

Mantera

Privacy Policy

Protecting your personal information is an important priority for Mantera. This privacy policy is designed to support this objective and, where applicable, to set out how Mantera will process personal information as a Data Controller. Mantera collects non-public personal information provided by you or your representative on applications or other forms connected to Mantera, or through other interactions that you or your representative have with Mantera. We ask you to read this Privacy Policy carefully as it contains important information on who we are, how and why we collect, store, use, and share personal information and on how to contact Mantera and supervisory authorities in the event you have a complaint. This Privacy Policy applies to websites owned and operated by Mantera, as well as to all services provided by Mantera. References to Mantera mean Mantera Trust Capital KB, its agents, successors and assigns.

Mantera does not disclose any non-public personal information about you, except when legally authorized to do so. If you decide to close your account, Mantera will continue to adhere to the privacy policies and practices as described in this notice.

How and Why We Obtain Information?

Mantera may receive non-public personal information about you (the “Personal Information”) from any of the following sources:

- Your applications or forms (for example, name, address, Social Security number, birth date, assets, income, etc.);
- Transactional activity in your account (for example, trading history, balances, etc.);
- Information from consumer reporting agencies;
- Information from other third-party data services (for example, to verify your identity and to better understand your service needs and product);
- Other sources with your consent or with the consent of your broker;

Mantera may process the Personal Information for the following purposes:

- Managing and administrating any accounts you may hold with Mantera on an on-going basis (the “Services”);
- Mantera will itself (or through a third party e.g. credit reference agency) process certain information about you or your company’s directors, officers, employees and beneficial owners (if applicable) in order to carry out anti-money laundering (AML) checks and related actions which Mantera considers appropriate to meet any legal obligations imposed on Mantera relating to the processing in the public interest or to pursue Mantera’s legitimate interests in relation to the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions on an on-going basis, in accordance with Mantera’s AML procedures;
- To report tax related information to tax authorities in order to comply with legal obligations;
- To monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and

to enforce or defend to report tax related information to tax authorities in order to comply with a legal obligation;

- To monitor and record calls and electronic communications for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution, and to enforce or defend Mantera and its affiliates' rights, itself or through third parties to whom it delegates such responsibilities or rights in order to comply with a legal obligation imposed on Mantera, or to pursue Mantera's legitimate interests in relation to such matters or the processing in the public interest;
- To monitor and record calls for quality, business analysis, training and related purposes in order to pursue the legitimate interests of Mantera to improve its service delivery;
- To update and maintain records and for fee billing;
- To carry out statistical analysis and market research;
- To provide you with information about products and services which may be of interest to you or to the institution you represent, and which processing is necessary to perform a relevant contract with you, comply with legal obligations and/or which is necessary for Mantera's legitimate interests indicated above and/or where the processing is in the public interest;
- To retain AML and other records of individuals to assist with subsequent screening of them, including in relation to investment in other funds or the provision of other services by Mantera, to pursue Mantera's and (in some circumstances) its clients' legitimate interests.

How We Protect Information About You

- We take reasonable security measures consistent with applicable law to protect the security of your Personal Information from being accidentally lost, used or accessed in an unauthorized way. We limit access to your personal information to those who have a genuine business need to have it. Such processing of your information will be done only in an authorized manner and is subject to a duty of confidentiality. We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so. We also implement the use of encryption or Secure Socket Layers connections for the transmission of any Personal Information. In so much as personal email is generally not encrypted, we request that no Personal Information be sent to us via email. We will retain your Personal Information as long as your account is active or as long as needed to provide you with our Services. You may, at any time, require from us that Personal Information should be removed. Please be aware that it is not technologically possible to remove each and every record of the information you have provided to Mantera from our servers. We will as well retain the necessary Personal Information in order to comply with legal obligations, resolve disputes and enforce our agreements. User preferences and opt-out choices for Email, Direct Mail, Telemarketing, and Third-Party Sharing. To opt out of:
 - Receiving promotional or marketing emails from Mantera at a specific email address;
 - Receiving direct mails;
 - Receiving calls;
 - Receiving notifications provided as part of the Services;
 - Disclosure of your information to third-parties; and

- Use of your information for a purpose that is materially different from the purpose(s) for which it was originally collected or subsequently authorized. You may:

Contact us by mail at **contact@mantera.net**

How We Share Information About You

We may share the personal information that we collect about our customers, prospects, or former customers with their brokers or with:

