

Noemon Finance Ltd

**PRIVACY POLICY – GENERAL DATA
PROTECTION REGULATION (“GDPR”)**

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1. Introduction

Noemon Finance Limited is a private limited company incorporated in the Republic of Cyprus (Registration Number HE 427234), authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) as a Cyprus Investment Firm (CIF) under licence number 449/24. Noemon Finance Limited (hereinafter the “Company”, “we”, “our”, or “us”) is committed to protecting the privacy and security of your personal data in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council (“GDPR”) and relevant local data protection legislation.

This Privacy Policy (the “Policy”) applies to existing and potential clients, as well as to visitors of the Company’s website.

Personal Data under the GDPR is defined as any information relating to an identified or identifiable natural person (“Data Subject”). An identifiable natural person is one who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

When collecting your personal data, the Company acts as a “Controller” and as such it determines the purposes and means of the processing of your personal data.

“Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

The Policy explains what type of personal data we collect about you, the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided to us, how that data is used and what rights you have in relation to your personal data.

If you are a legal entity providing to us personal data of any individual or where you are an individual providing us with personal data of any individual other than yourself, by requesting to open an account with us, you undertake and represent that:

- i. such person, whose personal data is collected, stored and processed, has been informed of and has given their consent to such collection, storage and processing of their personal data in accordance with the provisions contained herein and
- ii. such person has been informed of their rights in relation to their personal data which is held and processed in accordance with the provisions contained in this Policy.

Any information and/or documentation you submit to us through the use of a form or other device on our website will be used exclusively by us, our employees, suppliers, agents, affiliates and any third-party service providers as required to enable us to provide our services to you or respond to your inquiries or requests.

We will not sell, distribute or disseminate any personal information and/or documentation provided to us through the use of our website or otherwise, to any unaffiliated third-party without your prior consent, unless such disclosure is required for the reasons included in Paragraph 4 of this Policy.

2. [How do we collect your personal data?](#)

We collect personal data of potential clients directly from them, through the use of questionnaires, other required forms or agreements when they apply to open an account with us, through any correspondence we have with them regarding the services we provide and the products we offer, as well as from reliable public sources.

We also collect personal data from third parties. In this regard, when you register to open an account with us and you provide us with an identification document, we use online databases owned and/or administered by third parties to verify your identity. Where your personal data are disclosed to such third parties, all necessary actions and reasonable measures are taken to ensure that processing is performed in accordance with the GDPR.

If you are a client of a company affiliated with us and have expressed interest in our products or services, we may obtain directly from our affiliated company any information and documentation you have provided to them that is necessary to fulfil our Anti-Money Laundering (“AML”) and Counter Financing of Terrorism (“CFT”) obligations. We may also collect any other information provided directly to such an affiliated company as appropriate. This will enable us to provide you with a seamless customer experience.

Finally, some personal data are collected automatically through cookies when you visit or use our website. These personal data include your Internet Protocol (IP) address.

3. What personal data do we collect?

The personal data we collect about you include but are not limited to full name, residential address, date of birth, email address, phone number(s), nationality, tax residency, employment status, IP address. The collection of this personal data is required to enable us to facilitate the evaluation of your application, and conduct the Know Your Customer (“KYC”) and Customer Due Diligence (“CDD”) process, as required by the AML/CFT laws and regulations applicable to us.

As part of our verification procedure which we perform in accordance with the requirements of the applicable AML/CFT laws and regulations, we also collect documentation necessary to verify:

- a) your identity (e.g. Identification Card, Passport, Driver’s License, or Residence Permit) and
- b) your residential address (e.g. utility bill, bank statement, or a rental agreement).

The information contained in such documentation can also be verified by matching it with background information we receive about you from public sources or from other entities not affiliated with the Company.

In addition, we collect information about the anticipated and actual volume and value of your transactions with us, the size and source of your funds and size of wealth, as required for the construction of your economic profile.

Finally, we collect information from visitors of our website through the application of cookies. Further information on the cookies used by the Company's website and what type of information each collects about the visitor, can be found in our Cookies Policy available on our website.

4. Processing of personal data – Why we collect your personal data?

The personal data collected are used by the Company:

- to enable us to offer services to potential clients and / or to continue to offer services to existing clients as we are required to conduct CDD both before the establishment of a business relationship and on an ongoing basis thereafter;
- to provide the client with the services and products requested in accordance with the client's characteristics and needs and to perform the Company's contractual obligations in accordance with our Client Agreement;
- for the detection and prevention of crime (including but not limited to the prevention of fraud, Money Laundering, Terrorist Financing);
- for the purposes of compliance with applicable legal and regulatory obligations to which the Company is subject, including responding to requests from the CySEC, other competent supervisory authorities, and law enforcement authorities;
- for loss prevention or to protect our rights, privacy, safety, or property, or those of other persons in accordance with our legitimate interests;
- for marketing purposes provided that you have given us your prior specific consent;
- for record keeping purposes to enable us to comply with obligations imposed on us by any national, European or supranational legislation.

5. Whom do we share your personal data with?

Your personal data may be shared or disclosed to external associates, such as legal advisors and auditors and other service providers assisting us to perform our duties and ultimately, provide our services to you, or for compliance with legal and regulatory obligations.

Your personal data may be shared with any company affiliated to us and their respective legal, accounting, tax and financial advisors where such information is reasonably required for setting up, verifying and managing your account.

Your personal data may also be disclosed to non-affiliated third parties as reasonably required to enable them to provide us with certain services, such as payments processing and verification of information. The processing of your personal data by any such non-affiliated third parties shall be based on our instructions and shall be subject to appropriate agreements and arrangements to ensure data protection in compliance with this Policy.

