

Approved by the Shareholders' meeting of
"Invia Investments" CJSC

Dated on 26/04/2024

Executive Director of "Invia Investments" CJSC
Anahit Shakaryan



"Invia Investments"

Closed joint stock company

PRIVACY POLICY

Privacy Policy (hereinafter referred to as the Policy) of " Invia Investments" closed joint stock company (hereinafter referred to as the Company) is developed in accordance with the legislation of the Republic of Armenia, including the RA Law "On the Securities Market", the RA Law "On Combating Money Laundering and Terrorism", "Personal on data protection" in accordance with RA law and represent the general provisions for the processing, use and protection of Personal data of visitors to the Company's official website <https://inviabroker.com> (hereinafter referred to as the Website) and the Company's clients (hereinafter also referred to as User, Client).

In case of using the Company's services and/or from the moment of signing a contract/ agreement with the Company, the Client unconditionally agrees to transfer his Personal data to the Company in the manner defined by this policy and allows the Company to process Personal data in the manner defined by these Policy.

The Company reserves the right to change any provision presented in the Policy without prior notice to the User.

1. CONCEPTS

The following concepts are used in these policy with the following meanings:

"Law". Law of the Republic of Armenia "On Protection of Personal data".

"Personal data". any information relating to a natural person that permits or may permit the direct or indirect identification of the person.

"Data subject" means a customer of the Company and/or a person using the Company's Website

"Database" a set of Personal data organized by certain characteristics

"Personal data processor". "Invia Investments" CJSC

"Personal data processing". regardless of the form and method of implementation (including with or without the use of any automated, technical means) any action or group of actions related to the collection or recording or input or coordination or organization or storage or use or transformation or recovery or transfer or correcting or blocking or destroying or performing other actions;

"Transfer of Personal data to Third parties" an action aimed at transferring Personal data or introducing them to other persons of a certain or indefinite scope, including publishing Personal data through mass media, placing it in information communication networks or making Personal data available to another person in another way.

"Third party" any person, body, institution or organization that is not a Data subject, Personal data processor or authorized person and whose rights or legal interests are affected or may be affected as a result of the processing of Personal data.

"Contract" a document signed between the client and the Company as part of the services provided by the Company, which includes the rights and obligations of the parties related to the processing of the client's Personal data.

"Website" Company Website: <https://inviabroker.com>

2. GENERAL PROVISIONS

These Policy define the procedure for the processing, use, storage and transfer of the Personal data of the Data subject to Third parties, in particular

- the legal basis and purpose of Personal data processing,
- the list of Personal data to be processed,

- the list of actions to be performed with Personal data, for which the consent of the Data subject is requested,
- the range of persons to whom Personal data may be transferred,
- information on requesting correction, destruction of Personal data, termination of data processing or performing other processing-related actions by the Data subject,
- the validity period of the requested consent, as well as the procedure for withdrawing the consent and its consequences,

(a) **Information Provided by Customer.** Company: may collect Personal data provided voluntarily by the Client, such as name, surname, e-mail address, phone number and other contact information.

(b) **Automatically Collected Information .** The Company may automatically collect certain information such as the User's IP address, browser type, device type, etc. This information is used to analyze, administer the site, track user movements and collect other information.

3. LEGAL BASIS AND PURPOSE OF PERSONAL DATA PROCESSING

The Company collects, stores and uses Personal data to provide customer services and to identify the needs and interests of its customers and partners.

The purposes of collecting Personal data are:

- Provision of services
- Ensuring the authenticity of the customer's Personal data (checking, correcting or updating)
- Confirmation of the client's identity (identification)
- Identifying potential problems and abuses and providing possible solutions accordingly,
- Fulfillment of the requirements of the RA legislative acts and other normative legal acts, in particular, for the purpose of the requirements of Article 16 of the RA Law "On Combating Money Laundering and Terrorism".

3.1 The received data are not subject to transfer to Third parties without the Client's consent, but it can be used by any department within the Company and provided to the Company's partners for the purpose of providing services.

3.2 In order to protect the client's Personal data, contracts signed with all partners of the Company receiving information containing Personal data necessarily contain clauses prohibiting the disclosure of confidential information (including Personal data).

4. USE OF COOKIES

4.1 Through its Website, the Company tries to provide as much information as possible about the services provided by the Company. For this purpose, the Company uses cookies, which are files that are stored on the User's computer or mobile device when visiting certain websites. The company uses cookies in order to improve the Website, improve the quality of the services provided, and ensure communication with the client.

4.2 If the Data subject continues to use the Website, he/she automatically agrees to the collection of Personal data through the Website's cookie files for the above purposes. If desired, the User can disable cookies from the browser settings, but refusing to use cookies may lead to technical difficulties and partial use of the Website.

4.2 The Website may contain links to the websites of other organizations, in case the User leaves the Company Website through the links, the Company is not responsible for the privacy policy of other websites. For this purpose, the Company recommends that you familiarize yourself with the privacy policies of the aforementioned organizations before providing personal information.

