

# **Privacy Policy**

### 1. Introduction

JR Global Investments Ltd. (hereinafter "We" or "Us"), as the operator of the online presence of JR Global Investments Ltd. at <a href="https://www.jrglobalinvestments.com">www.jrglobalinvestments.com</a> (hereinafter "our website"), welcomes your interest and visit to our internet pages and mobile applications (collectively referred to as the "online offering"), as well as your interest in our company and services.

Data protection is of particular importance to us. We treat your personal data confidentially and in accordance with the applicable data protection regulations and this privacy policy. The use of our website is generally possible without providing personal data. However, if you wish to utilize specific services offered by our company through our website, the processing of personal data may become necessary. In cases where the processing of personal data is required and there is no legal basis for such processing, we will generally seek your consent.

The processing of personal data, such as your name, address, email address, or telephone number, always takes place in compliance with the General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to us. Through this privacy policy, we aim to inform you about the type, scope, and purpose of the personal data we collect, use, and process, as well as to clarify your rights.

As the responsible party, we have implemented numerous technical and organizational measures to ensure the most comprehensive protection of personal data processed via this website. However, internet-based data transmissions can, in principle, have security vulnerabilities, so absolute protection cannot be guaranteed. For this reason, you are free to transmit personal data to us through alternative means, such as by phone or postal mail.

Our website may incorporate services provided by companies based in the United States of America (USA). When these services are active, your personal data may be transferred to the servers of these respective companies. We would like to point out that the USA is not considered a secure third country under EU data protection law. US companies may be legally obligated under US law to disclose personal data to security authorities without the possibility of legal recourse for affected individuals. Therefore, it cannot be ruled out that US authorities may process, evaluate, and permanently store your data located on servers of US companies for monitoring purposes, regardless of the server's location. We have no control over these processing activities and limit the use of your personal data in connection with the use of our online offering to the specific scenarios described in this privacy policy.

### 2. Responsible Party

Responsible Party as defined by GDPR is:

JR Global Investments Ltd. C/O Knox & Eames Badgemore Park Henley-On-Thames, Oxon, England



RG9 4NR

Email: pricvacy@jrglobalinvestments.com Website: www.jrglobalinvestments.com

Represented by Jonathan Main.

### 3. Data Protection Officer

For suggestions and complaints regarding the processing of your personal data, we recommend contacting our Data Protection Officer:

JR Global Investments Ltd. Privacy Officer C/O Knox & Eames Badgemore Park Henley-On-Thames, Oxon, England RG9 4NR

Or via email at: <a href="mailto:pricvacy@jrglobalinvestments.com">pricvacy@jrglobalinvestments.com</a>

### 4. Definitions

The privacy policy is based on the terminology used by the European legislator when the GDPR was enacted. Our privacy policy is intended to be easily readable and comprehensible for both the general public and our customers and business partners. To ensure this, we would like to explain the terms used in advance.

In this privacy policy, we use the following terms:

# 4.1. Personal Data

Personal data refers to any information relating to an identified or identifiable natural person (hereinafter referred to as the "data subject"). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or one or more specific characteristics that express the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

# 4.2. Data Subject

A data subject is any identified or identifiable natural person whose personal data is processed by the data controller.

# 4.3. Processing

Processing refers to any operation or set of operations which is performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction.

### 4.4. Restriction of Processing



Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

### 4.5. Profiling

Profiling refers to any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular, to analyse or predict aspects concerning job performance, economic situation, health, personal preferences, interests, reliability, behaviour, location, or movements of that natural person.

### 4.6. Pseudonymization

Pseudonymization is the processing of personal data in a way that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data is not attributed to an identified or identifiable natural person.

#### 4.7. Data Controller

The data controller or controller for processing is the natural or legal person, authority, agency, or other body which alone or jointly with others determines the purposes and means of the processing of personal data. Where the purposes and means of such processing are determined by Union law or the law of the Member States, the data controller or the specific criteria for their nomination may be provided for by Union law or the law of the Member States.

#### 4.8. Processor

A processor is a natural or legal person, public authority, agency, or other body that processes personal data on behalf of the controller.

# 4.9. Recipient

A recipient is a natural or legal person, public authority, agency, or another body to which personal data is disclosed, whether a third party or not. However, authorities that may receive personal data in the context of a particular inquiry in accordance with Union or Member State law shall not be considered recipients.

