

INDIVIDUAL ASSET MANAGEMENT, INC.
(dba: INTERNATIONAL ASSET MANAGEMENT)

PRIVACY POLICY

Introduction

International Asset Management (hereafter “the Company” or “IAM”) is incorporated and licensed in the state of California, USA as a “Registered Investment Advisor” (RIA). RIA’s are regulated by the government of the state in which they are based or the US Securities and Exchange Commission. As a RIA firm, IAM is held to a higher standard of care with respect to its clients than a brokerage firm. A RIA firm representative has a fiduciary responsibility to his or her clients whereas a broker often does not.

IAM is further bound by the US “Investment Advisor Act of 1940” and adheres to the CFA Institute (formerly the Association of Investment Management and Research) Code of Ethics and Standards of Professional Conduct.

US representatives of RIA firms hold a “Series 65” or “Series 7 & 66” Investment Advisor license and, in addition, all IAM portfolio managers are CFA charter-holders or have a CIMA or other recognized portfolio management qualification.

The Company has established a Privacy Policy (the “Policy”) appropriate to the size and organisation of the Company and the nature, scale, and complexity of the Company’s business.

Purpose and Scope

The Policy is meant for use by International Asset Management clients, prospective clients, and former clients, and by relevant authorities.

IAM is compliant with the requirements of the General Data Protection Regulation as well as other applicable legislation. We have established this Privacy Policy in accordance with the General Data Protection Regulation (GDPR) and laws, regulations, and/or directives issued pursuant to this Law, as well as US privacy policy standards. This policy applies to former, existing and potential clients as well as to any visitors of the Company’s website.

This policy aims to provide you with information on what type of information we collect, how it is used and the circumstances where it could be shared with third parties.

Commitment

The protection of your privacy and personal information is very important to us. This is in relation to personal and financial information and any other data as provided to us by you, whether in paper form, verbally, or electronically.

We are committed to safeguarding any client information we collect, process, and store, applying all reasonable measures, including strict security standards and security technology, to ensure that your personal data will be processed in a manner that provides protection against unauthorized or unlawful processing and against accidental loss, destruction or damage.

Collection of personal data

We collect information required to fulfill our legal and regulatory obligations and to improve our service to you.

To help us offer our services effectively, we gather information and documentation to personally identify, contact, or locate you, as well as information regarding your financial and personal circumstances. This information is gathered from conversations with you, questionnaires we may ask you to complete, and from third parties or other sources.

You are responsible for providing us with true and accurate information and to keep us informed of any changes in your personal information or circumstance by emailing us at: iam@iamadvisors.com.

We are required to evaluate the appropriateness of the financial instruments we offer to you and the suitability of our advice to you based on three main parameters;

1. The sources of your income and wealth, as well as your financial obligations.
2. Your investment knowledge and experience including your objectives, your knowledge and experience of financial markets, and your understanding of the risks involved in investing.
3. Your experience in dealing in complex and non-complex financial instruments, especially your investment and risk attitude as they relate to such financial instruments.

The following is an example of personal data that we may request from you:

- Personal information requested during the registration process such as your name, date and place of birth, citizenship, domicile and residency.
- Marital status, national identification numbers, and contact details.
- Financial information such as your income, source of funds, investment objectives.
- Documents verifying your identity and residential address.

We are obliged by Law to maintain these records for five years after the termination of a client relationship, or up to 7 years upon request by the local competent authority.

Purpose of collecting and processing of personal data

Your personal data is used for specific, explicit, and legitimate purposes and only as required to provide a quality service to you and to comply with applicable legislations as referred to above. The personal data collected from you is used to verify your identity, to construct your economic and investment profile in order to ensure that we provide you with products and services suitable to your requirements, knowledge, and risk appetite, to manage your account with us, to process your transactions, to provide you with post-transaction information, to inform you of additional products and/or services relevant to your economic and personal circumstances, to produce analyses and statistical data which helps us improve our products and services, and for website improvement purposes. These are necessary for the entry into or performance of our contract once signed. We will carry out regular checks to ensure that our systems are working as intended.

Affiliates and Partners

Clients acknowledge and consent that the Company and its partners, affiliates, and/or associates, may share information in a manner that is useful and relevant in relation to one of the following purposes:

- a) Reasonably required by such affiliate, partner and/or associate of the Company to provide products and services to its clients,
- b) To offer additional similar products and services that meet clients' needs

At a client's request the Company may disclose the client's personal information to any organisation or to any persons acting on behalf of the client, including client's financial advisor, broker, solicitor or accountant.

