

Privacy Policy (webpage): (suggested corrections)

Privacy Policy

1. We *recognize* the importance of *ensuring the security* of your Personal Information and therefore collect and handle only the information necessary to carry out our activities. Personal Information is handled *in compliance with applicable laws, in a transparent and responsible manner, for a pre-established purpose*, and only *to the extent necessary* to achieve the intended purpose. While handling your Personal Information, we *strive* to ensure that your Personal Data is accurate, secure, confidential, and properly stored.
2. While handling your Personal Information, we *comply with* European data protection laws as well as applicable legislation governing Personal Information processing.

A. What is this document?

3. This Privacy Policy (*hereinafter referred to as the "Privacy Policy"*) sets forth the privacy terms applicable while you use the website <https://dhf-capital.com> (*hereinafter referred to as the "Website"*).
4. *Please read this Privacy Policy carefully to understand how we handle your Personal Data.* By confirming the Privacy Policy, you expressly agree that we will collect, handle, and process your Personal Data as specified in this document.
5. The term "*Personal Data*" used in this Privacy Policy refers to any information that can help identify you, either directly or indirectly. *Personal Data includes* your name, surname, date of birth, email or postal address, location information, and internet identifiers, as well as *other relevant characteristics*.
6. *Any other terms* written with an initial capital letter *shall have the same meaning as defined in the* Buy-Sell Agreement on the Website (*hereinafter referred to as the "Agreement"*).
7. *This document explains how we handle your Personal Data, how it is collected, and outlines your rights as a data subject.*
8. *This Privacy Policy applies to all visitors of the Website*, as well as to any actions performed on the Website, including registration and subscription for commodities. *By using the Website, you acknowledge that you have read and agree to this Privacy Policy, including the purpose, methods, and procedures for processing your Personal Data.* If you do not agree with this Privacy Policy, you *must refrain from using the Website.*

B. Who are we?

9. *The Website is operated and managed by DHF Capital S.A.*
10. *In compliance with European data protection regulations, we are the data controllers of your Personal Data.*

C. What principles do we use?

- *We adhere to the following principles when managing your Personal Data:*
 - a) *Complying with all applicable laws*
 - b) *Ensuring lawful, fair, and transparent processing*
 - c) *Collecting data only for specified, legitimate purposes*
 - d) *Taking measures to correct inaccurate data*
 - e) *Processing data for no longer than necessary*
 - f) *Ensuring data is not transferred or disclosed to third parties unless specified in the policy or required by law*
 - g) *Implementing security measures to protect Personal Data from unauthorized access or damage.)*

D. Why do we manage your personal data?

12. *Your Personal Data will be used for the following purposes:*
 - a) *To conclude and enforce agreements*
 - b) *To improve and customize our services*
 - c) *With your consent, to offer you promotional content*
 - d) *For other legal or legitimate interests, as required.*

E. How do we collect and process your Personal Data?

13. *We process your Personal Data in the following ways:*
 - a. *When you submit your Personal Data to us (for example, you register on the Website, e- mail or telephone);*
 - b. *When you use the Website (for example, the computer address (IP), type of the web browser used, the number of visits, viewings of the Website, time spent on the Website and etc.)*
 - c. *When we receive your Personal Data from third parties in compliance with applicable laws.*

14. You provide Us with your Personal Data and other information by registering on the Website, by submitting documents, by writing to Us or Our customer service team, when ordering goods, paying for them, filling in the delivery information, by participating in a tender, a campaign or a survey or submitting your complaints regarding the Website or the product. When you contact us in writing or by e-mail, we will save your correspondence.

15. The information you provide may include your full name, address, postal code, e-mail address, your bank account details (including account number, bank code, and IBAN), credit or debit card data (including bank account number, bank code, IBAN), card number, expiration date and CVC security code), the address for the invoice and etc.

16. When you use the Website, certain non-personal information (such as the Computer address (IP), the type of the web browser used, the number of visits, viewings of the Website, time spent on the Website) is automatically collected. This information is used to improve the content, functionality, and attractiveness of the Website.

17. We may combine the Personal Data received from you with the data from our own collection from other public or accessible sources. For example, we may combine your personal data with data obtained through the use of the Website cookies or with data legally obtained from the third parties. By enforcing your rights, you will always be able to request correcting your Personal Data.

18. If you register on the Website, you may at any time remove your personal information from the Website by cancelling your registration (i.e., your account). You can send an application for cancellation to an e-mail address provided on our website. The application must clearly indicate your full name and other registration details (if any). If we have any doubts about your identity, we may ask you to provide proof of identity. You can cancel your registration on the Website in your account. After removing your registration (account), we will immediately, no later than 30 calendar days, terminate your Personal Data processing activities, except for the cases specified in this Privacy Policy and legal acts.

