

# PRIVACY POLICY

J&T PRIVATE EQUITY GROUP LIMITED, registration number: HE 327810, with its registered office at Klimentos, 41-43 Klimentos Tower, 1st floor, Flat/Office 18, 1061 Nicosia, Republic of Cyprus (hereinafter referred to as "**JTPEG**"), is committed to protecting the privacy of visitors to its website [www.jtpeg.com](http://www.jtpeg.com) (hereinafter referred to as the "**Website**"). This Privacy Policy (hereinafter referred to as the "Privacy Policy") sets out the terms and conditions under which JTPEG processes personal data (i.e., data relating to an identified or identifiable person) relating to you as a visitor to the Website, either because JTPEG collects that data from you or because you provide it directly to JTPEG. JTPEG acts as a data controller within the meaning of Act No. 110/2019 Coll., on the processing of personal data, as amended, and Regulation (EU) 2016/679 of the European Parliament and of 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 (hereinafter referred to as "GDPR"), which apply to the processing of personal data.

By using the Website or creating an account on the Website, you acknowledge that you are aware of such processing and warrant that all information you provide is accurate. This Privacy Policy may be amended from time to time. Any significant changes to this Privacy Policy will be clearly stated on the Website.

If you provide JTPEG with another person's personal data, you acknowledge that you have informed that person in advance of this Privacy Policy and, where applicable, obtained that person's consent for such provision and related communications.

## 1 What information does JTPEG collect?

### 1.1 IP addresses and basic identification data

When you visit the Website, the JTPEG server logs your IP address along with the date, time and length of your visit. An IP address is an assigned number that allows your computer to communicate over the Internet. It also allows JTPEG to identify which organisations have visited the Website.

JTPEG records other electronic identification data, hardware and software localisation information (if available), and information regarding your browser, device, operating system and platform.

### 1.2 Logs and cookies

JTPEG uses cookies on the Website to collect and process information about your browsing experience. Cookies are text files that can be placed on the user's computer when visiting the website in question. They contain information that is collected from such computer and sent back to the Website on each subsequent visit to remember the user's actions and preferences over time.

JTPEG uses the following types of cookies:

**Functional** – strictly necessary cookies. Functional cookies on the Website are necessary to enable you to navigate the Website and use its features. This includes accessing secure areas of the Website (including relying on your user ID and password to log in to our Website) and identifying and remembering your country and language preferences when you first access the Website.

**Analytics** – performance cookies. Analytics cookies on the Website collect information about how visitors use the Website, such as which pages visitors visit most often and whether they receive error messages from the Website. This is the case with third-party analytics cookies (provided by Google), including the User-ID feature that allows JTPEG to generate a unique ID assigned to a Website visitor. You can block, delete or disable cookies by (de)activating the relevant settings in your browser. In that case, you may not be able to access the entire contents of the Website. If you use multiple devices or browsers, you will need to perform the above process on each of them.

**Marketing.** Marketing cookies may be set by advertising partners on the JTPEG Website to create profiles about your interests and serve ads on other websites based on those profiles. This personal information is not stored directly, but through unique identifiers of the browser and Internet device. If you do not select these cookies, you will get a less targeted form of communication on the Website.

### **1.3 Data you provide about yourself**

You are under no obligation to provide any personal data in the public areas of the Website. You may, however, choose to do so by completing registration forms in various sections of the Website or, if possible, by creating an account on the Website.

## **2 How JTPEG uses the information**

### **2.1 IP addresses, basic identification data, logs and cookies**

JTPEG uses the information in question only for specific purposes based on its legitimate interest in administering its Website and preventing fraud and abuse, in particular:

- a) to collect statistical data on the use of the Website;
- b) to track how users navigate the Website;
- c) to enable JTPEG to evaluate and improve the Website and adapt it to the needs of visitors; and
- d) to monitor and prevent fraud, infringement and other potential misuse of the Website.