### 4.10. Third Party

A third party is a natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

# 4.11. Consent

Consent is any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data concerning him or her.

# 5. Legal Basis for Processing



Article 6(1)(a) of the GDPR serves as the legal basis for processing operations for which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, when processing operations are required for the delivery of goods or the provision of another service or consideration, the processing is based on Article 6(1)(b) of the GDPR. The same applies to such processing operations which are necessary for carrying out precontractual measures, for example in the case of inquiries concerning our products or services.

If our company is subject to a legal obligation by which processing of personal data is required, such as for the fulfilment of tax obligations, the processing is based on Art. 6(1)(c) of the GDPR.

In rare cases, the processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if a visitor were injured in our company and his name, age, health insurance data, or other vital information would have to be passed on to a doctor, hospital, or other third party. Then the processing would be based on Art. 6(1)(d) of the GDPR.

Finally, processing operations could be based on Article 6(1)(f) of the GDPR. This legal basis is used for processing operations that are not covered by any of the aforementioned legal grounds if processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject. Such processing operations are particularly permissible because they have been specifically mentioned by the European legislator. He considered that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Sentence 2 of the GDPR).

#### 6. Data Transmission to Third Parties

We do not transmit your personal data to third parties for purposes other than those listed below.

We only disclose your personal data to third parties when:

- 1. You have given explicit consent under Art. 6(1)(a) of the GDPR.
- 2. Disclosure is permissible under Art. 6(1)(f) of the GDPR for the protection of our legitimate interests, and there is no reason to believe that you have an overriding interest worthy of protection in not disclosing your data.
- 3. There is a legal obligation for disclosure under Art. 6(1)(c) of the GDPR.
- 4. Disclosure is legally permissible and necessary for the performance of contractual relationships with you under Art. 6(1)(b) of the GDPR.

To protect your data and potentially facilitate data transfers to third countries (outside the EU/EEA), we have entered into agreements for data processing based on the standard contractual clauses of the European Commission.

This website is hosted by an external service provider (host). Personal data collected on this website is stored on the host's servers. This may include IP addresses, contact requests, meta and communication data, contract data, contact details, names, website access, and other data generated via the website.



The use of the host is for the purpose of fulfilling our contract obligations towards our potential and existing customers (Art. 6(1)(b) GDPR) and in the interest of providing a secure, fast, and efficient online offering by a professional provider (Art. 6(1)(f) GDPR).

Our host will only process your data to the extent necessary to fulfil its obligations and will follow our instructions regarding this data.

We use the following hosts:

#### Domain:

Wix.Com Germany GmbH Karlplatz 7, 10117 Berlin, Germany

#### **Hosting:**

Wix.Com Germany GmbH Karlplatz 7, 10117 Berlin, Germany

Furthermore, we engage service providers for tasks such as marketing services, programming, data hosting, and hotline services. We have carefully selected these service providers and regularly monitor them, especially their responsible handling and securing of the data they store. All service providers are bound by us to confidentiality and compliance with legal requirements.

# **Contracts for Data Processing**

To ensure data protection-compliant processing, we have concluded contracts for data processing with the service providers we have engaged.

### 7. Technology

### 7.1. SSL/TLS Encryption

This site uses SSL/TLS encryption to ensure data processing security and protect the transmission of confidential content, such as orders, login data, or contact requests that you send to us as the operator. You can recognize an encrypted connection by the fact that the address line of the browser changes from "http://" to "https://" and by the lock symbol in your browser line.

We use this technology to protect your transmitted data.

# 7.2. Data Collection When Visiting the Website

When using our website for informational purposes only, i.e., if you do not register or otherwise provide us with information, we only collect data that your browser sends to our server (in server log files). With every visit to a page on our website, our web server automatically collects a series of general data and information. This general data and information are stored in the server's log files. The following data can be recorded:

- 1. Browser types and versions used
- 2. The operating system used by the accessing system
- 3. The website from which an accessing system reaches our website (so-called referrers)
- 4. The sub-websites that are accessed via an accessing system on our website
- 5. The date and time of access to the website



- 6. An abbreviated internet protocol address (anonymized IP address)
- 7. The internet service provider of the accessing system

We do not draw any conclusions about the data subject when using this general data and information. Instead, this information is needed to:

- 1. Correctly deliver the content of our website
- 2. Optimize the content of our website and its advertising
- 3. Ensure the long-term viability of our IT systems and the technology of our website
- 4. Provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyberattack

This data and information is evaluated statistically by us on the one hand and, on the other hand, with the aim of increasing data protection and data security in our company in order to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

The legal basis for data processing is Art. 6(1)(f) GDPR. Our legitimate interest follows from the data collection purposes listed above.

