

Introduction

In compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 April 2016, this Privacy Policy establishes the terms of use and protection of the information provided by clients or data subjects. The Company is committed to the security of personal data. When we ask you for personal information by which you can be identified, we do so ensuring that it will only be used in accordance with the terms of this document.

Our commitment is to keep your information secure. We use and update our systems to ensure that there is no unauthorised access.

Data Controller

We hereby inform you that the controller responsible for the processing of your data is [Company Name], hereinafter THE COMPANY (or short name to be used and substituted in the following parts of the document).

Company name: GHI GLOBAL ADVISORY PARTNERS A.V, S.L.

Tax ID (CIF): B02915445

Registered office: CALLE SERRANO, Nº 8, SECOND FLOOR, LEFT. MADRID, 28001.

Registered at the Commercial Registry of Madrid, M-732110, IRUS

1000306943672 – Electronic Inscription Sheet 7

You may contact us by any of the following means:

Telephone: +34 91 771 73 88

Email: ana@ghiglobalpartners.com

Information Collected and Its Purpose

The information we collect is necessary for establishing contractual relationships and/or providing you with information about activities, products or services related to THE COMPANY.

We hereby inform you that the personal data provided by the client or data subject, as well as any data that may be provided in the future in the context of their relationship with this COMPANY, relate to:

Purpose: contractual relationships.

The following types of personal data may be collected:

- Identification and contact data
- Information required for the prevention of money laundering, including banking and financial data.
- Information required by securities market regulations for the assessment of investment objectives, knowledge and experience.
- Information derived from transactions in financial instruments or investment services in which THE COMPANY has been involved.
- Identification codes or passwords for access and operations within the COMPANY's systems.
- Data derived from operations carried out.

Purpose: commercial activity and other communications.

The personal data collected are the identification and contact details necessary to send the information. For example, but not limited to: name, surnames, postal address, telephone or e-mail address, depending on the data subject's reception preferences and available delivery options.

Communications regarding activities, products or services may be made by any means, including electronic means. The data subject must explicitly authorise the sending of commercial communications by ticking the corresponding boxes in any of the data request forms, such as those included on our website.

Data Retention

The personal data provided will be retained for as long as necessary to respond to the contractual relationship, to respond to requests or queries made, and in any event for as long as the data subject does not request their deletion, as well as for the time necessary to comply with the applicable legal obligations corresponding to each type of data. The data subject may exercise their rights at any time and may also make a request regarding them.

Pursuant to the obligation arising from the Law on the Prevention of Money Laundering and the Financing of Terrorism, THE COMPANY will retain

personal data for a period of 10 years from the termination of the business relationship.

Recipients

The possible recipients to whom THE COMPANY may disclose personal data are:

- Public and private bodies and institutions to which there is a legal obligation to provide them.
- Third-party service providers with whom a data processing agreement has been entered into.
- Group companies (list them or include link).

We will not transfer your personal data to any third-party company intending to use them for direct marketing actions or similar activities.

Rights of the Data Subject

Any person has the right to obtain confirmation as to whether THE COMPANY is processing personal data concerning them or not. Regarding the data obtained and subject to availability and exceptions where limited by applicable law, the following rights are granted to you:

Right of access: the right to be informed and to request access to the personal data about you that we process;

Right of rectification: the right to request that we correct or update your personal data where it is inaccurate or incomplete;

Right to erasure: the right to request that your personal data be deleted;

Right to restriction of processing: the right to request that the processing of all or some of your personal data be temporarily or permanently suspended;

Right to data portability: the right to request a copy of your personal data in electronic format and the right to transmit such data for use in a third party's service; and

Right not to be subject to automated decision-making: the right not to be subject to decisions based solely on automated processing, including profiling, where the decision may have a legal effect on you or a similar significant impact.

The data subject may exercise these rights by sending an e-mail to ana@ghiglobalpartners.com, duly identifying themselves by sending a photocopy of their national identity document and clearly indicating the right they wish to exercise. They may also make the request by post to the address indicated above.

Finally, we inform data subjects that they may lodge a complaint relating to the processing of their personal data with the Supervisory Authority (www.aepd.es).

International Transfers

In some circumstances, it is possible that THE COMPANY may need to use the services of third parties established outside Spain. Should this occur, THE COMPANY ensures that the transfer of data will be made to countries with a level of data protection equivalent to that of the European Union or, if this is not the case, will use the mechanisms provided for in current legislation to obtain the client's consent or the authorisation for the transfer from the Spanish Data Protection Agency.

Minors

We do not accept minors registering in our systems. Parental or guardian consent is required for minors to be provided with the services offered by THE COMPANY.

Security

THE COMPANY has adopted the technical measures necessary to prevent the alteration, loss, processing or unauthorised access to the personal data provided by the user. However, in the event of any improper access to the data that could entail serious negative consequences for the data

subjects, THE COMPANY will appropriately inform the data subjects within a reasonable period of time so that they may take the measures they deem appropriate, and where necessary, the AEPD (Spanish Data Protection Agency) will be notified.