

Data Protection Notice

Reviewed by: ISO, DPO
Date of next review: 15.04.2027
Approved by BOD: 15.04.2026

1. General information

This Data Protection Notice (the “Notice”) provides detailed information on the principles, conditions, and purposes of personal data and special category personal data processing carried out by WISDOMPOINT CAPITAL LTD (the “Company”), in accordance with Regulation (EU) 2016/679 (“GDPR”)¹.

2. Controller’s Identity and Contact Details

WISDOMPOINT CAPITAL LTD

- Company Registration Number: HE 3307156
- Regulatory Authority: Cyprus Securities and Exchange Commission (CySEC)
- License Number: 219/13 (issued 30 October 2013)
- Registered Address: Andrea Zappa 1, Office 9, 4040 Limassol, Cyprus
- Telephone: +357 25 010750
- Email: info@wisdompointcapital.com
- Website: www.wisdompointcapital.com
- Data Protection Officer (DPO): Ms. Anastasia Chugunova

The DPO can be contacted for matters relating to personal data processing and rights under GDPR.

3. Personal data to be processed

- 3.1. Personal data are processed in relation to natural persons who are clients, potential clients, authorized representatives, decision-makers, directors, beneficial owners, or controlling persons of legal entities (collectively referred to as “data subjects”).
- 3.2. Personal data include all information obtained directly from the data subject, from third parties, or from publicly accessible sources on a lawful basis, including but not limited to:

¹ Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

- Data collected through questionnaires, application forms, and documentation;
- Identification details, contact information, and verification documents;
- Data concerning property, property rights, and liabilities;
- Contractual data (e.g., contract identifiers, terms, and dates);
- Account and transaction data;
- Any updates, amendments, or supplementary information provided after initial collection.

4. Purposes of and legal basis for personal data processing

4.1. Purposes for processing

Personal data are processed for the following purposes:

- 1) Execution and performance of contractual obligations where the data subject is a party;
- 2) Compliance with legal obligations under Union or Member State law, including financial and regulatory requirements;
- 3) Pursuit of legitimate interests by the Company or a third party, including but not limited to:
 - Compliance with international regulatory frameworks;
 - Execution and performance of service-related contracts;
 - Marketing (including direct marketing) of financial products and related services;
 - Risk management, security, and operational integrity;
 - Establishment, exercise, or defense of legal claims.

Processing for purposes other than those outlined above may be undertaken following prior notification to the data subject, and where required, obtaining consent.

4.2. Legal basis for processing

Processing is carried out under one or more of the following legal bases (Article 6 of GDPR):

- 1) Necessity for the performance of a contract or to take pre-contractual measures at the request of the data subject;
- 2) Compliance with legal or regulatory obligations applicable to the Company;
- 3) Pursuit of legitimate interests by the Company or third parties, unless overridden by the data subject's rights and freedoms;
- 4) Consent obtained for one or more specific purposes.

4.3. Data Subject Rights in Cases of Legitimate Interests

Where processing is based on legitimate interests:

- A balancing test is carried out to ensure that such interests are not overridden by data subject rights or freedoms. Information on this assessment is available upon request.

- Data subjects have the right to object, particularly concerning direct marketing activities. Upon objection to direct marketing, processing for that purpose will cease immediately.

5. Processing operations and Methods

Processing operations may include collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, dissemination, alignment, restriction, erasure, or destruction of personal data.

Processing is conducted using automated systems and/or manual processes, with due regard for data protection principles of lawfulness, fairness, transparency, and minimization.

6. Categories of recipients of personal data

6.1. Recipients of personal data may include:

- Financial intermediaries (brokers, custodians, banks, depositaries, and trading venues);
- IT solution providers, trading platforms, and data service providers;
- Regulatory bodies, authorities, and auditors within the EU or in third countries.

6.2. Transfers to third countries not recognized by the European Commission as providing adequate data protection will occur only where appropriate safeguards exist (Articles 44–46 GDPR), including standard contractual clauses, binding corporate rules, or other approved mechanisms.

6.3. In the absence of adequacy or safeguards, transfers may occur under the conditions set out in Article 49 GDPR, with the data subject informed of associated risks (e.g., limited rights enforcement or exposure to unauthorized access).

7. Data subject rights

Data subjects are entitled to exercise the rights described in this section strictly within the scope of the General Data Protection Regulation (GDPR). It should be noted that personal data processing rules applicable in jurisdictions outside the European Union may differ significantly, and data subjects may not enjoy equivalent rights or such rights may be limited in scope.