The Company may disclose clients' personal information to companies hired by the Company to provide limited services on behalf of the Company, including but not limited to postal or email services. The Company will take all reasonable measures to ensure that the said companies will only use the personal information/data as necessary to deliver the service and not for any other purpose.

Non-affiliated third parties

The Company may disclose information to non-affiliated third parties where necessary in order to carry out the following internal functions of the Company:

- a) Use of specialized agencies to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to its business.
- b) Use of customer relationship management, financial planning, and portfolio management and reporting software.
- c) Trading and custody of client accounts.

Use of “Cookies”

The Company may use cookies to assess and improve the performance of the website and its products and services offered to its clients. Cookies are used by most internet browsers and are small pieces of information which use a unique identification tag and are stored on clients' device as a result of clients using the Company's website or other services the Company provides to its clients.

Clients may be able to refuse to have cookies stored on their device they may be able to change the setting of their browser to refuse all cookies, and/or have their device to notify them each time a cookie is sent to their device. Controlling their cookies in this way may impair the quality of service provided by the Company to its clients and therefore it is recommended for clients to allow cookies on their device to ensure the best possible experience and quality services provided by the Company.

Contact Clients/Recordings

The Company may contact clients or prospective clients by telephone, email, or other means for the purpose of offering them further information about the Company's products and services and/or informing clients of unique promotional offerings. The client consents to the receipt of such contact.

For regulatory and quality assurance purposes, any type of communication between clients and the Company whether in writing, email or by telephone or other means of medium shall be monitored and may be recorded by the Company. Clients accept that such recordings constitute conclusive evidence of the Orders/Instructions/Requests or conversations so recorded.

Who controls and processes your personal data

IAM, and any undertakings being a member of our group or agents which we engage with for the purpose of collecting, storing, and processing, personal data and any third parties acting on our or their behalf, may collect, process, and store, personal data provided by you.

For the purpose of processing and the storage of personal data provided by you in any jurisdiction within the European Union or outside of the European Union, IAM can confirm this will be done in accordance with applicable laws.

IAM can confirm that if it contracts any third party a written contract will be in place and this privacy statement will be updated accordingly. The contract is important so that both parties understand their responsibilities and liabilities. The GDPR sets out what needs to be included in the contract which IAM has adhered to, the below is not an exhaustive list of the obligations of all relevant parties;

- The third party must only act on the written instructions of IAM (unless required by law to act without such instructions);
- Ensure that people processing the data are subject to a duty of confidence;
- Take appropriate measures to ensure the security of processing;
- The rights of clients will not be impaired in meeting with GDPR requirements;
- The security of processing, the notification of personal data breaches and data protection impact assessments will not be impaired;
- Deletion or return of all personal data as requested at the end of the contract;

IAM has a regulatory obligation to supervise and effectively oversee the outsourced functions and its obligation to take appropriate measures when it determines that the service provider is not performing the said functions effectively and in accordance with the applicable legislation.

We may use or disclose personal information without your consent only in certain circumstances:

- If required by law or by order of a court, administrative agency, or other government entities.
- If there are reasonable grounds showing disclosure is necessary to protect the rights, privacy, property, or safety of users or others.
- If IAM believes the information is related to a breach of an agreement or violation of the law, that has been, is being, or is about to be committed.
- If it is necessary for fraud protection, risk reduction, or the establishment or collection of funds owed to IAM.
- If it is necessary to enforce or apply the Terms and Conditions and other agreements, to pursue remedies, or to limit damages to IAM.
- For other reasons allowed or required by law.
- If the information is public.

When we are required or permitted to disclose information without consent, we will not disclose more information than necessary to fulfill the disclosure purpose.

IAM informs all clients to maintain confidentially and not share with others usernames and private passwords. IAM bears no responsibility for any unlawful or unauthorized use of clients' personal information due to the misuse or misplacement of clients' access codes (i.e. passwords /credentials), negligent or malicious, however conducted.

Your rights

Rights to Access:

You have the right to request copies of your personal data.

Information must be provided without delay and at the latest within one month of receipt. IAM will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, IAM will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

Can IAM charge a fee for dealing for an access request?

IAM must provide a copy of the information free of charge. However, a "reasonable fee" can be charged when a request is manifestly unfounded or excessive, particularly if it is repetitive.

The fee, if applied, will be based on the administrative cost of providing the information.

