

1. About the Privacy Policy

- 1.1. This is the Privacy Policy (hereinafter referred to as "Privacy Policy") of INTERCAPITAL securities Ltd., an investment company with its registered seat at Zagreb, Masarykova 1, PIN: 68481874507 (hereinafter: "Company" or "We"). In this respect, the Company is acting as the controller of your personal data.
- 1.2. The Privacy Policy applies to investors and customers to whom the Company provides investment services and activities and auxiliary services, as well as to persons who intend to become a client of the Company (hereinafter referred to as "Clients" or "You") and to the persons who represent the Client.
- 1.3. This Privacy Policy also applies to persons who have agreed to be contacted by the Company.
- 1.4. The Privacy Policy regulates the procedures for privacy and protection of your personal data and it applies only to natural persons and their personal data, respectively.
- 1.5. This version of the Privacy Policy is applicable from May 25, 2018. Please note that the Privacy Policy in the paper copy does not necessarily correspond to the current version. Therefore, we always recommend reading the current version available on the Company's web site www.intercapital.hr in the section *Our Business*.
- 1.6. If you have any questions or requests regarding treatment or protection of your personal data, please contact us by e-mail to: data.protection@intercapital.hr or by post to the Company's address, via form provided for that matter available on our website www.intercapital.hr. See the details below in point 8 of the Privacy Policy.

2. Which personal data do We process?

- 2.1. We process solely the personal data that you provided by filling our Client Questionnaire or in an agreement (whether directly to us or to our tied agents), personal data that you provided to us during our communication (by telephone, e-mail, etc.) and personal data derived from our business cooperation.
- 2.2. We process your following personal data:
 - 2.2.1. Your identification data (such as name, surname, PIN, data about your identification document and other data required in our Questionnaire)
 - 2.2.2. Your contact information
 - 2.2.3. Additional data required for or the purpose of our business activities (such as data on your bank account, financial position and other data required in the Questionnaire)
 - 2.2.4. Data about political exposure
 - 2.2.5. Tax residency data
 - 2.2.6. Data deriving from our business cooperation (such as Your transactions and financial data)
 - 2.2.7. Change history of all the aforementioned data
- 2.3. If you have given your consent to contact You, we process your following personal data:
 - 2.3.1. Your contact information (name, surname, e-mail address, IP address).

3. Why we process Your personal data?

- 3.1. Your personal data it being processed because you are a client of the Company or you intend to become a client of the Company and when trading for our own account.
- 3.2. Your personal data is being processed for the following purposes:
 - 3.2.1. Entering into a contractual relationship for the purpose of providing investment services
In order for us to be able, at your request, to enter into agreements for the provision of brokerage services, custody services, investment banking or production of the investment research and financial analysis. In that case, the basis for processing of Your personal data is the conclusion of such agreements;
 - 3.2.2. Fulfilment of contractual obligations
In order for us to be able to fulfil our contractual obligations. In that case, the basis for processing of Your personal data is the implementation of such agreements;
 - 3.2.3. Fulfilment of legal obligations
In order for us to be able to fulfil our legal obligations as an investment company (mainly our reporting obligations and client check). In that case, the basis for processing of Your personal data is the fulfilment of our legal obligations;
 - 3.2.4. Systemic information
In order for us to inform You about the status of each order, performance of service or similar information, for the purpose of providing you with complete information. In that case, the basis for processing of Your personal data is our legitimate interest;
 - 3.2.5. Market information and our services and products information
In order for us to inform You about the interesting market events and our services and products, for the purpose of providing you with complete information. In that case, the basis for processing of Your personal data is our legitimate interest or Your consent, depending on the particular case.
 - 3.2.6. Other
In order for us to protect our legitimate interest as an investment company (for instance, when that is necessary to conduct judicial proceedings, infringement proceedings and other proceedings or when that is necessary to ensure an adequate level of protection) In that case, the basis for processing of Your personal data is our legitimate interest.

- 3.3. In case you gave us your consent to contact You, your personal data is being processed for the following purposes:
- 3.3.1 To deliver to You our research material and to inform you about the capital market news. In that case, the basis for processing of Your personal data is Your consent.
 - 3.3.2. To contact you for the purpose of presentation of our products and services. In that case, the basis for processing of Your personal data is Your consent.
 - 3.3.3. To protect our legitimate interest (for instance, when that is necessary to conduct safety measures). In that case, the basis for processing of Your personal data is our legitimate interest.