1) Right to Withdraw Consent

Where the processing of personal data is based on the data subject's consent, the data subject has the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to withdrawal.

To exercise this right, a written notice duly signed by the data subject must be submitted to the Company via fax, post, or delivered in person. A data subject who has provided an email address through a Questionnaire form may also exercise this right by sending a signed electronic copy of the withdrawal notice from the email address specified in the last Questionnaire submitted to the Company. This right may be exercised within **five (5) years** from the termination of the relationship with the Company.

2) Right of Access

Data subjects have the right to obtain confirmation from the Company as to whether or not their personal data are being processed. Where such data are processed, the data subject is entitled to access the personal data, receive a copy of the data undergoing processing, and obtain information concerning the processing activities. Requests submitted electronically will, unless otherwise requested, be responded to in a commonly used electronic format.

3) Right to Rectification

Data subjects have the right to request the rectification of inaccurate personal data without undue delay. Taking into account the purposes of processing, data subjects also have the right to request the completion of incomplete personal data, including by submitting a supplementary statement.

4) Right to Erasure (“Right to be Forgotten”)

Data subjects have the right to request the erasure of personal data without undue delay, and the Company is obliged to erase such data without undue delay where one of the conditions set out in Article 17 of GDPR applies. This right is not applicable where processing is necessary for compliance with a legal obligation, or for other lawful purposes as stipulated in Article 17 of GDPR.

5) Right to Restriction of Processing

Data subjects have the right to request restriction of processing in any of the following circumstances:

- where the accuracy of personal data is contested by the data subject, for a period enabling verification of accuracy
- where the processing is unlawful and the data subject opposes erasure, requesting restriction of use instead;
- where the Company no longer needs the personal data for processing purposes, but the data are required by the data subject for the establishment, exercise, or defense of legal claims;
- where the data subject has objected to processing under Article 21(1) of GDPR, pending verification of whether the Company’s legitimate grounds override those of the data subject.

Where processing is restricted under Article 18 of GDPR, personal data may only be processed, apart from storage, with the data subject's consent or for the establishment, exercise, or defense of legal claims, or for the protection of the rights of another person, or for reasons of important public interest of the Union or a Member State.

6) Right to Data Portability

Data subjects have the right to receive personal data provided to the Company in a structured, commonly used, and machine-readable format, and have the right to transmit such data to another controller without hindrance from the Company, where:

- processing is based on consent under Article 6(1)(a) of GDPR or a contract under Article 6(1) (b) of GDPR; and
- processing is carried out by automated means.

7) Right to Object

Data subjects have the right to object, on grounds relating to their particular situation, at any time to the processing of personal data that is based on Article 6(1)(f) of GDPR (legitimate interests). The Company shall cease processing the personal data unless compelling legitimate grounds for processing are demonstrated which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defense of legal claims.

Where personal data are processed for direct marketing purposes, data subjects have the right to object at any time to such processing, including profiling related to direct marketing. Upon objection, processing for direct marketing purposes shall cease unconditionally.

8) Right to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, data subjects have the right to lodge a complaint with a supervisory authority, particularly in the Member State of habitual residence, place of work, or place of the alleged infringement, if they consider that the processing of personal data relating to them infringes GDPR.

8. Period for which the personal data will be stored

- 8.1. Personal data will be retained for as long as is deemed necessary to fulfill the specific purpose for which it is processed, including retention periods required under applicable legal or regulatory obligations.
- 8.2. In consideration of the general limitation periods established by the laws of Cyprus, and in the absence of any specific regulatory or contractual requirements, the baseline retention period for personal data is **ten (10) years**. Where the same personal data are processed for multiple purposes, the retention period is determined by the purpose that necessitates the longer storage period. In accordance with the **“storage limitation” principle set out in Article 5 of the GDPR**, and taking into account the specific

circumstances related to the data processing, personal data may, in certain cases, be retained for a shorter period than the baseline retention period.

8.3. The primary retention requirements for personal data in connection with the Company's processing activities are as follows:

- Records required under EU and Cyprus laws relating to the provision of investment services – **five (5) years**;
- Records maintained under anti-money laundering and counter-terrorist financing (AML/CTF) legislation – **five (5) years** from the termination of the business relationship with the client or from the execution of the last transaction, whichever occurs later;
- FATCA-related records – **six (6) years**, beginning from the end of the year in which the FATCA status of the client is identified;
- CRS-related records – **six (6) years** from the date of identification of the tax residency of the client or its controlling persons.