#### 8. Cookies

### 8.1. General Information About Cookies

We use cookies on our website. These are small files that your browser automatically creates and that are stored on your end device (laptop, tablet, smartphone, etc.) when you visit our site.

The cookie stores information that results in each case in connection with the specific end device used. However, this does not mean that we are immediately aware of your identity.

The use of cookies serves on the one hand to make the use of our offer more pleasant for you. We use so-called session cookies to recognize that you have already visited individual pages on our website. These are automatically deleted after you leave our page.

In addition, we also use temporary cookies to optimize user-friendliness, which are stored on your end device for a certain fixed period of time. If you visit our site again to use our services, it is automatically recognized that you have already been with us and which entries and settings you have made so that you do not have to enter them again.

On the other hand, we use cookies to statistically record the use of our website and to evaluate it for the purpose of optimizing our offer for you. These cookies enable us to automatically recognize that you have already been with us when you visit our site again. These cookies are automatically deleted after a defined period of time.

# 8.2. Legal Basis for Using Cookies

The data processed by cookies that are necessary for the proper functioning of the website are thus required to protect our legitimate interests and those of third parties pursuant to Art. 6(1)(f) GDPR.

For all other cookies, you have given your consent for this through our opt-in cookie banner in accordance with Art. 6(1)(a) GDPR.



#### 8.3. CookieBot

For the management of cookies and similar technologies (tracking pixels, web beacons, etc.) and related consents, we use the "CookieBot" consent tool. Details on how " CookieBot " works can be found at <a href="https://www.cookiebot.com/goto/cookie-declaration/">https://www.cookiebot.com/goto/cookie-declaration/</a>

The legal bases for processing personal data in this context are Art. 6(1)(c) GDPR and Art. 6(1)(f) GDPR. Our legitimate interest is the management of the cookies and similar technologies used and related consents.

The provision of personal data is neither legally nor contractually required, nor is it necessary to conclude a contract. You are not obliged to provide the personal data. If you do not provide the personal data, we will not be able to manage your consents.

# 9. Content of Our Website

### 9.1. Data Processing for Account Opening and Contract Processing

Pursuant to Art. 6(1)(b) GDPR, personal data is collected and processed when you provide it to us for the purpose of contract performance or when opening a customer account. The specific data collected can be found in the respective input forms. You can delete your customer account at any time and it can be done by sending a message to the address of the Responsible Party mentioned above. We store and use the data you provide for contract processing. After complete processing of the contract or deletion of your customer account, your data will be blocked in consideration of tax and commercial retention periods and deleted after expiry of these periods, unless you have expressly consented to further use of your data or we reserve the right to use data beyond that, which is permitted by law and about which we will inform you below.

### 9.2. Contact / Contact Form

In the course of contacting us (e.g., via contact form or email), personal data is collected. The data collected in the case of a contact form can be seen from the respective contact form. This data is used exclusively for the purpose of answering your request or for contacting you and the associated technical administration. The legal basis for processing the data is our legitimate interest in responding to your request pursuant to Art. 6(1)(f) GDPR. If your contact is aimed at concluding a contract, the additional legal basis for processing is Art. 6(1)(b) GDPR. Your data will be deleted after the final processing of your inquiry, which is the case if it can be inferred from the circumstances that the matter in question has been conclusively clarified and provided there are no legal obligations to retain data to the contrary.

