how to have the browser notify when a new cookie is received, or how to completely disable all cookies.

8.3 Use of Yandex Metrica and Related Consent

The Company uses **Yandex Metrica**, a web analytics tool, to analyze the interaction of Clients with the Website and Applications. Yandex Metrica collects information such as user behavior, clicks, session duration, technical data (including IP address and device data), and other interaction metrics. This data helps the Company improve user experience, understand the effectiveness of its services, and optimize its digital platforms.

By accepting this Notice and continuing to use the Website or Applications, the Client **expressly and irrevocably consents** to the collection and cross-border transfer of their personal data, including behavioral and technical identifiers, through Yandex Metrica for the aforementioned analytical purposes. This consent includes the processing of personal data in accordance with Yandex's privacy policy: <https://metrica.yandex.com/about/info/privacy-policy> .

8.4 "Flash Cookies"

Clients can change their Flash cookie settings to prevent the use of Flash cookies. The Flash player settings manager allows setting preferences. To prevent the use of cookies from all sides, the Client should select the "General Storage Settings" tab and remove the tick from "Allow third-party Flash content to store data on my device", then close the settings manager. The Client can also change the settings for each individual site they visit through the "Website Storage Settings" tab, which is also located in the settings manager. If the Client is using an old version of Flash Player or an old browser, the settings manager might not be accessible for him.

If the Client blocks cookies, they won't be able to use all the interactive features of the Company's Website and Applications.

9. Validity period of the agreement

- 9.1. This is the Company's complete and only privacy policy (Notice), superseding all previous versions. This Notice, as well as all amendments to it, come into force from the moment they are published on the Company's website and Applications and are applicable to relations with the Company prior

to the entry into force of this Notice. The consent given when accepting this Notice is valid until the termination of any existing legal relationship between the Client and the Company and until the Client's obligations to the Company are fully fulfilled.

- 9.2. The Company has the right to unilaterally change at any time both the technical terms of use of and the provisions of this policy, about which the Company will notify Users by placing it in the relevant section of the Website and Applications.
- 9.3. If the Client continues to use the Company's services, it indicates that they agree to any changes in the privacy policy.
- 9.4. The Company advises to periodically visit the privacy policy section and familiarize oneself with the updates.