9. Information on the Statutory or Contractual Nature of Data Provision, and the Consequences of Non-Compliance

The majority of personal data is collected through the completion of questionnaires and other standard forms. The information requested is often required for multiple purposes.

For instance, the **name of the client** is necessary both for compliance with AML legislation and for the conclusion and execution of contractual obligations. Similarly, the **tax residency of the client** is required to comply with FATCA and CRS obligations, and also to ensure accurate processing of distributions on securities held in the client's account with the Company.

As evidenced by these examples, the same personal data may simultaneously fulfill statutory requirements, contractual obligations, and preconditions necessary for the conclusion or execution of a contract.

Failure to provide the required personal data may result in the Company being unable to enter into, or continue, a contractual relationship with the client.

For any queries regarding the provision of specific personal data or its necessity, clients may contact the Company using the contact details provided in this Notice.

10. Change of terms and Conditions of Data Processing

The Company reserves the right to **unilaterally modify** the terms and conditions of data processing. Any updates or amendments to this Data Protection Notice will be published on the official website: www.wisdompointcapital.com.

Annex 1 to the Data Protection Notice
Purposes of and legal basis for personal data processing of clients (in details)

No.	Personal data/Specific operation	Purpose	Legal basis (in accordance with Article 6 of GDPR)
1	Data as specified in the Questionnaire form and Form W-8BEN, data obtained as a result of the conclusion and performance of the Agreement for provision of investment and ancillary services concluded with the Controller and other agreements and contracts associated with conclusion and performance of the Agreement data on details of the contract, transactions and other operations made via the Controller.	Conclusion/performance of a contract where the Subject is party (Agreement for provision of investment and ancillary services concluded between the Subject and the Controller and other agreements and contracts associated with conclusion and performance of the Agreement).	Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.
2	Personal data as required under the relevant Union law or Member State law to which the Controller is subject.	Compliance with a legal obligation to which the Controller is subject under Union law or Member State law (Prevention of money laundering and financing terrorism legislation; MIFID II, MIFIR, Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and other Union and Member State laws regulating provision of investment services, the exercise of investment activities and the operation of regulated markets, Market Abuse legislation, FATCA and CRS as implemented in Cyprus and Union or Member State laws as may be applicable).	Processing is necessary for compliance with a legal obligation to which the controller is subject under Union law or Member State law.

3.1.	Personal data as required under applicable foreign regulatory requirements/contracts or as nature of the relevant legal claim may require.	Legitimate interests of the Controller or a third party involved in the provision of services to the client (intermediate broker, depositary, custodian, bank) to comply with the foreign regulatory requirements (in particular, laws of the United States of America and Russian Federation concerning taxation of income paid or credited to client's the account, FATCA – US law which has extraterritorial application and where it is applied in the third country to the extent admitted in that third country). Legitimate interests of the Controller to comply with tax laws of the United States of America. Legitimate interests of the Controller and or a third party to conclude and perform the contracts associated with provision of the Controller investment and ancillary services. The aforementioned shall not include cases where procession of personal data under the relevant regulatory requirements/contracts are required for the purpose of conclusion/performance a contract with the Client and consequently such processing falls under legal basis specified in item 2 above. Legitimate interests of the Controller and third parties associated with the establishment, exercise or defence of legal claims (potential legal claims) arisen out of or in connection with provision of services by the Controller.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The legitimate interests are identified in the second column of this table.
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3.2	Contact details	Marketing (including direct marketing) of financial products and services and products and services associated with them (trading platforms, market data services, etc.).	
4	Transfer of the Client's personal data to the third countries which are not recognized by the European Commission as countries ensuring adequate level of personal data protection by adoption a relevant decision for purpose specified in the second column of this table. Personal data to be transferred: personal data as required to provide compliance with FATCA (including but not limited to name, citizenship, address, tax residence, place and date of birth, taxpayer identification number, information regarding account(s) opened with the Company, account(s) balance, income paid or credited to the account(s) with the Company and gross proceed from sale or other distribution of financial assets credited to the account(s) with the Company, taxes withheld from income paid or credited to the account(s) with the Company). Personal data may be transferred in whole or in part by provision of the Self-Certification form contained herein or/and W-8BEN form or by submitting reports on Form 1042-S.	Provision of FATCA compliance by the Company's and any person that has control, receipt, or custody of income or that can disburse or make payments of income (where FATCA applied out of scope of FATCA Intergovernmental Agreement between Cyprus and USA)	The data subject has given consent to the processing of his or her personal data for one or more specific purposes. This legal basis shall not be applicable where the transfer is necessary for the performance of a contract between the data subject and the Company or the implementation of pre-contractual measures taken at the data subject's request or for the conclusion or performance of a contract concluded in the interest of the data subject between the Company and another natural or legal person (e.g. provision of information by the Company to the custodian/depositary where the Client's financial instruments are held or intended to be held). In such cases personal data could be