- Mantera corporate affiliates, including internal service providers;
- Unaffiliated service providers (for example, printing and mailing companies, liquidity providers, and other entities who may provide services at Mantera's direction);
- Government agencies, other regulatory bodies, and law enforcement officials (for example, for tax purposes or for reporting suspicious transactions);
- To credit reference agencies order to carry out money laundering and identity checks and comply with legal obligations;
- To Mantera affiliates and third party vendors in order to process the data for the legitimate purposes;
- Other organizations, with your consent or as directed by your broker (for example, if you request personalized performance reporting) or as permitted/required by law (for example, for fraud prevention or to respond to a subpoena);
- To competent authorities, courts and bodies as required/requested by law or to affiliates for internal investigations and reporting. The disclosure of personal information to the affiliates and other third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA). Such countries may not have the same data protection laws as your jurisdiction. Mantera has put in place the Standard Contractual Clauses approved by the European Union Commission for such transfers of personal data.

Please, contact **contact@mantera.net** should you require more information on Mantera's international data transfer solution. Our service providers are obligated to keep the personal information we share with them confidential and use it only to provide services specified by Mantera.

Online Privacy

Privacy, security and service in Mantera's online operations are just as critical as in the rest of our business. We use firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your online session and to protect Mantera accounts and systems from unauthorized access. When you interact with us through online channels (for example, websites and mobile applications) owned and controlled by Mantera ("Mantera websites"), Mantera manages personal information in accordance with all practices and safeguards described previously. When you visit Mantera's websites, we may collect technical and navigational information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on Mantera's websites. We use this information for a variety of purposes, such as maintaining the security of your online session, facilitating site navigation, improving Mantera's website design and functionality, and personalizing your experience on Mantera's websites. Additionally, the following policies and practices apply when you are online: Mantera provides information to its clients through electronic means only. These include Email, website and online platform. Kindly note

that a valid Email address is required in order to receive information electronically from Mantera. Mantera provides information through our website which may not be addressed personally to you.

Cookies and similar technologies

We use cookies and similar technologies to support the operation of Mantera websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to Mantera websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Mantera cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout. You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when using the Mantera website, or if you delete cookies, you may experience some inconvenience while using Mantera websites. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device or your online preferences.

Connecting with Mantera on social media sites

Mantera provides experiences on social media platforms that enable online sharing and collaboration among users who have registered to use them. We may collect information you provide by interacting with us via social media, such as photographs, opinions, or Twitter handle. Any content you post, such as pictures, information, opinions, or any personal information that you make available to other participants on these social platforms, is also subject to the Terms of Use and Privacy Policies of those platforms. Please refer to them in order to better understand your rights and obligations with regard to such content.

Mantera mobile applications

Mantera mobile applications ("apps") allow you to access your accounts, trade securities, move money, access third-party news and research using wireless or mobile devices. Our privacy practices apply to any personal information or other information that we may collect through the apps.

Protecting children's privacy online

Mantera websites are not directed to individuals under the age of eighteen (18). Mantera does not intentionally collect information on Mantera websites from those we actually know are under 18, and we request that these individuals do not provide personal information through the sites.

Access to Your Information

You may access and, if necessary, correct your account information through a variety of media offered by Mantera and your broker (e.g., online services and statements) Please contact your broker if you require any additional information.

Data Subject Rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information;
- Right to rectify your personal information;
- Right to restrict the use of your personal information;
- Right to request that your personal information is erased;
- Right to object to processing of your personal information;
- Right to data portability (in certain specific circumstances).

Where you have provided your consent to processing (e.g. to receive information about products and services which may be of interest to you or to the institution you represent), you may withdraw your consent at any time by contacting Mantera by email at **contact@mantera.net** . Where Mantera requires your personal information to comply with AML or other legal requirements, failure to provide this information means Mantera may not be able to provide the Services or the service to the institution you represent. You have the right to lodge a complaint with a supervisory authority.

Additional Information

If you are a former customer, your information is treated in the same manner as the information of current customers. Mantera offers several options for accessing and, if necessary, for correcting your account information. You can review your information using your statements, or through our automated telephone or Internet services. You may also write or call us with your request for information. If we serve you through an affiliate, please contact them directly.

How To Complain

We hope that we can resolve any query or concern you raise about our use of your information. Those in Designated Countries (being the European Union, European Economic Area or Switzerland) may contact our Privacy Office or their country's supervisory authority to lodge a complaint.

For questions or concerns about this Privacy Policy and the information we maintain, or if you like to to instruct us to remove Personal Information, you may contact MANTERA at **contact@mantera.net** .