# 10. Newsletter Distribution

# 10.1. Newsletter Distribution to Existing Customers

If you have provided us with your email address when purchasing goods or services, we reserve the right to regularly send you offers for similar goods or services from our range by email. In this regard, we do not need to obtain separate consent from you in accordance with § 7(3) of the Unfair Competition Act. Data processing in this respect is solely based on our legitimate interest in personalized direct marketing in accordance with Art. 6(1)(f) of the General Data Protection Regulation (GDPR). If you initially objected to the use of your email address for this purpose, we will not send you any emails. You have the right to object to the use of your email address for the aforementioned advertising purpose at any time, with effect for the future, by notifying the data



controller mentioned at the beginning. For this, you will only incur transmission costs according to the basic rates. Upon receipt of your objection, the use of your email address for advertising purposes will be discontinued immediately.

# 10.2. Advertising Newsletter

On our website, you have the option to subscribe to our company's newsletter. The personal data that is transmitted to us when ordering the newsletter can be found in the input form used for this purpose.

We regularly inform our customers and business partners about our offers through a newsletter. You can generally only receive our company's newsletter if:

- 1. You have a valid email address; and
- 2. You have registered for newsletter delivery.

For legal reasons, a confirmation email in the double opt-in procedure will be sent to the email address you first registered for newsletter delivery. This confirmation email serves to verify whether you, as the owner of the email address, have authorized receipt of the newsletter.

When registering for the newsletter, we also store the IP address assigned by your internet service provider (ISP) to your IT system at the time of registration, as well as the date and time of registration. The collection of this data is necessary to be able to trace any potential misuse of your email address at a later date and therefore serves our legal protection.

The personal data collected as part of newsletter registration will be used exclusively for sending our newsletter. Subscribers to the newsletter may also be informed by email if this is necessary for the operation of the newsletter service or for registration, as may be the case in the event of changes to the newsletter offering or changes in technical circumstances. The personal data collected as part of the newsletter service will not be shared with third parties. You can unsubscribe from our newsletter at any time. The consent to the storage of personal data that you have given us for newsletter delivery can be revoked at any time. There is a corresponding link in every newsletter for the purpose of revoking consent. Furthermore, you have the option to unsubscribe from newsletter delivery directly on our website or to inform us of your decision in another way.

The legal basis for data processing for the purpose of newsletter distribution is Art. 6(1)(a) of the GDPR.

# 11. Our Activities on Social Networks

In order to communicate with you and inform you about our services on social networks, we maintain our presence on these platforms. When you visit one of our social media pages, we are jointly responsible, along with the provider of the respective social media platform, for the processing operations involving personal data, in accordance with Article 26 of the GDPR.

Please note that we are not the primary provider of these pages but use them within the framework of the options provided to us by the respective platform providers.

Therefore, we would like to inform you in advance that your data may also be processed outside the European Union or the European Economic Area. This use may pose data protection risks for



you, as the protection of your rights, such as the right to information, deletion, objection, etc., may be more difficult, and processing in social networks often occurs directly for advertising purposes or for the analysis of user behaviour by the providers, without our influence.

The described processing of personal data is carried out in accordance with Article 6(1)(f) of the GDPR, based on our legitimate interest and the legitimate interest of the respective provider in communicating with you in a contemporary manner and informing you about our services. If, as a user, you are required to give your consent for data processing by the respective providers, the legal basis is Article 6(1)(a) of the GDPR in conjunction with Article 7 of the GDPR.

As we do not have access to the data held by the providers, we would like to point out that you can exercise your rights (e.g., the right to information, correction, deletion, etc.) best directly with the respective provider. Further information on the processing of your data in social networks and the possibility to exercise your right of objection or revocation (so-called opt-out) can be found below with the respective social network provider:

### 11.1. LinkedIn

Joint Data Controller for Data Processing in Europe: LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland

Privacy Policy:

https://www.linkedin.com/legal/privacy-policy

Opt-Out and Advertising Settings:

https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out

#### 11.2. Microsoft

Joint Data Controller for Data Processing in Europe:

Microsoft France, 39 quai du Président Roosevelt, 92130, Issy-les-Moulineaux, France

Privacy Policy:

https://privacy.microsoft.com/en-gb/privacystatement

**Opt-Out and Advertising Settings:** 

https://go.microsoft.com/fwlink/?LinkID=286759

# 12. Web Analytics

### 12.1. Wix Website Statistics

This website utilizes "Wix Website Statistics" to statistically analyse visitor traffic. The provider is Wix.Com Germany GmbH, Karlplatz 7, 10117 Berlin, Germany

