

PRIVACY AND DATA PROTECTION POLICY



Eticos Compliance Inc. is a consultancy company based in Panama that provides counseling on Panamanian compliance regulations. Eticos Compliance Inc. carries out the best practices regarding personal data protection, especially those related to Law 81 of March 26, 2019 on Personal Data Protection.

Eticos Compliance Inc. may modify this policy based on regulatory requirements or compliance with implemented and adopted international norms and standards, which will be available at www.eticoscompliance.com

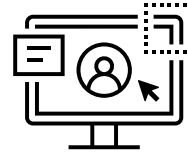
Eticos Compliance Inc. may collect certain personal data through your visits to our website.

- In the course of client onboarding procedures and through customer due diligence procedures carried out for compliance purposes.
- When you request information from us or engage with our services.

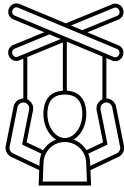
The personal data that could be collected may include:

- Contact details: name, address, occupation/main economic activity, telephone and fax numbers, and email address(es);
- Billing information: credit card numbers and bank account details;
- Customer Due Diligence details: information we are legally required to request for compliance purposes (due to anti-money laundering and finance of terrorism legislation);
- Publicly available information: information collected from compliance search engines and public databases.

By engaging our services, you are giving your consent in using the data for the purposes for which such data was collected.



PERSONAL DATA COLLECTION



USE OF PERSONAL DATA

Eticos Compliance Inc. will use your personal data for the provision of our professional services. In the course of our business relationship, we may use your personal data for:

- Client onboarding procedures: we may use your personal data for the purpose of carrying out internal conflict checks and anti-money laundering searches.
- Compliance purposes: we may use your personal data in order to comply with our legal obligations imposed to us in the jurisdictions we operate.
- Provision of services: we may use your personal data to fulfill our obligations according to our services agreement.
- Supervision purposes: We may use your personal data in order to comply the requirements of the Superintendency of Non-Financial Subjects of Panama.
- Operation of our business: we may use your personal data in the course of operating our business including the management of our relationships with third party suppliers and clients' intermediaries.
- Legal defense: we may use your personal data to protect our legal rights and/or comply with court orders.

You have the following rights with respect to your personal data and the manner in which such data is treated by Eticos Compliance Inc.:

- The right to access your personal data at all times and the right to request a copy of such data;
- The right to rectify your personal data;
- The right to request (and obtain) deletion of your personal data; and
- The right to restrict or object the processing of your personal data.

If you wish to exercise any of your data protection rights, present a complaint or ask any question



RIGHTS TO YOUR PERSONAL DATA

related to data protection issues, you may contact us at info@eticoscompliance.com



RETENTION OF PERSONAL DATA

We keep your personal data for as long as it is required for the purposes for which such data was collected, and to comply with the applicable statutory requirements on record-keeping measures.