4. Who has access to Your Personal data?

- 4.1. Your personal data is considered to be a trade secret and is being protected according to the valid statutory provisions and best practices.
- 4.2. Third persons have the right to access and to process Your personal data only in the cases below:
- 4.2.1. Legal persons with whom we cooperate with the purpose of fulfilment of our obligations. For instance, institutions in which we deposit Your assets, other brokers with whom we cooperate, the stock exchange and the central depository. In that case, the basis for processing of Your personal data is provided for by law;
 - 4.2.2. Persons with which we have a business relationship, cooperate, or by whom we entered a business relationship. In that case, those legal persons process Your personal data with the purposes provided for by the law;
 - 4.2.3. Other persons with whom we cooperate, like tax, legal and financial advisers or other similar persons. In that case, those persons process solely Your personal data for which we authorised them to and exclusively for our needs;
 - 4.2.4. Legal persons that develop and maintain IT solutions we use. In that case, those persons process Your personal data with the purpose of developing and maintaining IT solutions;
 - 4.2.5. Competent authorities when supervising the lawfulness of operations and procedures – for instance Croatian Financial Services Supervisory Agency, Tax administration and the Money Laundering Prevention Office of the Ministry of Finance – and other legal entities when that is necessary to execute legal duties, such as the auditor. In that case, those persons process Your personal data with the purpose provided for by law;
- 4.3. In case of your consent to contact You, only the persons mentioned in point 4.2.4. and point 4.2.5. have the right to access and processing of your personal data.
- 4.3. The abovementioned persons, that process Your personal data for our needs, have committed to handle Your personal data in an appropriate way and to treat them as confidential.

5. Are Your personal data transferred to third countries?

- 5.1. No, Your personal data will not be transferred outside the territory of the EU;

6. How do We protect your personal data?

- 6.1. The protection of Your personal data is extremely important to us. Some of the measures we conduct are as follows:
- 6.1.1. Implementation of pseudonymisation of databases whenever that is possible;
 - 6.1.2. Application of advanced methods of protection and access control of the data resources that contain personal data;
 - 6.1.3. Continuous surveillance of all resources (physical areas where we store Your data) that are being used for processing of your personal data.

7. How long do we keep your personal data?

- 7.1. For data for which a retention period is prescribed by law, Your data is kept throughout that period and erased after the additional period of one year.
- 7.2. Your personal data as our Clients, for which there is no retention period prescribed by law, we keep during the period of the agreement concluded with You. After the termination of such agreement, Your data will be erased within the additional period of 6 (six) years after the termination of the contract (limitation period of 5 (five) years, increased by the 1 (one) year deletion period).
- 7.3. Personal data that is being processed on the basis of our legitimate interest, we will keep as long as our legitimate interest exists, and they are being erased within 1 (one) year after the termination of our legitimate interest.
- 7.4. Personal data that are processed on the basis of Your consent, we keep as long as we have your consent. In case of withdrawal of consent, we will delete them, in the shortest possible time, as soon as possible to us.

8. Your rights

- 8.1. If You decide to exercise one or more below mentioned rights, the Company has the right to check your identity, with the purpose of protection of your personal data.
- 8.2. You are free to exercise your rights free of charge. However, if You choose to exercise it frequently (for instance, where 6 (six) months or less has elapsed since your last request) or excessively (for instance, You require Your personal data in a written form) You require access or transfer of Your personal data, We may hold you liable for the costs incurred in respect of such proceedings, before performing such actions.
- 8.3. The right of access:
You have to right to request a confirmation on whether we process Your personal data, as well as to access to Your Personal data that we process.
- 8.4. The right to rectification:
You have the right to ask for rectification of Your inaccurate personal data, as well as the right to supplement Your personal data.
- 8.5. The right to withdraw consent and the right to erasure („right to be forgotten“):
You have the right to withdraw Your consent for processing of personal data as well as to obtain permanent erasure of Your personal data that We have processed with Your consent.

- 8.6. Right for data portability
You have the right to ask to receive and transfer Your Personal data.

You may exercise the abovementioned rights by filing the designated form available on your web site at the e-mail address: data.protection@intercapital.hr or in writing to the address of our registered seat.

- 8.7. Right to object to processing and handling of Your personal data
You have the right to object to processing and our handling of Your personal data in general. Please file Your request by e-mail to: data.protection@intercapital.hr, with the subject *Objection to processing* and explain in the text body the reason for Your objection and the nature of Your request.

- 8.8. Right to file a complaint to the Personal Data Protection Agency
As our Client, You have the right to file a complaint at any time to the competent body for the protection of personal data- Croatian Personal Data Protection Agency (www.azop.hr) concerning the processing and protection of Your personal data.