

KHARIS CAPITAL PRIVACY AND COOKIES POLICY

In the framework of this Privacy and Cookies Policy (the “**Privacy Policy**”), “**Personal Data**” means any personal data as defined in Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data of 14 April 2016 (“**GDPR**”), as well as any applicable national implementing or additional legislation (collectively the “**Data Protection Law**”).

1. Who is the data controller?

The website available at www.khariscapital.com (the “**Website**”) is owned and operated by **KHARIS CAPITAL ADVISORY BELGIUM SPRL**, having its registered office at Avenue Louise 489, 1050 Brussels (Belgium), registered with the Crossroads bank for enterprises under company number 0632.454.351, hereinafter collectively referred to as “**KHARIS CAPITAL**”.

Any reference to “we/us” “our/ours” in this Privacy Policy shall be understood as referring to KHARIS CAPITAL.

This Privacy Policy sets out the conditions under which KHARIS CAPITAL may process your Personal Data, with your consent where necessary. KHARIS CAPITAL is the data controller under the Data Protection Law.

2. What is the purpose of this Privacy Policy?

We attach great importance to your privacy and the protection of your Personal Data. This Privacy Policy explains how KHARIS CAPITAL collects, processes and uses Personal Data related to you when surfing or otherwise using the Website. It assists you in understanding what categories of Personal Data we may collect and with whom the Personal Data may be shared. KHARIS CAPITAL respects your privacy and the way that you choose to provide data. We recognize the need for appropriate protection and management of the Personal Data collected.

By accessing, browsing or using the Website, you agree to this Privacy Policy. You authorize KHARIS CAPITAL to process your Personal Data in accordance with, and for the purposes set forth, in this Privacy Policy. This Privacy Policy is always available on the Website.

We reserve the right to amend this Privacy Policy at any time. You agree to regularly review the Privacy Policy published and accessible on the Website. While amending this Privacy Policy as the case may be, KHARIS CAPITAL will take into consideration your legitimate interests. You will be notified of any changes to the Privacy Policy. By continuing to actively use the Website after such notification, you acknowledge that you are aware of the changes to the Privacy Policy and agree to these. If you do not accept the Privacy Policy (as amended from time to time), you must immediately cease all use of the Website.

3. What Personal Data does KHARIS CAPITAL process?

KHARIS CAPITAL collects your Personal Data in the framework of the provision and the use of the Website. Your Personal Data are collected, processed and used by KHARIS CAPITAL pursuant to this Privacy Policy and encompass the following information:

- 3.1. Browsing Data.** The Personal Data related to your use of the Website: selection of language, ID of the device used to access the website (MAC address), IP address, data on when you use the Website and for how long, information related to your operating system and type of device, pages visited, search criteria.
- 3.2. Newsletter Data.** Personal Data that you provide when subscribing to KHARIS CAPITAL newsletter as the case may be: first and last names, email address and (legal document) acceptance log.

KHARIS CAPITAL does not collect or process any special categories of Personal Data related to you. Special categories of Personal Data are often referred to as “sensitive data” and mean information related to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, health or sex life.

4. For what purposes does KHARIS CAPITAL process Personal Data?

KHARIS CAPITAL collects, processes and uses Personal Data related to you solely for the purposes indicated in this Privacy Policy. Those purposes are providing the Website and related services; managing the relationship between you and KHARIS CAPITAL; processing and answering to your (contact) request(s).

In addition KHARIS CAPITAL may process your Personal Data for monitoring the use of the Website; analyzing the habits of the users; designing additions or new functionalities; enhancing the Website and for market research purposes. To the greatest extent possible, KHARIS CAPITAL

shall process aggregate data (which is data that does neither identify you nor can be linked to you, such as statistic data), pseudonymized or anonymized data, rather than Personal Data, when the purposes of such processing can be achieved in the same way.

If you expressly consent to the use of your Personal Data for commercial communications (KHARIS CAPITAL newsletters – direct marketing purposes), KHARIS CAPITAL will use your Personal Data for the purposes for which you have granted consent until you revoke such consent. More precisely and subject to your express consent when you provide your email address and/or mobile telephone number, KHARIS CAPITAL may send you, by email and/or text message, newsletters and commercial communications regarding KHARIS CAPITAL and/or its activities. If you wish that your Personal Data be no longer processed for direct marketing purposes, you have the right to withdraw at any time your consent to such processing, free of charge and without having to provide a justification. The procedure for doing so is outlined in section 8 of this Privacy Policy.

KHARIS CAPITAL may use your Personal Data for new purposes which are yet unforeseen in this Privacy Policy, either on the basis of an applicable statutory authorization/obligation or of your consent. In any event, prior to using your Personal Data for other purposes, KHARIS CAPITAL will inform you about the changes to this Privacy Policy and, in case of consent-based activities, KHARIS CAPITAL will offer you the possibility to decline participation in these changes.