If at any time, IAM refuses to respond to a request, we will explain why, informing clients of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

When information is provided:

IAM will verify the identity of the person making the request using reasonable means based upon data provided by you.

Right for rectification;

When should personal data be rectified?

Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.

The GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. You can make a request for rectification verbally or in writing.

If IAM has disclosed the personal data in question to others, we must contact each recipient and inform them of the rectification unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the client about these recipients.

How long does IAM have to comply with a request for rectification?

IAM must respond within one month.

This can be extended to two months where the request for rectification is complex.

Where IAM is not taking action in response to a request for rectification, we must explain why to the client, informing them of their right to complain to the supervisory authority and to a judicial remedy.

Your right to erasure;

When does the right to erasure apply?

The right to erasure does not provide an absolute 'right to be forgotten'. Individuals have a right to have personal data erased and to prevent processing in specific circumstances:

- Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
- When the individual withdraws consent.
- When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
- When the personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
- When the personal data has to be erased in order to comply with a legal obligation.
- When the personal data is processed in relation to the offer of information society services to a child.

There are some specific circumstances where the right to erasure does not apply and IAM can refuse to deal with a request

IAM has a legal obligation to obtain data on you meeting with its regulatory obligations. Based on the legal obligations imposed on IAM, clients or former clients may have no right to erasure, no right to data portability, or no right to object to the information gathered in meeting with IAM's legal obligation under its license to provide financial services.

When can IAM refuse to comply with a request for erasure?

IAM can refuse to comply with a request for erasure where the personal data is processed for the following reasons:

- To comply with a legal obligation for the performance of a public interest task or exercise of official authority.
- For the exercise or defense of legal claims.

Does IAM have to tell other organizations about the erasure of personal data?

If IAM has disclosed the personal data in question to others, we must contact each recipient and inform them of the erasure of the personal data unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

Your right to restrict processing;

When does the right to restrict processing apply?

IAM will be required to restrict the processing of personal data in the following circumstances:

- Where an individual contests the accuracy of the personal data IAM should restrict the processing until the accuracy of the personal data has been verified.
- Where an individual has objected to the processing (where it was necessary for the performance of a public interest task or purpose of legitimate interests) and IAM is considering whether IAM organization's legitimate grounds override those of the individual.
- When processing is unlawful and the individual opposes erasure and requests restriction instead.
- If IAM no longer needs the personal data but the individual requires the data to establish, exercise, or defend, a legal claim.

IAM may need to review procedures to ensure we are able to determine where we may be required to restrict the processing of personal data.

If IAM has disclosed the personal data in question to others, we must contact each recipient and inform them of the restriction on the processing of the personal data unless this proves impossible or involves disproportionate effort. If asked to, we must also inform the individuals about these recipients.

IAM must inform individuals when we have decided to lift a restriction on processing.

Your right to data portability:

- The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- It enables consumers to take advantage of applications and services which can use this data to find them more favorable terms or help them understand their spending habits.
- IAM will respond without undue delay, and within one month. This can be extended to two months where the request is complex or where IAM may receive a number of requests. IAM will inform the

individual within one month of the receipt of request and explain why the extension is necessary, if applicable.

- Where IAM is not taking action in response to a request, we will explain why to the individual, informing them of their right to complain to the supervisory authority and to a judicial remedy without undue delay and at the latest within one month.

Right to object:

Individuals have the right to object to:

- Processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling).
- Direct marketing (including profiling).
- Processing for purposes of scientific/historical research and statistics.

IAM will stop processing the personal data unless:

- IAM can demonstrate compelling legitimate grounds for the processing, which override the interests, rights and freedoms of the individual; or
- The processing is for the establishment, exercise or defense of legal claims.

IAM does not process your personal data for marketing purposes.

IAM does not process your personal data for research purposes.

Raising a concern:

You have the right to be confident that IAM handles your personal information responsibly and in line with good practice.

If you have a concern about the way IAM is handling your information, for example if you feel we:

- May not be keeping your information secure.
- May be holding inaccurate information about you.
- May have disclosed information about you.
- May be keeping information about you for longer than is necessary.
- May have collected information for one reason and are using it for something else.

Please contact us to discuss your concern.

IAM takes all concerns seriously and will work with you to resolve any such issues.

Any concerns and/or requests can be raised to IAM's appointed contact person, as stated below:

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If you are not satisfied with any responses provided by IAM you have the right to raise such matters with the **Data Protection Commissioner** in your country of residency.