Where you have been introduced to us by a third-party business introducer, such business introducer may have access to your personal data. In such a case, we may share your personal data with that business introducer for the legitimate purpose of complying with the obligations under the business introducer agreements between us and the business introducer.

We will share your personal data with other third parties when we believe it is required to do so to enable us to comply with legal and regulatory obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include authorities outside your country of residence.

You acknowledge and accept that the Company is required under the US Foreign Account Tax Compliance Act ("FATCA") to disclose, as applicable, information in relation to any US reportable persons to the relevant authorities.

6. Data transfers to a third country

Where your personal data is transferred by us to a country outside the European Economic Area ("EEA"), we will apply appropriate safeguards by assessing whether the destination country provides an adequate level of data protection. Where the level of protection is not considered adequate, we will implement measures, such as the use of Standard Contractual Clauses ("SCCs") or other appropriate safeguards, to protect your data during the transfer.

7. How long do we retain your personal data for?

We will retain your personal data for as long as necessary to fulfil the purposes we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. Unless otherwise required by any applicable law, regulatory or enforcement authority, we will keep your personal data for five (5) years after the termination of your business relationship with us.

If you have consented to receive marketing material from us, you may withdraw your consent at any time by sending us a written request to dpo@noemon.finance. Upon receipt of your request, we will remove your contact information from our marketing list and you will no longer receive any marketing communications from us.

8. Your rights under the GDPR

Under the GDPR, you, as a data subject, have the following rights:

- a) Right of Access to Personal Data: You have a right to request a copy of the personal data we hold about you. Upon a relevant written request submitted to us by you, we will provide you free of charge with a copy of your personal data processed by us.
- b) Right of Rectification of Personal Data: You can request us to rectify and correct any Personal Data that we are processing about you which is not accurate.
- c) Right of Erasure of Personal Data: You have a right to request us to erase your personal data. However, we will not be able to satisfy such a request where we have to comply with a legal obligation to retain the personal data.
- d) Right of Restriction of processing of Personal Data: You have the right to request us to suspend the processing of your Personal Data in the following cases:
 - If you want us to verify the accuracy of your personal data;
 - Where the processing of your personal data is unlawful but you do not want us to erase it;

- Where you need us to hold the data even if we no longer require it, so as to be able to establish, exercise or defend legal claims; or
 - If you have objected to the processing of your personal data by us, but we need to verify whether we have overriding legitimate grounds to use it.
- e) Right to Data Portability: You have the right to obtain the Personal Data that you have provided to us in a structured, commonly used and machine-readable format and transfer it to another organisation. You also have the right to have your Personal Data transferred by us directly to the organisation of your choice, if this is technically feasible.
- f) Right to Object to the processing of your Personal Data: You have the right to object to the processing of your Personal Data by us, on grounds relating to your particular situation, where we are relying on a legitimate interest pursued by us or by a third party. We will satisfy your request, unless we can demonstrate that we have compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.
- g) Right relating to automated decision making and profiling: You have the right not to be subject to a decision which is based solely on automated processing (including profiling) where that decision produces a legal effect or otherwise significantly affects you. This right means you can request us to involve one of our employees or representatives in the decision-making process. The Company does not take such automated decisions.
- h) Right to withdraw any consent given to us.
- i) Right to complain: If you have grounds to believe that the Company does not process your personal data in an appropriate manner, you have the right to submit a complaint. Complaints can be sent by post at 9 Foti Pitta, 2nd Floor, Office 201, 1065 Nicosia, Cyprus. or by email to dpo@noemon.finance. You can also make a formal complaint to the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus (www.dataprotection.gov.cy).

9. How we protect your Personal Data

The protection of the privacy and confidentiality of your personal information is of utmost importance to us. We take appropriate security measures to protect the personal data transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures are as follows:

- We have established and maintain policies, procedures and controls to ensure high levels of protection of personal data. These include, inter alia, appropriate restrictions on permissions of access to personal data, controls and monitoring of storing and distribution of data;
- Personal data stored in electronic format are securely controlled by password protection;
- Any soft copies of personal data shall be stored and backed up in encrypted data centres both domestically and within or outside the EU. Irrespective of the location of the servers, the Company undertakes to have adequate organizational and security measures to ensure the protection of your personal data;
- We implement a clean desk policy. Physical documents containing personal data shall not be left unattended and shall be stored in secure places.
- We limit access to personal data on a need-to-know basis. The Company's employees have access to personal data only and to the extent required to fulfil their duties. Those processing your personal data will do so only in an authorised manner and are bound by a duty of confidentiality. We have procedures in place to deal with any suspected data security breach. We will notify you and the Data Protection Commissioner of any suspected data security breach where we are legally required to do so.
- We enter into Data Processing Agreements with third parties required to enforce or apply our Terms & Conditions or other agreements relevant to the provision of our services to you.

10. Annual Review and Update

The Company will review its Privacy Policy annually. The Company reserves the right to amend this Privacy Policy at any time without further notice, provided that any changes

made thereto do not significantly affect your rights under the Privacy Policy. If the Company makes significant changes to this Privacy Policy, the updated version will be posted on the Company's website. The new version of the Policy will include the revision date (month/year), clearly displayed on each page of the document. Any revised Policy will be effective immediately upon being published on the Company's website.

11. Contact Us

If you have any inquiries or wish to exercise any of your rights under the GDPR, or even submit any complaints with regards to the processing of your personal data by us, please contact the Company's Data Protection Officer (DPO) by post at 9, Foti Pitta, 2nd Floor, Office 201, 1065, Nicosia, Cyprus or by email at dpo@noemon.finance