5. How does KHARIS CAPITAL protect your Personal Data?

We have put in place the required security measures in order to protect the Personal Data obtained through the use of the Website against accidental or unauthorized destruction, loss as well as illicit or unauthorized modification, use, access and other processing. We take steps to maintain the confidentiality of your Personal Data and protect it from unlawful disclosure. KHARIS CAPITAL will not make your Personal Data publicly available without your prior express consent.

6. To whom can KHARIS CAPITAL disclose your Personal Data?

To provide the Website, KHARIS CAPITAL may call upon the services of subcontractors to whom certain Personal Data related to you may be communicated. KHARIS CAPITAL has taken appropriate measures to ensure the protection of aforesaid Personal Data, in accordance with the Data Protection Law. For Example, KHARIS CAPITAL makes use of services of subcontractors for website development/hosting services and for emailing services.

Generally, we will not transfer your Personal Data to third parties, except the transfers (i) authorized under applicable law or (ii) as mentioned in this section 6 or elsewhere in this Privacy Policy. You also consent to the transfer of your Personal Data in the event KHARIS CAPITAL sells or transfers all or a portion of its business or assets to a third party.

To the extent that this involves the transfer of Personal Data to countries outside of the European Economic Area, in countries not considered by the European Commission as ensuring an adequate level of personal data protection, KHARIS CAPITAL shall ensure that measures are put in place in accordance with the Personal Data Law, such as entering into EU Standard Contractual Clauses.

7. How long does KHARIS CAPITAL keep your Personal Data?

KHARIS CAPITAL will not retain your Personal Data for a period longer than necessary to achieve the purposes defined in this Privacy Policy, unless KHARIS CAPITAL has a specific legitimate interest in storing your Personal Data for a longer period (e.g. to the extent the data is required to clarify an alleged infringement of third party rights or to comply with a legal or regulatory obligation). See also section 9 on cookies below.

Your Newsletter Data, as the case may be, will be retained as long as you do not unsubscribe to KHARIS CAPITAL newsletter.

8. What are your rights as data subject?

You are entitled to access to your Personal Data, as collected and processed by KHARIS CAPITAL, and request the modification or suppression thereof if it is incorrect or unnecessary. To exercise these rights, please send your request to KHARIS CAPITAL by email at info@khariscapital.com, together with a copy of your ID or other identification document. In addition, you may object to the processing of your Personal Data for direct marketing purposes (newsletter), as the case may be, at any time, free of charge and without having to provide a justification by following the abovementioned procedure. In general, you are also entitled to withdraw your consent to any processing based thereon, at any time. This withdrawal of consent does however not compromise the legality of the processing based on consent made prior to such withdrawal.

You may exercise these rights free of charge. However, KHARIS CAPITAL may charge a reasonable fee or refuse to act on a request if it is manifestly unfounded or excessive, in particular because of its repetitive character.

If you consider that the processing of your Personal Data infringes the Data Protection Law, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of the European Union of your usual place of residence, your place of work or the place where the infringement occurred. The Belgian supervisory authority is Data Protection Authority (<https://dataprotectionauthority.be/>).

9. Does KHARIS CAPITAL use cookies?

9.1. Definition and categories of cookies

KHARIS CAPITAL uses so-called “cookies” on the Website to improve your navigational experience. Cookies are pieces of data (small electronic text files) stored on the device of the user that contain data about a user or its device. There are different categories of cookies:

- **Necessary / technical cookies:** these cookies are essential to the functioning of the websites as they enable the use of certain parts thereof. For example, they allow you to navigate between different parts of the websites and applications, to complete forms, etc. If you refuse these cookies, certain parts of the websites and applications will not function or will not function optimally. Your prior consent for the use of these cookies is not required.
- **Analytic / statistical cookies – performance cookies:** these cookies allow us to recognize visitors, to count them and to identify the way they navigate. This helps to improve user navigation and ensure that users can find what they need more easily and quickly. Performance cookies are used to collect information about the use the visitor makes of the websites. These cookies help understanding how visitors interact with websites and applications and the reasons for certain error messages. They allow to test new functions. Such information is used to improve the user experience.
- **Functional / preference cookies:** such cookies make websites and applications easier to use, more enjoyable for visitors and give you a more personalized browsing experience. For example, these cookies may remember your language preferences.
- **Tracking / marketing cookies:** these are targeting cookies that allow us to collect statistics on visitors and send them personalized commercial messages, advertisements and promotions.

9.2. Cookies used by KHARIS CAPITAL

In the framework of the use of the Website, cookies may be placed on your device to collect both anonymous data and personal data related to you as specified in this Privacy Policy. When you visit the Website for the first time, information on privacy and wording regarding the consent to the use of cookies will appear on the home page through a “cookie banner” or “cookie pop-up”. By clicking on “Cookie settings”, you can provide your consent per category of cookies. Such consent will be stored in your browser, so that the information of the cookie banner/cookie pop-up does not have to be repeated on every page of the Website or at your next connection. In the event that your consent would no longer be registered in your browser (e.g. in case of suppression of the cookies), the cookie banner/cookie pop-up will appear again the next time you visit the Website.

