



JSC Multi Family Office - University of Georgia And Wealthy

Privacy Policy

Tbilisi

09/09/2021

1. General Provisions

1.1. This Privacy Policy (hereinafter – the “Policy”) defines how JSC Multi Family Office – University of Georgia and Wealthy, (hereinafter – the “Company”) uses and protects the information you provide, containing personal data, subject to applicable data privacy laws.

Applicable data privacy laws mean all laws and other regulations issued by the supervisory authorities of the respective jurisdictions, including, but not limited to, data protection laws and regulations implementing 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 (hereinafter referred to as the “General Data Protection Regulation” and/or “GDPR”).

1.2. Relevant national laws take precedence in the event of a conflict between them and this Policy or where these laws impose more stringent requirements. This Policy will also be followed in the absence of relevant national legislation.

1.3. This Policy applies to the entire process of processing personal data relating to an identified or identifiable individual and does not apply to anonymous or encrypted personal data.

1.4. The Company does not knowingly collect personal data from persons under the age of 18.



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2. Information Collected by the Company

2.1. Information you provide to the Company

The Company collects information that you enter when using the official website of the Company: www.ugw.ge including all of its landing pages and subdomains (hereinafter referred to as the “Website”), as well as the information that you provide to the Company by generating a request to open a Client account with the Company. The information you provide to the Company may include your full name and surname, residential address, email address, telephone number, date of birth, taxpayer identification number (TIN) or an equivalent document, bank and/or other accounts, payment card numbers, and other financial data, copies of identity documents (such as your passport or another document with your photo, proving your identity), as well as documents confirming your current residence address and other documents that may be required for verification according to the Company’s procedures in one way or another case. The Company also collects information when you voluntarily fill out customer surveys, leave reviews, apply for special offers from the Company, participation in competitions/promotions, or register for events (for example, seminars/webinars) that the Company and/or its partners.

2.2. Information that the Company receives from other sources

When you visit the Website, the Company may collect information about your IP address, URL, browser, types of plug-ins, operating system, and platform, as well as other data for entering the information and trading system of the Company. The Company works closely with third parties (for example, technical service providers, ad networks, tracking and analytics service providers (including Google), data aggregators, lead generation agencies,



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public sources, third-party social media sites, and search providers) and may receive from them information about you. Such information may include statistics of visits through the Company's Website, the products you viewed and the history of interaction with the page, your personal contact information (for example, if you were directed to the Company by the Company's Web partner), any personal data that is part of your profile on the Website of a third-party social network and/or your data available in the official groups of the Company (for example, on Instagram or Facebook).

2.3. Information that the Company receives when using cookies

The Company or its third-party service providers may use cookies to collect information about you. This helps the Company to make the process of using the Website more convenient for you and to provide better Services.

3. How the Company Uses Personal Data

3.1. Purposes for which the Company processes information about you

The Company processes (uses/stores/transfers/organises, etc.) information about you in order to fulfil obligations arising from the data privacy laws applicable to the Company, the Company's licensing obligations to regulatory bodies, any agreements concluded between you and the Company, as well as with the purpose of:

- providing you with customer service and improving its quality;
- providing you with information, services, products, and services;
- ensuring mutual settlements;
- providing you with technical and other support and communication;



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- conducting monitoring/inspections in order to maintain an adequate level of security and implement measures to combat money laundering and terrorist financing;
- confirmation of your identity;
- monitoring of accounts in order to prevent unfair or illegal actions;
- providing you with marketing information about the goods and services offered by the Company and/or its partners;
- in order to provide information to any of the Parties under the Client Agreement;
- maintaining and storing accounting records, as well as generating statistics for your trading/investment operations;
- compliance with regulatory requirements by the Company;
- internal administration;
- execution of information exchange according to FATCA and CRS standards;
- for the purposes of judicial and other legal protection of the rights and legitimate interests of the Company.

3.2. Transferring information about you to third parties

Within the limits established by the currently applicable law, this Policy and/or the Client Agreement, the Company has the right to transfer information to affiliated persons, including legal entities related to the Company corporately, to third-party contractors (service providers, including liquidity providers, developers of software that uses the Company, sites that carry out AML/CTF and KYC checks, auditors, lawyers, accountants engaged by the Company), banks and other financial institutions involved in mutual settlements between the Company and its clients, judicial and other government agencies. The information that the Company collects, processes, and stores may be transferred,



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controlled, and processed inside or outside the European Economic Area (hereinafter – “EEA”). In particular, the Company’s service providers may be located in Europe, Asia, and/or other regions. Personal data transferred to a recipient outside the EEA is subject to protection equivalent to that provided by the GDPR.

3.3. Information storage period

All information that the Company collects will be stored only for as long as it is necessary to achieve the goals set out in this Policy, that is, for the time (a) while you use the services of the Company or for as long as (b) it is required as part of compliance with the Company’s legal obligations (for example, storing information in order to fulfil the tax/accounting/licensing obligations of the Company).