			transferred irrespective of the Client's consent. The consent given above shall not be applicable where the transfer is necessary for the performance of a contract between the data subject and the Company or the implementation of pre-contractual measures taken at the data subject's request or for the conclusion or performance of a contract concluded in the interest of the data subject between the Company and another natural or legal person (e.g. provision of information by the Company to the custodian/depositary where the Client's financial instruments are held or intended to be held). In such cases personal data could be transferred irrespective of the Client's consent.
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**Purposes of and legal basis for personal data processing of directors, decision-makers, beneficial owners and controlling persons of clients
which are legal persons and representatives of clients**

No.	Personal data/Specific operation	Purpose	Legal basis (in accordance with Article 6 of GDPR)
1	Personal data as required under the relevant Union law or Member State law to which the Controller is subject.	Compliance with a legal obligation to which the Controller is subject under Union law or Member State law (Prevention of money laundering and financing terrorism legislation; MIFID II, MIFIR, Law 87(I)/2017 regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets and other Union and Member State laws regulating provision of investment services, the exercise of investment activities and the operation of regulated markets, Market Abuse legislation, FATCA and CRS as implemented in Cyprus and Union or Member State laws as may be applicable).	Processing is necessary for compliance with a legal obligation to which the controller is subject under Union law or Member State law.

2.1.	Personal data as required under applicable foreign regulatory requirements/contracts or as nature of the relevant legal claim may require.	Legitimate interests of the Controller, a client or a third party to conclude and perform the following contracts: Agreement for provision of investment and ancillary services between the client and the Controller and other agreements and contracts associated with conclusion and performance of the Agreement, Contracts concluded between the Controller and third persons involved in the client's servicing such as brokers, custodians, depositaries, banks, trading venues including third country trading venues, software and market data providers. Legitimate interests of the Controller or a third party involved in the provision of services to the client (intermediate broker, depositary, custodian, bank) to comply with the foreign regulatory requirements (in particular, laws of the United States of America and Russian Federation concerning taxation of income paid or credited to client's the account, FATCA – US law which has extraterritorial explication and where it is applied in the third country to the extent admitted in that third country). Legitimate interests of the Controller and third parties associated with the establishment, exercise or defence of legal claims (potential legal claims) arisen out of or in connection with provision of services by the Controller.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The legitimate interests are identified in the second column of this table.
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2.2.	Contact details	Marketing (including direct marketing) of financial products and services and products and services associated with them (trading platforms, market data services, etc.)	
3	Transfer of the Client's personal data to the third countries which are not recognized by the European Commission as countries ensuring adequate level of personal data protection by adoption a relevant decision without appropriate safeguards. The personal data shall be transferred to the extent necessary for the achievement of the relevant purposes.	Legitimate interests as specified in point 2.1. above except of legitimate interests in relation to legal claims as the transfer for the establishment, exercise or defence of legal claims is allowed under Article 49 of GDPR.	The data subject has given consent to the processing of his or her personal data for one or more specific purposes.

Purposes of and legal basis for personal data processing of donors

No.	Personal data/Specific operation	Purpose	Legal basis (in accordance with Art. 6 of GDPR)
1	Personal data as required under the relevant Union law or Member State law to which the Controller is subject.	Compliance with a legal obligation to which the Controller is subject under Union law or Member State law (Prevention of money laundering and financing terrorism legislation; Market Abuse legislation and other Union or Member State laws as may be applicable).	Processing is necessary for compliance with a legal obligation to which the controller is subject under Union law or Member State law.
2.1.	Personal Data as may be required for the relevant purposes.	Conclusion/performance of a contract where the Client (Donee) is a party (Agreement for provision of investment and ancillary services between the client and the Controller and other agreements and contracts associated with conclusion and performance of the Agreement). Legitimate interests of the Controller and third parties associated with the establishment, exercise or defense of legal claims (potential legal claims) arisen out of or in connection with provision of services by the Controller.	Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party. The legitimate interests are identified in the second column of this table.