WordPress Statistics uses technologies that enable user recognition for the purpose of analysing user behaviour (e.g., cookies or device fingerprinting). WordPress Statistics collects log files (referrer, IP address, browser, etc.), the origin of website visitors (country, city), and their actions on the site (e.g., clicks, views, downloads) for analysis. Your IP address is anonymized after processing and before storage. The use of this analytics tool is based on Art. 6(1)(f) GDPR. The website operator has a legitimate interest in the anonymized analysis of user behaviour to optimize both its website offering and advertising. If consent is requested for such processing (e.g.,



consent to store cookies), the processing is based solely on Art. 6(1)(a) GDPR and can be revoked at any time.

### 13. Advertising

### 13.1. Google Ads

Our website uses the features of Google Ads to advertise this website in Google search results and on third-party websites. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). For this purpose, Google places a cookie on your device's browser, which automatically enables interest-based advertising based on the pages you visit, using a pseudonymous cookie ID.

These processing activities only occur with your explicit consent, in accordance with Art. 6(1)(a) GDPR.

Further data processing will only take place if you have agreed with Google that your internet and app browser history will be linked to your Google account and information from your Google account will be used to personalize ads you see on the web. If you are logged into your Google account while visiting our website, Google will use your data along with Google Analytics data to create and define target audience lists for cross-device remarketing. Your personal data is temporarily linked with Google Analytics data to create these target audiences.

You can permanently disable the setting of cookies for ad preferences by downloading and installing the browser plugin available at the following link: <a href="https://www.google.com/settings/ads/onweb/">https://www.google.com/settings/ads/onweb/</a>

Alternatively, you can inform yourself about the setting of cookies and make choices through the Digital Advertising Alliance at <a href="https://youradchoices.com/">https://youradchoices.com/</a>. Finally, you can configure your browser to notify you about the setting of cookies and individually decide whether to accept them or reject them in specific cases or generally. If cookies are not accepted, the functionality of our website may be limited.

For more information and Google's privacy policies related to advertising, please see: https://www.google.com/policies/technologies/ads/

### 14. Plugins and Other Services

# 14.1. LinkedIn

We have integrated components of the LinkedIn Corporation on this website. LinkedIn is an internet-based social network that enables users to connect with existing business contacts and establish new business connections.

LinkedIn is operated by LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, USA. For privacy matters outside the USA, LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible.

With each individual retrieval of our website, which is equipped with a LinkedIn component (LinkedIn plugin), this component causes the browser you are using to download a corresponding representation of the LinkedIn component. More information about LinkedIn plugins can be found at <a href="https://developer.linkedin.com/plugins">https://developer.linkedin.com/plugins</a>. As part of this technical process, LinkedIn becomes aware of which specific subpage of our website you are visiting.



If you are simultaneously logged into LinkedIn, LinkedIn recognizes with each visit to our website and during the entire duration of your stay on our website which specific subpage of our website you are visiting. This information is collected by the LinkedIn component and associated with your LinkedIn account. If you activate one of the LinkedIn buttons integrated on our website, LinkedIn associates this information with your personal LinkedIn user account and stores and processes this personal data.

LinkedIn always receives information via the LinkedIn component that you have visited our website whenever you are logged in to LinkedIn at the same time as you access our website, regardless of whether you have clicked on the LinkedIn component or not. If you do not want this information to be transmitted to LinkedIn, you can prevent the transmission by logging out of your LinkedIn account before accessing our website.

LinkedIn offers the option to unsubscribe from email messages, SMS messages, and targeted ads, as well as manage ad settings at <a href="https://www.linkedin.com/psettings/guest-controls.">https://www.linkedin.com/psettings/guest-controls.</a> LinkedIn also uses partners such as Quantcast, Google Analytics, BlueKai, DoubleClick, Nielsen, Comscore, Eloqua, and Lotame, which may set cookies. Such cookies can be rejected at <a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>. The applicable privacy policies of LinkedIn can be found at <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>. LinkedIn's cookie policy is available at <a href="https://www.linkedin.com/legal/cookie-policy">https://www.linkedin.com/legal/cookie-policy</a>.