F. Do we use your Personal Data for direct marketing purposes?

19. We may use your Personal Data to inform you about our goods and services that we believe may be of interest to you. *We will only use your Personal Data for direct marketing if you have given explicit consent.*

20. *By opting in to direct marketing, you consent to be contacted via email, phone, SMS, or other agreed communication channels. We may combine*

available information about you with the information available to third parties in order to provide you with proposals

21. If you give your consent to use your Personal Data for direct marketing purposes, we may use your Personal Data to analyze and improve the effectiveness of our Website, advertising and market research, as well as other marketing and sales goals. In this case, we will use your impersonal Personal Data.

22. Even if you have given your consent to the processing of your Personal Data for direct marketing purposes, you may at any time easily cancel this consent for all or part of the processing of Personal Data. To do this, you can:

- a. Modify the setting in your account in the Website stating that you no longer want your Personal Data to be used for direct marketing purposes; or
- b. Notify the refusal in the manner indicated in the notices and/ or offers received (for example, by clicking on the unsubscribe button in the newsletter, etc.); or
- c. Sending us a request by e-mail. The application must clearly indicate your full name and other registration details (if any). If you desire to cancel your consent in this way, we may ask you to provide proof of identity, as well as any additional information related to the request.

23. We will *endeavour* to terminate your Personal Data processing for direct marketing purposes as soon as possible, no later than within 5 (five) business days of your request.

24. The cancellation of the agreement does not automatically oblige us to destroy your Personal Data or provide you with information about your Personal Data. For these actions, we require you to specify such a request separately.

G. How do we use cookies?

25. We collect information about you using cookies and similar technologies. Cookies are small files *that are* temporarily stored on your device's hard drive *and allow us* to recognize you during *future* visits to the Website *by saving your browsing history, preferences, and customization settings. They also help speed up Website searches, enhance user experience, and improve overall performance.* Cookies are a common feature of web browsing, making Website navigation easier and more efficient.

26. *Using cookies, we may collect the following information: IP address, browser type, demographic data, and, if you accessed the Website from a third-party web page, the referring URL.*

27. We use *cookie data* for the following purposes:

- a. *To recognize you when you revisit the Website and direct you to your account;*
- b. *To ensure the functionality of the Website (e.g., enabling personalized settings);*
- c. *To improve and develop the Website, ensuring it better meets your needs;*
- d. *To analyze Website usage and enhance service development;*
- e. *To implement targeted marketing strategies.*

28. *Without violating applicable laws, we may combine information obtained through cookies with data collected by other means, such as information you provide when using the Website.*

29. The Website may use the following types of cookies:

- 1. **Technical cookies** – *Essential for the proper functioning of the Website.*
- 2. **Functional cookies** – *Not necessary for basic Website functionality but significantly enhance performance, quality, and user experience.*
- 3. **Analytical cookies** – *Used for statistical analysis of visitor navigation; data collected by these cookies is anonymized.*
- 4. **Targeting or promotional cookies** – *Used to display services or content relevant to your interests.*
- 5. **Social media cookies** – *Required if you wish to share Website content on your social media profile.*

30. *A detailed table outlining the cookies used on the Website, their purpose, validity, and the data they process is provided below.*

TABLE (please also include table borders to make it look nicer)

31. You can give your consent to the use of cookies in the following ways:

- a) *By not deleting cookies and/or not changing your internet browser settings to block them;*
- b) *By clicking the “Accept” button on the cookie notification bar on the Website;*
- c) *By providing consent during registration on the Website.*

32. *Your consent for the use of cookies is valid for one (1) year from the date it is given.*

33. *You may revoke your consent to the use of cookies at any time. You can do this by changing your Internet browser settings so that it does not accept cookies. The method for doing this depends on your operating system and browser. For detailed information on cookies, their use, and how to opt out, visit: <http://AllAboutCookies.org> or http://google.com/privacy_ads.html.*

34. *In some cases, particularly if technical or functional cookies are disabled or deleted, browsing speed may decrease, certain Website functions may be restricted, and access to the Website may be blocked.*

H. Whom do we provide your Personal Data to?

35. We guarantee that your personal data will not be sold, *shared*, or otherwise *transferred to third parties for purposes other than those for which they were collected*. We will not transfer your personal data *in any manner* except in accordance with this Privacy Policy and *applicable* legal acts. However, we reserve the right to provide information about you if *required by law* or *requested by law enforcement agencies* or prosecution authorities.

36. We may transfer your personal data to companies that help us *conduct* our business (for example, *issuing* financial documents, *processing* or *administering* your payments, *delivering* goods to you, etc.), as well as *for* direct marketing purposes (such as *sending* newsletters, *organizing* games, etc.). *We require our partners to process your data only in accordance with our instructions and applicable data protection laws.*

37. We may disclose the following data about you to the following third parties:

a. *Third-party providers, such as couriers, banking partners, technical service providers, payment card issuers, and payment service providers, to ensure the fulfillment of our agreements with you and our service providers;*

b. *Third-party service providers typically used for payment processing, data storage, telecommunications, and website hosting;*

c. *Financial institutions processing your credit or debit card details. For example, if you authorize a payment on your behalf, we will transfer your personal information to third parties to process the payment. If you request a payment to an institution outside the European Union (EU), your data may be transferred to a country that does not provide*

the same level of security. By making such a request, you confirm your agreement to this data transfer.

