

## **PRIVACY POLICY**

Before using our company's services, please read the following provisions on the protection of personal data that regulate the relationship between you (hereinafter referred to as "the Client") and West Hill Capital (hereinafter referred to as "the Organization").

These provisions outline the principles of collecting, processing, and storing the Client's personal data by the Organization. Personal data refers to any information that identifies you as an individual. The provisions also detail the methods of using your personal information collected during the provision of services, communication via telephone, email, or other available methods. The provisions cover aspects of data collection, third-party disclosure, purposes of use, security measures, and the rights provided for the protection of the confidentiality of your data.

### *Collection and use of personal data*

1. This document describes the principles of collecting and using personal data by clients of the company. During your interaction with our company, you may be required to provide various types of information about yourself, including but not limited to:
2. Unique identification data, contact information, financial data, and other details that may be necessary when filling out online forms, submitting postal applications, communicating via telephone, email, through a personal account, or other available means.
3. Personal data that you provide when using our products and services, registering an account on our website, subscribing to informational newsletters, consenting to receive promotional materials and bulletins, participating in surveys, loyalty programs, special promotions, training, and filling out questionnaires.

The company undertakes to comply with the principles of confidentiality and legislation on the protection of personal data during the collection, processing, and use of the provided information. We also implement all necessary technical and organizational measures to ensure the security and protection of your personal data against loss, unauthorized use, alteration, or unauthorized access by third parties.

By accepting the terms of this document, you agree to the collection, processing, and use of your personal data by the company in accordance with the principles described above and applicable laws. If you need to withdraw your consent or request the deletion of your personal data, you may contact us.

When visiting our website from your device, certain data is automatically transmitted to us. In certain jurisdictions, such as the European Union, this information may be considered personal data according to laws governing their protection. We collect some of this information through cookies. For more information about the cookies we use and the purposes of their use, please refer to our Cookie Policy.

### *The organization may use your personal information for the following purposes:*

1. Sending informational materials, such as news or updates, related to the organization's products and services.

2. Ensuring the quality provision of services by tailoring them to the specific needs and preferences of clients.
3. Conducting audience research and analysis to optimize the offered services by identifying users' interests, preferences, and needs.
4. Investigating possible violations of the privacy policy to ensure compliance with legal requirements and protect the rights and interests of the organization and its users.

Thus, the organization strives to ensure the effective and secure use of user data while providing quality services and complying with legal requirements regarding the protection of personal data.

#### *Provision of Customer Information: Legal Basis and Purpose of Use*

We collect information about you to ensure our customer support and utilize various types of information, including your personal data, contact information, identification archives, budgetary data, significant documents, and other data.

Furthermore, we use your information for risk administration, prevention of tax evasion, and compliance with administrative and legal requirements. We process financial and personal information for these purposes.

We also use your contact details, consent, and correspondence for marketing notifications about our services. We rely on legal grounds related to fulfilling contractual obligations to you. We strive to ensure transparency and protection of your rights during the processing and use of your data.

#### *What informational data can be disclosed to third parties?*

1. We strictly do not disclose informational data to organizations, associations, or other individuals unless it is necessary for the following purposes:
2. Compliance with mandatory and significant legislative requirements, principles, and norms, as well as government demands.
3. Application of regulatory acts to identify violations and resolve conflict situations.
4. Ensuring security, fact identification, and taking measures to prevent potential issues. Protection of the rights, interests, and safety of the company, its clients, and other individuals in accordance with the law. We may provide data about aggregated users of our website to third parties for analysis and identification of general usage trends of our platform. If the company engages in consolidation, sale, or transfer of assets, we guarantee the confidentiality of information and data of our users until the moment of transfer or transmission to the new owner. Our company does not disclose the name, email address, or other user data to third parties.

In some cases, we may transfer your personal information to another country for additional processing in accordance with our privacy policy. This may involve exchanging information with countries where data protection laws may differ from those in your country. However, we ensure that your rights are sufficiently protected in accordance with legal requirements and premises. We employ specialized, coordinated, and authoritative legal measures to ensure the security and confidentiality of your data.

### *What rights does the client have?*

1. Right to access personal information: You have the right to request and obtain a copy of your personal information that we process.
2. Right to rectification: If you believe that your personal information processed by us is incorrect or incomplete, you have the right to request us to correct or supplement that information.
3. Right to data portability: You have the right to request that we transfer your personal information to another controller of your choice. You may also request a copy of all your personal information that we process.
4. Right to withdraw consent: You can withdraw your consent for the processing of your personal information at any time by clicking on the "Unsubscribe" or "Withdraw" button in the marketing emails we send.
5. Right to restriction of processing: You have the right to request that we cease processing your personal information if you believe that the processing is unlawful or that your personal information is no longer necessary for our purposes.
6. Right to object: You have the right to object to the processing of your personal information at any time if you believe that such processing infringes upon your rights and freedoms.
7. Right to erasure: You have the right to request that we delete your personal information that we process if there are no legal grounds for further processing.
8. Right to lodge a complaint: If you believe that we have infringed upon your rights regarding the processing of your personal information, you have the right to lodge a complaint with the data protection authority in your country.

### *Confidentiality and Automated Decisions: Your Protection*

When we use your personal information, we sometimes employ automated decision-making processes that may have a legal impact on you or significantly affect you in other ways. An automated decision is a decision made in a natural manner based on computer calculations without human involvement.

For example, if we use an algorithm to show you advertisements based on your internet search history, this can be an example of an automated decision.

If we use an automated decision that concerns you, and you are concerned about its impact, you have the right to contest that decision. You can provide us with your thoughts and request that we reassess our automated decision with the assistance of a human to ensure that it does not contradict your rights and interests.