The Website installs and uses certain technically required cookies on your device which do not require your prior consent. Other cookies (such as cookies to improve the navigational experience by keeping record of certain data (this avoids the user having to reintroduce such data at each connection) and by tailoring the content of the Website to your preferences may be installed and used on the basis of your consent.

Most cookies only work for a session or a single visit. It is also possible for you to set up your browser to be informed during each creation of cookies or to prevent their storage, individually or not. You may set/modify your cookie preferences at any time. However, disabling cookies may prevent access to certain parts of the Website or making such access more difficult or no longer available to you.

KHARIS CAPITAL uses analytics cookies to gather general information on how users use the Website (e.g. which pages they visit most frequently). These cookies do not collect any data that may lead to an identification of the users. All information collected with the aid of such cookies exclusively serves the purpose of understanding and improving the functionality of the Website. KHARIS CAPITAL uses Google Analytics, a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (“**Google**”). The information regarding your use of the Website generated by Google Analytics is usually transmitted to and stored on a Google server in the USA. However, the code “gat._anonymizeIp();” has been added to Google Analytics on the Website to ensure anonymous recording of IP addresses, known as “*IP masking*”. Google IP address anonymization on the Website truncates your IP address within the European Union and European Economic Area territories. Only in exceptional cases will the full IP address be sent to a Google server in the USA and truncated there. Google will use this information on KHARIS CAPITAL’s behalf to analyze your use of the Website, compile reports on Website activity and provide other Website and internet usage-related services. The IP address transmitted by your browser as part of Google Analytics is not merged with other Google data. You can prevent data generated and recorded by the cookie concerning Your use of the Website (including your IP address) from being sent to Google and prevent the processing of these data by Google by downloading and installing the browser plugin available via the link <https://tools.google.com/dlpage/gaoptout>. Additional information on the Terms of Use and Data Privacy Policy of Google Analytics may be found at <https://www.google.com/analytics/terms/> and <https://www.google.com/policies/privacy/partners/>.

The table below lists the first-party and third-party cookies used by KHARIS CAPITAL on the Website:

Storage method	Name	Provider	Category	Purpose	Validity
Cookie	laravel_session	KHARIS CAPITAL	Necessary Cookies	Cookie used to identify a session instance for the user	Session
Cookie	XSRF-TOKEN	KHARIS CAPITAL	Necessary Cookies	Cookie used to help prevent Cross-site request forgery	Session
Cookie	GDPRCookie	KHARIS CAPITAL	Necessary Cookies	Used determine what type of cookies can be used, depending on the ePrivacy level set by the user.to	1 year
Cookie	_gid	Google Analytics	Analytical Cookies	Registers a unique ID that is used to generate statistical data about how the visitor uses the website.	24 hours
Cookie	_ga	Google Analytics	Analytical Cookies	Registers a unique ID that is used to generate statistical data about how the visitor uses the website.	2 years
Cookie	_gat_UA_	Google Analytics	Analytical Cookies	This cookie is associated with Google Universal Analytics and is used to throttle the request rate - limiting the collection of data on high traffic sites.	Session

10. Social network plugins

KHARIS CAPITAL does not make use of direct social network plug-ins on the Website. The Website contain social network platform icons such as the Facebook, Instagram and LinkedIn icons (the “**Social Networks**”). By clicking on these icons, you will be directed to KHARIS CAPITAL’s page on such Social Networks.

KHARIS CAPITAL does not collect any information from the account that you may have on Social Networks. When you visit the Website, data are never automatically transmitted to Social Networks.

We employ an alternative technical solution that allows you to decide whether to transmit data to the Social Networks and when. Only when you actively click on the respective icon yourself will your web browser connect to the servers of Social Networks, i.e. clicking on elements then clicking on the Social Network’s icon indicates your consent to your browser connecting to the servers of such Social Network and sending usage data to that Social Network operator (whether or not you have subscribed to such Social Network).

We have no influence over the nature or scope of data that Social Networks may then gather. For information regarding the purpose and scope of data collection, further processing and use of data by Social Networks and regarding your data privacy rights and relevant configuration settings, see the social networks’ respective data privacy advisories:

- Facebook: <https://www.facebook.com/about/privacy/>.
- Instagram: <https://help.instagram.com/519522125107875>.
- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>.

11. What about links to third party websites?

The Website may create links to other websites, which are not subject to this Privacy Policy. We recommend that you examine the privacy policy applicable to these other websites. We assume no responsibility whatsoever for the Personal Data and privacy practices of such websites and encourages you to review each website’s privacy policy before disclosing any Personal Data.

12. Contact Us

Should you have any question about this Privacy Policy and its implementation on the Website, feel free to contact us by e-mail at info@khariscapital.com.

Last updated in November 2020.