### **2.2 Information you provide about yourself**

If you complete one of the forms available on the Website, JTPEG will only use the information you provide in the relevant parts of the Website or in the request form for specific purposes, in particular to (i) process the relevant form, (ii) provide you with access to content (either by downloading materials or by allowing you access to the registered user section of the Website), and (iii) provide relevant research,

information and commercial materials selected by JTPEG. Please note that you have the option to opt out of receiving any further research, information and commercial materials by contacting JTPEG by email at [info@jtpeg.com](mailto:info@jtpeg.com) or by unsubscribing electronically via the link provided at the footer of that communication.

### **3 Security and obligations of JTPEG when processing your data**

In view of modern technology, the cost of its implementation and the nature of the personal data processed, JTPEG has put in place appropriate technical and organisational measures to ensure an adequate level of security and confidentiality of your personal data so that it is protected against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and other unlawful forms of processing.

In addition, when handling your personal data, JTPEG:

- a) only collects and processes personal data that is adequate, relevant and not excessive for fulfilling the purposes set out above;
- b) ensures that your personal data is not retained for longer than necessary unless otherwise required by law; and
- c) ensures that your personal data remains up-to-date and accurate. For this purpose, JTPEG may ask you to review and update the personal data it holds about you. We also encourage you to inform JTPEG without being prompted to do so whenever there is a change in your personal circumstances, in order to ensure that your personal data is kept up to date.

### **4 Access to and transfer of personal data, data controller and data processors**

Data protection legislation allows JTPEG, as the controller, to entrust the processing of personal data to processors. A personal data processor is any entity that processes personal data on the basis of a special law or on the basis of a mandate or authorisation by the data controller. In these cases, the same protection of your data is contractually and legally guaranteed as if the data was processed by JTPEG. Such processors or recipients to whom JTPEG may disclose your personal data include providers of IT services to JTPEG.

JTPEG may also disclose your personal data to public authorities if JTPEG is required to do so by applicable law or if it is necessary for the purposes of or in connection with legal proceedings or for the exercise or protection of the statutory rights of JTPEG and, where applicable, the rights of its partners and members.

## **5 Your rights regarding your personal data**

You may exercise the following rights in relation to your personal data, subject to the conditions and limitations set out in applicable law:

- a) access (and obtain a copy of) that data and, if you believe that any information relating to you is incorrect, incomplete or out of date, request that it be rectified;
- b) request its erasure or restriction of processing, or object to such processing;
- c) request data portability, i.e., to have the personal data you have provided to JTPEG returned to you or transferred to someone else of your choice, in a structured, commonly used and machine-readable format; and
- d) withdraw consent to the processing of personal data at any time, in cases where the legal basis for the processing is the consent of the data subject; however, the withdrawal shall not affect the lawfulness of the processing of personal data based on consent before its withdrawal.

The legitimate interest of JTPEG in the case of processing based on Article 6(1)(f) of the GDPR is the interest in the correct and smooth functioning of the Website.

You may exercise the above rights by sending an email to JTPEG at [info@jtpeg.com](mailto:info@jtpeg.com), or by sending a dated and signed letter addressed to JTPEG at the above address with a scan of the front or first page of your ID card or passport for identification purposes.

All email messages sent to and received from JTPEG may be monitored to ensure compliance with internal policies and to protect the interests of JTPEG.

In connection with the processing carried out, personal data may be sent to the following third countries, i.e., countries outside the European Economic Area, if you give us your explicit consent or if we provide sufficient safeguards to protect the personal data so transferred. If you give us your consent, in connection with Google Analytics and/or the analytics or marketing cookies or cookies linked to social networks and other web technologies described above, such as those used by Meta Platforms, Inc. (formerly Facebook, Inc.), your personal data may be sent to companies established in the United States of America (the "U.S.") on servers located there. Please note that such a transfer may entail risks to the processing of your personal data due to the lack of an adequate data protection decision and appropriate safeguards. Specifically, the transfer and processing of personal data in the U.S. may be subject to surveillance programmes by U.S. government authorities and your personal data may then be disclosed to security services. In the U.S., there is no one specific authority responsible for overseeing personal data protection. Each U.S. federal state has different points of contact with respect to personal data protection powers, including a special court that rules on foreign security oversight matters.

If you are unhappy with the way we process your personal data, please let us know using the aforesaid means of communication and we will investigate your concern. You also have the right to lodge a complaint with the competent data protection authority.