I. How long do we keep your Personal Data?

38. We protect your Personal Data *only for as long as necessary to fulfill the purposes for which it was collected or as required by law if a longer retention period is mandated.*

39. *Unless otherwise stated, we will keep your Personal Data (including data collected for direct marketing purposes and records of in-person correspondence) for no longer than two years from your last login or after you have signed out from the Website.*

40. Your Personal Data, *collected or processed for the purpose of concluding and enforcing the Agreement with you, will be kept for the duration of the contract and for an additional 10 years after its expiration.*

41. We strive to avoid retaining outdated or irrelevant Personal Data. Therefore, *we regularly update the information (e.g., when you edit your account details or modify your information) to ensure that only the most current data is maintained. Historical information is retained only if necessary, in accordance with legal requirements or for operational purposes.*

J. How do we protect your Personal Data?

42. The data we collect from you will be stored in the EU but may also be transferred to or stored outside the EU. *It may also be processed by our personnel or that of our suppliers operating outside the EU.* When transferring your data outside the EU, we will take all necessary steps to ensure that your data is processed securely and in compliance with this Privacy Policy.

43. Unfortunately, the transmission of information over the Internet is not completely secure. Although we *make every effort* to protect your personal data, *we cannot guarantee its security during transmission to the Website—you assume the risks associated with data transfer.* Once we receive your data, we will apply strict procedures and security measures to protect it against unauthorized access. **[OR While we implement robust security measures, no method of data transmission over the Internet is 100% secure. You acknowledge and accept the risks associated with online data transmission.]**

44. *In the unlikely event of a breach of your Personal Data that may pose a serious threat to your rights or freedoms, we will immediately notify you as soon as we become aware of it and determine which information has been accessed.*

K. Third-party Websites:

45. Occasionally, the Website may contain links to external sites—our business partner websites or websites promoting our products. By following such links, please note that these websites and the services available through them have their own separate privacy policies. *We do not assume any liability or responsibility for these policies or for the collection of Personal Data on these websites, including contact or location data.* Please review these policies before submitting your personal information to these websites or using any services.

L. What *rights* do you have?

- a. **46.** In processing your Personal Data, we guarantee your rights under the applicable European data protection law. As a personal data subject, you have the following rights:
 - a. *To be informed* about the processing of your Personal Data;
 - b. *To access* your Personal Data that we handle;
 - c. *To request correction or completion of incorrect, inaccurate, or incomplete* Personal Data;
 - d. *To request the deletion of Personal Data when it is no longer necessary for the purposes for which it was collected;*
 - e. *To request the deletion of Personal Data if it has been processed unlawfully, if you withdraw your consent to its processing, or if you did not provide such consent where required;*
 - f. *To object to the processing of Personal Data or withdraw previously given consent;*
 - g. *To request the restriction of the processing of your Personal Data in cases of disputes, verification of processing legality, or data accuracy, as well as in cases where we no longer need your Personal Data but you wish for it to be retained;*
 - h. *To request, if technically feasible, the provision of your Personal Data in an easily readable format for your own use or for transfer to another data controller, provided it is processed based on your consent or for contract performance.*
- a. **47.** We will endeavor to guarantee the exercise of your rights as a data subject and create all necessary conditions for their effective enforcement. However, we reserve the right to decline your request if necessary to ensure:
 - a. *Compliance with legal obligations imposed on us;*
 - b. *State security or defense;*
 - c. *Public order, prevention, investigation, detection, or prosecution of criminal offenses;*
 - d. *Important economic or financial interests of the State;*
 - e. *Prevention, investigation, and detection of breaches of official or professional*

ethics;

f. The protection of your rights or freedoms.

48. You can submit requests related to the exercise of your rights *in person, by post, or via electronic communication*. Upon receipt of your request, we may ask you to provide proof of identity, as well as any additional information necessary to process your request.

49. Upon receiving your request, we will respond within *30 calendar days from the date of submission of all necessary documents*.

50. If necessary, we will suspend the processing of your data, except for storage, until your request is resolved. If you *legally withdraw your consent*, we will immediately cease processing your Personal Data, but no later than within *30 calendar days*, except in cases specified in this Privacy Policy (see Section 7) and legal acts.

51. If we deny your request, *we will clearly state the reasons for our refusal*.

52. If you disagree with our actions or response to your request, *you have the right to submit a complaint to the relevant state authority*.

M. Where can you submit a complaint?

53. If you wish to file a complaint regarding the processing of *your data, please submit it in writing, providing as much detail as possible*, using the contact details provided at the end of this policy. *We will work closely with you to resolve any issues as quickly as possible*.

54. If you believe that your rights have been violated under data protection law, *you have the right to file a complaint with the relevant Supervisory Authority*.

N. How can this privacy policy change?

55. All changes to our Privacy Policy will be posted on the Website. *If necessary, we will notify you accordingly*. The new Privacy Policy terms *may also require your review and acceptance* in order to continue using the Website or placing orders.