# 15. Your Rights as a Data Subject

# 15.1. Right to Confirmation

Pursuant to Art. 13 and 14 GDPR, you have the right to request confirmation from us as to whether personal data concerning you is being processed.

### 15.2. Right to Information

Pursuant to Art. 15 GDPR, you have the right to obtain from us at any time, free of charge, information about the personal data stored about you, as well as a copy of this data in accordance with legal requirements.

# 15.3. Right to Rectification

pursuant to Art. 16 GDPR, you have the right to request the correction of inaccurate personal data concerning you. Furthermore, you have the right to request the completion of incomplete personal data, taking into account the purposes of processing.

# 15.4. Right to Erasure

pursuant to Art. 17 GDPR, you have the right to request that the personal data concerning you be deleted without delay, provided that one of the legally provided grounds applies and the processing or storage is not required.

# 15.5. Right to Restriction of Processing

Pursuant to Art. 18 GDPR, you have the right to request us to restrict processing if one of the legal conditions is met.

# 15.6. Right to Data Portability



pursuant to Art. 20 GDPR, you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another controller without hindrance from us, provided that the processing is based on consent pursuant to Art. 6 para. 1 GDPR or Art. 9 para. 2 GDPR or on a contract pursuant to Art. 6 para. 1(b) GDPR and the processing is carried out by automated means, unless the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

Furthermore, when exercising your right to data portability pursuant to Art. 20 para. 1 GDPR, you have the right to have personal data transmitted directly from one controller to another, where technically feasible and provided that this does not affect the rights and freedoms of others.

## 15.7. Right to Object

pursuant to Art. 21 GDPR, you have the right to object at any time, for reasons arising from your particular situation, to the processing of personal data concerning you that is carried out on the basis of Art. 6 para. 1 (e) (data processing in the public interest) or (f) (data processing on the basis of a balance of interests) GDPR.

This also applies to profiling based on these provisions within the meaning of Art. 4 No. 4 GDPR.

If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms, or the processing serves to assert, exercise, or defend legal claims.

In individual cases, we process personal data for direct marketing purposes. You may object to the processing of personal data for such advertising purposes at any time. This also applies to profiling, insofar as it is associated with such direct marketing. If you object to us processing your personal data for the purposes of direct marketing, we will no longer process the personal data for these purposes.

You also have the right to object to the processing of personal data concerning you, which we carry out for scientific or historical research purposes or for statistical purposes pursuant to Art. 89 para. 1 GDPR, for reasons arising from your particular situation, unless such processing is necessary for the performance of a task carried out in the public interest.

You are free to exercise your right to object in relation to the use of information society services, notwithstanding Directive 2002/58/EC, by means of automated procedures using technical specifications.

# 15.8. Revocation of Consent to Data Processing

You have the right to withdraw your consent to the processing of personal data at any time with effect for the future.

# 15.9. Complaint to a Supervisory Authority

You have the right to lodge a complaint with a supervisory authority responsible for data protection about our processing of personal data.

# 16. Routine Erasure, Blocking, and Storage of Personal Data



We process and store your personal data only for the period necessary to achieve the purpose of storage or as required by the laws to which our company is subject.

When the purpose of storage no longer applies or a legally prescribed storage period expires, the personal data is routinely blocked or deleted in accordance with legal regulations.

# 17. Duration of Storage of Personal Data

The criterion for the duration of storage of personal data is the respective statutory retention period. After the expiry of the period, the relevant data is routinely deleted, provided it is no longer necessary for the performance of the contract or the initiation of the contract.

# 18. Objection to Unsolicited Advertising

The use of contact data published within the framework of the legal notice obligation for the transmission of not expressly requested advertising and information materials is hereby contradicted. We expressly reserve the right to take legal action against unsolicited sending of advertising information, such as spam emails.

# 19. Up-to-Date and Amendment of Privacy Policy

This privacy policy is currently valid and dated October 2023.

Due to the further development of our online services or changes in legal or regulatory requirements, it may be necessary to amend this privacy policy. The current privacy policy can be accessed and printed at any time on the website at <a href="https://www.jrglobalinvestments.com">www.jrglobalinvestments.com</a>

| VERSION CONTROL  |                |
|------------------|----------------|
| Created          | September 2023 |
| Finalised        | October 2023   |
| Scheduled Review | October 2024   |