In determining the appropriate retention periods for your personal information, the Company will consider factors such as:

- contractual obligations and rights in relation to the information involved;
- legal obligations in accordance with applicable law governing the storage period of data for a certain time;
- the limitation period in accordance with the current legislation;
- possible disputes;
- the recommendations of the relevant data protection authorities.

As soon as possible, the Company will securely delete your information when it is no longer needed. If the data is not deleted because it is necessary for other legitimate purposes, their processing will be limited. Namely, the data will be blocked for processing for other purposes. This applies, for example, to data that must be stored in accordance with the requirements for information storage, reporting and tax law.



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4. Your Rights

The Company takes measures to ensure that your personal data is accurate and up-to-date. If you live in the European Economic Area, you have certain rights, including:

- the right of access (Article 15 of the GDPR): you have the right to request from the Company confirmation of whether the Company is processing your personal data, as well as access to personal data and relevant information about this processing (for example, what purposes of processing or categories of personal data involved);
- the right to rectification (Article 16 of the GDPR): you have the right to rectify your personal data in accordance with the currently applicable law;
- the right to erasure (Article 17 of the GDPR): you have the right to send a request to the Company to delete your personal data in accordance with the currently applicable law. This right can be exercised, inter alia: (i) when your personal data is no longer needed for the purposes for which it was collected or otherwise processed; (ii) when you withdraw the consent on which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) of the GDPR and in the absence of another legal basis for the processing; (iii) when you object to the processing pursuant to Article 21(1) of the GDPR and there is no legal basis for the processing, or when you object to the processing pursuant to Article 21(2) of the GDPR; or (iv) when your personal data has been processed unlawfully;
- the right to restriction of processing (Article 18 of the GDPR): you have the right to demand the restriction of the processing of personal data under certain circumstances, including when the accuracy of your personal data is disputed; when the processing is unlawful, and you object to the deletion of your personal data and instead request the restriction of the use of your personal data; or if you object to the processing pursuant to Article 21(1) of the GDPR;



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- the right to data portability (Article 20 of the GDPR): you have the right to receive the personal data that you have provided to the Company in a structured, commonly used, and machine-readable format and you have the right to initiate the transfer of this information to another controller, including direct transfer, if technically possible;
- the right to object (Article 21 of the GDPR): you have the right to object to the processing of your personal data under the currently applicable law. In particular, an objection can be raised against processing for certain purposes, such as direct advertising. After that, the Company will no longer process your Personal Data for the specified purposes.

5. Use of Cookies

5.1. What are cookies?

Cookies are small text files that are placed on your computer, smartphone, or another device when you visit the Website. They allow the Company to distinguish you from other users, which helps the Company to improve the performance of the Website. Cookies also allow you to perform many operations, such as quickly logging into your account, ordering products and services, or using other tools.

5.2. What cookies does the Company use?

The Company's Website uses three types of cookies: first-party cookies, performance cookies, and custom content cookies. (1) First-party cookies enable the Company to operate important functions of the Website and the information and trading platform. If they are disabled, you will not be able to access the trading information platform or other important



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parts of the Website. (2) Performance cookies enable the Company to recognise and count the number of visitors, as well as see how visitors move around the Website as they use it. This helps the Company to improve the performance of the Website, for example, by ensuring that users can easily find what they need. (3) Cookies with customised content allow the Company to adapt the content of the Website according to your preferences and to link to other websites such as social networking sites. For example, instead of showing advertisements about products you already have, they allow the Company to show you other services that may interest you. The Company uses cookies with customised content only subject to your prior consent to this.

5.3. How to disable cookies

When you visit the Website, the Company asks for your permission to use cookies. If you want to disable all cookies, you can do this in your browser settings. However, please be aware that cookies are often used to enable and improve certain features on the Company's Website. If you choose to refuse certain cookies, this may affect the operation of the Website. For more information on how to disable cookies, including instructions on how to change cookie settings for different browsers and how to delete existing cookies from your device, visit allaboutcookies.org.

6. Security Measures

To ensure the security of your personal data, the Company has implemented a number of security measures, including ensuring the security of the operating environment, which is available, if necessary, only to employees, agents, and contractors of the Company; encryption of confidential financial information processed to complete transactions through



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the Website; mandatory client identification to gain access to the account (client's personal account), password protection, and other measures.

With the help of modern technical and organisational measures implemented by the Company, your personal data is protected from unauthorised access and illegal processing or disclosure, as well as from accidental loss, alteration, or destruction. These measures are constantly adjusted and updated in accordance with the technical developments of the Company and organisational changes. Besides, data protection audits and other checks are carried out regularly.

However, no transmission or storage of data can be fully secured, and therefore the Company cannot guarantee security with respect to any information that the Company collects and stores.

7. Data Protection Officer

Data subjects may contact the Company's data protection officer by email legal@ugw.ge if they have any questions about data protection and the exercise of any of their rights set out in section 4 of this Policy.