

# PRIVACY POLICY

We, BAO Capital Partners Ltd, are a Cyprus based Alternative Investment Fund Manager, licensed and regulated by the Cyprus Securities and Exchange Commission under Licence Number: AIFM16/56/2013. We are committed to protecting and respecting your privacy regarding any information we might collect while operating our websites.

Our Privacy Policy is designed to ensure compliance with the Processing of Personal Data (Protection of the Individual) Law of 2001. In Cyprus, 'The Processing of Personal Data (Protection of the Individual) Law of 2001' (138 (I) 2001) regulates the collection, the process and the use of personal data. The particular law entered into force in 2001 in order to address privacy issues related to collection, storage, processing, dissemination and use of personal data. Furthermore, the Law was amended in 2003 so that to harmonise the Cyprus legislation with the EU Directive 95/46 on the protection of individuals regarding the processing of personal data.

At BAO Capital Partners Ltd we have two fundamental principles:

1. We don't ask for personal information unless we need it for improving the services offered to our clients.
2. We don't share personal information with anyone except to comply with the law, develop our services and products, or protect our rights.

Below is presented our privacy policy which incorporates these goals:

The present policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding the use of your personal data and how we will treat it. By visiting [www.baocapital.com](http://www.baocapital.com), you accept and consent the practices described in this policy.

## Website Visitors

BAO Capital Partners Ltd may collect non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Our purpose in collecting non-personally identifying information is to better understand how BAO Capital Partners Ltd visitors use our website.

We may also collect potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments. BAO Capital Partners Ltd only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below.

Below is a detailed separation of the kind of information you may collect from our website visitors.

## INFORMATION WE MAY COLLECT FROM YOU

### 1. Information you provide to us

You may provide us with personally-identifying information by filling in forms on our site [www.baocapital.com](http://www.baocapital.com) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, participate in discussion boards or other social media functions on our site, and when you report a problem with our site. The information you give us may include your name, address, e-mail address and phone number, professional experience, personal description, client categorisation, country of residence and etc.

## **2. Information we collect about you**

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time);
- products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

## **3. Information we receive from other sources**

We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and we may receive information about you from them.

## **USE OF PERSONAL INFORMATION**

We, at BAO Capital Partners Ltd may use your personal information to:

- administer this website;
- personalize the website for you;
- enable your access to and use of the website services;
- send to you statements and invoices;
- collect payments from you;
- send you marketing communications; and
- send you the regulatory investor's information updates

## **SECURING YOUR DATA**

We, at BAO Capital Partners Ltd, will take reasonable technical and organisational precautions to prevent any loss, misuse or alteration of your personal information. All the personal information you provide will be stored on our secure servers. BAO Capital Partners Ltd takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

## **DISCLOSURE OF YOUR INFORMATION**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in the Companies Law Cap. 113 (as amended from time to time).

We may share your information with selected third parties including:

- Business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you. Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

## **CROSS-BORDER DATA TRANSFERS**

Information that BAO Capital Partners Ltd collects may be stored and processed and

transferred between any of the countries in which we operate or we cooperate with, to enable the use of the information in accordance with this privacy policy.

## **PROTECTION OF CERTAIN PERSONALLY-IDENTIFYING INFORMATION**

BAO Capital Partners Ltd discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that:

(i) need to know that information in order to process it on BAO Capital Partners Ltd behalf or to provide services available at BAO Capital Partners Ltd websites,

and (ii) that have agreed not to disclose any such information to others by signing our non-disclosure agreements.

Some of those employees, contractors and affiliated organizations may be located outside of your home country. By using BAO Capital Partners Ltd websites, you consent to the transfer of such information to them. BAO Capital Partners Ltd will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, BAO Capital Partners Ltd might disclose potentially personally-identifying and personally-identifying information only in response to a regulatory authority request, court order or other governmental request, or when BAO Capital Partners Ltd believes in good faith that disclosure is reasonably necessary to protect the property or rights of BAO Capital Partners Ltd, third parties or the public at large.

## **COOKIES**

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. BAO Capital Partners Ltd uses cookies to help us identify and track visitors, their usage of our website, and their website access preferences. BAO Capital Partners Ltd visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using our website, with the drawback that certain features of BAO Capital Partners Ltd website may not function properly without the aid of cookies.

## **YOUR RIGHTS**

Under the provisions of the Personal Data (Protection of the Individual) Law of 2001, and in line with our privacy policy, you have the following right in regards to the personal data collected from you and kept by us:

1. The right to information;
2. The right to access;
3. The right to rectification;
4. The right to object;
5. The right to compensation;

More specifically, you also have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by sending us a written request by email.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **PRIVACY POLICY CHANGES**

Although most changes are likely to be minor, BAO Capital Partners Ltd may change its Privacy Policy from time to time in our sole discretion and in line with the regulatory requirements. We encourage our visitors to frequently check this page for any changes to our Privacy Policy.

If you have any questions about this privacy policy or treatment of your personal information, please write to us:

- by email to: [compliance@baocapital.com](mailto:compliance@baocapital.com) or
- by post to: BAO Capital Partners Ltd  
Compliance Officer  
12-14 Kennedy Avenue, Office 501,  
1087 Nicosia, Cyprus