5. PRINCIPLES OF PERSONAL DATA PROCESSING

5.1 The processing of Personal data in the company is carried out guided by the following requirements:

- (a) legality of Personal data processing, which implies the implementation of data processing with the consent of the subject;
- (b) the lawfulness of the purposes, the means of processing and the reliability of the data
- (c) informing the subject about the processing of Personal data and the legally significant consequences of such processing
- (d) appropriateness of the volume and nature of Personal data, processing means and purposes
- (e) compliance of actual and stated processing purposes;
- (f) retention of Personal data for the period intended to achieve the objectives determined in advance.

6. RIGHTS OF THE PERSONAL DATA SUBJECT

6.1 The subject of Personal data decides on the provision of his Personal data and agrees to their processing freely, of his own free will and in his own interests. Consent to the processing of Personal data may be given by the subject of Personal data or his representative in any form that allows confirming the fact of their receipt, unless otherwise provided by law.

6.2 The subject of Personal data has the right to request the company (by sending a written request) to clarify his Personal data, block or destroy in cases where Personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take legal action. Means for the protection of their rights.

6.3 The subject of Personal data has the right, upon written request, to receive information about the processing of his Personal data (if this right is not limited by law), including:

- 1) regarding the confirmation of the fact of processing Personal data and the purpose of processing;
- 2) on ways of processing Personal data;
- 3) regarding the subjects to whom the Personal data is provided or may be provided;
- 4) regarding the list of processed Personal data and the source of obtaining them;
- 5) regarding the terms of processing Personal data;
- 6) regarding possible legal consequences for the Data subject as a result of processing Personal data.

6.4 Information is provided to the Data subject free of charge, unless otherwise provided by law.

6.5 If the Data subject believes that the Personal data held about him/her is incorrect or incomplete, you have the right to request that it be corrected or updated. The Company may investigate a request for incorrect and/or incomplete Personal data and will make the necessary corrections.

6.6 If the Data subject considers that the processing of his Personal data is carried out in violation of the requirements of this law or otherwise violates his rights and freedoms, he has the right to appeal the processor's actions or inaction or decisions to an authorized body for Personal data protection or to a court.

6.7 The Data subject has the right to submit a complaint to the Company if he believes that his Personal data has been processed in violation or if he does not agree with the procedure for processing his Personal data.

7. TERM OF STORAGE OF PERSONAL DATA

7.1 Data processed on the basis of consent are stored for the period that is objectively necessary to fulfill the purposes of data processing, or for the period defined by the consent.

7.2 The Company periodically reviews the terms of Personal data storage in accordance with the requirements of the current legislation of the Republic of Armenia. The Data subject's Personal data will be preserved for the duration defined by the Company's procedures and RA legislation, avoiding their repeated processing.

8. OBLIGATIONS OF THE COMPANY

8.1 In accordance with the requirements of the RA Law «On Personal data Protection», the Company is obliged to:

- to provide the Personal Data subject with information on the processing of his Personal data or legally justify the refusal based on his written request,
- at the request of the subject of Personal data to clarify, block or delete the Personal data being processed, If the Personal data is incomplete, outdated, inaccurate, obtained illegally or is not necessary for the stated purpose of processing,
- to inform the subject of Personal data about the processing of Personal data, if the Personal data was not obtained with the consent of the subject of Personal data (unless the subject of Personal data has already been informed about the processing of his Personal data),
- The company does not sell or otherwise transfer the Personal data of the subject of Personal data to Third parties without prior notification and obtaining the consent of the subject of Personal data.
- Save the received information in the Personal database, which is updated every time new information is received.

9. SECURITY MEASURES IN PLACE

9.1 When processing Personal data, the Company takes all necessary legal, organizational and technical measures to avoid unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of Personal data, as well as to protect Personal data from other illegal actions.

9.2 The requirements and rules for the processing and protection of Personal data are provided during the preparation of corporate documents related to all areas of the Company's activities.

9.3 The Personal data storage system constantly monitored by the Company's employees, consisting of regularly updated elements, is located on computer equipment within the Company and is protected by network and protective network routers that ensure modern security rules.

9.4 The employees of the company and other persons who have access to the processed Personal data have signed an obligation not to publish confidential information, and have also been warned about the possible responsibility in case of violation of the norms and requirements of the current RA legislation in the field of Personal data processing.

9.5 In order to protect the data of the subject of Personal data, the contracts concluded with all partners of the Company receiving information containing Personal data necessarily contain provisions prohibiting the disclosure of confidential information (including Personal data).

10. FINAL PROVISIONS

10.1 Other rights and responsibilities of the Company as a processor of Personal data are defined by the legislation of the Republic of Armenia in the field of Personal data.

10.2. Personal of the company guilty of violating the norms regulating the processing and protection of Personal data bear material, disciplinary, administrative, civil liability in accordance with the law.

CONTACT US

If you have any questions or concerns about this privacy policy, please contact us at:

E-mail: address: info@inviabroker.com