

# Privacy Policy

This Privacy Policy describes how AS Avaron Asset Management (hereinafter **Avaron**) processes the personal data of our customers, their representatives, and users of Avaron's services and of our website.

## 1. Definitions

**Personal data** means any information relating to a natural person identified or identifiable directly or indirectly (including name, identification number, location data, online identifier).

**Processing** shall mean any operation conducted with customer data (including collection, recording, reorganisation, modification, publication, use, deletion).

**The controller of the personal data** is AS Avaron Asset Management, registration code 11341336, address Narva Road 7D, 10117 Tallinn, Estonia.

## 2. Purposes of and legal basis for data processing

When collecting personal data, we limit ourselves to the minimum necessary to fulfil the purposes described in this section.

Avaron obtains personal data directly from you, including by collecting data about your activities when using our services, and, where applicable, from publicly available sources or third parties as permitted by law. Providing certain personal data may be required by law or necessary for entering into a contract. Failure to provide such data may result in our inability to provide services.

The legal basis for the processing of personal data is, depending on the situation, (i) the conclusion or performance of a contract, (ii) Avaron's legitimate interest, (iii) legal requirements under applicable legislation, or (iv) the data subject's consent. The categories of personal data processed varies depending on the specific purpose of the processing.

<i>PURPOSE OF PROCESSING</i>	<i>LEGAL BASIS</i>	<i>CATEGORIES OF PERSONAL DATA</i>
Provision of services	Contract	Identification data, contact details, transaction data
Compliance with AML/KYC obligations	Legal obligation	Identification data, due diligence data
Marketing communication	Consent or legitimate interest	Contact details
Website analytics	Consent	Online identifiers, IP address, usage data

Where processing is based on legitimate interest, such interest may include ensuring service security, improving our services, preventing fraud, and managing customer relationships. We assess and balance our interests against the rights and freedoms of data subjects.

The processing of personal data is in more detail regulated in Avaron's Data Processing Principles available on Avaron's website <https://avaron.com/documents/>.

### 3. Data sharing and disclosure

Personal data processed by Avaron may be disclosed without the consent of the data subject only to an authority or person who has a legitimate need for it or a direct legal right to it. We may transfer your personal data for processing to third parties who help us provide and manage our services. In any case, we will transfer data to a processor only to the extent necessary for the performance of a specific task or service.

### 4. Data retention & personal data security

Avaron retains personal data for as long as necessary to achieve the purposes for which the data were collected. Retention periods include:

Customer relationship data	during the contractual relationship and up to 5 years thereafter
AML-related data	in accordance with statutory retention obligations
Marketing data	until consent is withdrawn
Website analytics data	as specified in clause 5 below

The retention period will also depend on the legal requirements for storage of documents and personal data.

Avaron maintains appropriate technical and organisational security measures to protect your personal data against loss, destruction, misuse and unauthorised access or disclosure. Please however bear in mind that although we strive to protect the security of personal data with reasonable measures, no system can eliminate all possible risks.

### 5. Collecting data on website visitors

Avaron's website [avaron.com](http://avaron.com) and [avaron.ee](http://avaron.ee) uses cookies to personalise content and ads, to provide social media features and to analyse the traffic of our website. Cookies are small text files that can be used by websites to make a user's experience more efficient.

Non-essential cookies (such as analytics or marketing cookies) are used only on the basis of your prior consent. Necessary cookies are used to ensure the proper functioning of the website. You can make choices and find additional information about cookies by navigating the cookies consent form on our website. You may at any time change or withdraw your consent on our website. If you do not agree to the use of cookies, you may also block cookies. To do this, you must change the relevant settings in your browser.

Avaron's website uses different types of cookies. Detailed information about cookies, including categories and retention periods, is provided in Annex 1 of this Policy.

Some cookies are placed by third party services that appear on our pages. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

## 6. Data subject's rights

As a data subject, you have the following rights in accordance with applicable personal data protection legislation and subject to the limitations provided in such legislation:

- the right to receive information about the personal data processed about you;
- the right to rectify personal data if the personal data is incorrect;
- the right to request the erasure of personal data, except where the legislation regulates otherwise (if we have a legal basis for continuing to retain the data);
- the right to request restriction of the processing of personal data;
- the right to object to the processing of your personal data;
- the right to data portability;
- the right to withdraw consent to the processing of personal data at any time, if the processing of personal data is based on consent; and
- the right to file a complaint with the Estonian Data Protection Inspectorate (*Andmekaitse Inspektsioon*) or with the supervisory authority in your place of residence.

If you wish to exercise your rights or if you have any questions, please contact us by using general contacts of Avaron available on our website.

## Annex 1

### Cookie List

<b>Category: Necessary</b>			
Necessary cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.			
<i>PROVIDER</i>	<i>COOKIE NAME</i>	<i>COOKIE PURPOSE DESCRIPTION</i>	<i>MAXIMUM STORAGE DURATION</i>
highcharts.com	_cfuid	This cookie is a part of the services provided by Cloudflare - Including load-balancing, deliverance of website content and serving DNS connection for website operators.	Session
Cookiebot	CookieConsent	Stores the user's cookie consent state for the current domain.	1 year
avaron.com	PHPSESSID	Preserves user session state across page requests.	Session
<b>Category: Statistics</b>			
Statistic cookies help website owners to understand how visitors interact with websites by collecting and reporting information anonymously.			
<i>PROVIDER</i>	<i>COOKIE NAME</i>	<i>COOKIE PURPOSE DESCRIPTION</i>	<i>MAXIMUM STORAGE DURATION</i>
Microsoft	_clck	Collects data on the user's navigation and behaviour on the website. This is used to compile statistical reports and heatmaps for the website owner.	1 year
Microsoft	_clsk	Registers statistical data on users' behaviour on the website. Used for internal analytics by the website operator.	1 day
Google	_ga	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	2 years
Google	_ga_#	Used to send data to Google Analytics about the visitor's device and behaviour. Tracks the visitor across devices and marketing channels.	2 years

**Category: Marketing**

Marketing cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third party advertisers.

<i>PROVIDER</i>	<i>COOKIE NAME</i>	<i>COOKIE PURPOSE DESCRIPTION</i>	<i>MAXIMUM STORAGE DURATION</i>
Meta Platforms, Inc.	_fbp	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.	3 months
Meta Platforms, Inc.	lastExternalReferrer	Detects how the user reached the website by registering their last URL-address.	Persistent
Meta Platforms, Inc.	lastExternalReferrerTime	Detects how the user reached the website by registering their last URL-address.	Persistent
avaron.com	_pmw_persistent_data	Visitor and conversion value tracking	Persistent