

## **Privacy Policy**

This Privacy policy defines our work with your data when you register or visit our site or sites and pages related to it.

The Policy also includes information concerning persons whose personal data can be processed by us during selection of candidates for the vacancies in the company.

### **Implementation of Privacy Policy**

This Privacy Policy defines our work with personal data, which we collect or receive from third persons and purposes with which we process your personal data. The Privacy Policy also defines your rights in our processing of personal data.

The Privacy Policy will inform you of personal data collected by us and your possibility to send us a request for deleting, renewal, transferring or/and granting access to these data.

Please pay attention to the fact that Privacy Policy applies only to personal data collected on this website.

### **Administrator of personal data**

The administrator of personal data is "FOCUS ESTATE MANAGEMENT" LLC, registration number: B238771, address: 2C, Parc d'Activités Str., 8308, Capellen, Luxembourg, hereinafter referred to as the Company. Personal data will be processed by the Company for the purpose of providing the "Information Bulletin" service, in accordance with Art. 6 seconds 1 point b and f of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, as well as on the repeal of Directive 95/46/EC (GDPR), i.e. for the performance of a contract (even if concluded orally or through adopted regulations), as well as for legally justified purposes, such as customer identification and possible complaint handling. Personal data may be disclosed to employees or partners of the Company and entities that provide support to the Company on the basis of the provision of outsourcing services and in accordance with concluded commission agreements. Personal data processed by the above will be processed during the period of using the service and for archiving purposes for 10 years. Everyone has the right to access their data and correct, delete, limit processing, the right to transfer data or object to their processing, the right to withdraw consent at any time, without affecting the legality of data processing before its withdrawal. The data subject has the right to file a complaint with the President of the Office for Personal Data Protection if he believes that the processing of his personal data violates the provisions of the GDPR. Providing personal information is voluntary.

## **Our contacts**

If you have questions concerning the Privacy Policy:

Mail: info@focus.fund

Address: 2C, Parc d'Activités Str., 8308, Capellen, Luxembourg

## **Definitions**

Personal data – information or the totality of information about a person that is identified or can be specifically identified.

Cookie files – small data files which are transferred to the browser from the site you've visited. Cookie files allow to compare and understand the way users perform navigation of the web-site and how they can improve navigation process; they help the site to remember information about you, for example the language you choose to review the site, to open the site with the language you've chosen at the first place upon your next visit; they allow to save the settings of advertising preferences and safe searching; to choose the announcements that are interesting for the users and to calculate the quantity of visits per page. They are also needed for registration in Google services and ensuring of safety of personal data.

## **Purpose of data collection**

The purpose of personal data collection and cookie files is:

- The possibility to facilitate site navigation.
- Improvement of site functioning.
- Ensuring of the site's ability to remember the options you choose (for example, your user name, language or region of your location) and provide expanded, more personal or individual services.
- Delivery of advertising that is connected to you and your interests, which are defined in accordance with analysis of the web-pages you've viewed.

## **Personal data protection**

We implement all the necessary means to preserve safety of personal data, which we receive, so we've provided the appropriate policies, rules and technical means of informational safety for personal data protection from unauthorized access, illegitimate usage or disclosure, unauthorized changes or illegal elimination or accidental loss.

## **Granting access to your information**

By request through the feedback form placed on the Contacts page you can:

- Receive access to your personal data.

- Renew or delete your personal data.
- Cancel permission for usage of your personal data and cookie files.

You can also refuse from or limit usage of cookie files with the help of browser settings. However, in that case some functional capabilities of the site can become unavailable for use.

By the link below you can review the manual on blocking of cookie file use in your browser and/or deleting of cookie files:

- Chrome: <https://support.google.com/chrome/answer/95647>
- Internet Explorer: <http://windows.microsoft.com/en-US/windows-vista/Block-or-allow-cookies>
- Mozilla Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
- Safari: <https://www.apple.com/legal/Privacy/en-ww/cookies/>

### **Categories of third persons to which your data can be transferred**

We can share your data with the following categories of persons:

- FOCUS ESTATE FUND and FOCUS ESTATE MANAGEMENT companies employees.
- External services – mailing lists, Google Analytics.
- Third persons to which we outsource performance of some tasks.

Upon request and in case of availability of the necessary documents we are obliged to grant access to your data:

- To government bodies.
- To the regulators/tax-collecting bodies/state recorders.

We conduct inspections and conclude contracts with the contractors upon ensuring that they perform proper processing of personal data in accordance to our legal obligations.

### **Informing the users about changes in the section related to collection, processing and storage of cookie files and personal data**

We can change the Privacy Policy depending on renewal of the method of collection, processing and saving of cookie files and personal data or for the purpose of conformity with the requirements of current legislation or regulatory bodies.

To ensure your awareness if the Privacy Policy has been changed, an informational window with a link to the renewed Policy will appear on the site.