

**EuroConsult Capital, LLC**  
**767 Third Avenue**  
**19th Floor**  
**New York, NY 10017**

Under the EU's General Data Protection Regulation (GDPR) personal data 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, in particular 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 you use EuroConsult Capital, LLC (“EC M&A”) as your broker/dealer, you entrust us not only with your hard-earned assets but also with your personal and financial data. We consider your data to be private and confidential, and we hold ourselves to the highest standards of trust in their safekeeping and use.

We collect non-public personal information about EuroConsult Capital, LLC clients such as you, from the following sources:

- Information we receive from you on applications or other forms;
- Information about your transactions with us, our affiliates, or others;
- If you visit our web site, information we collect via a web server, often referred to as a “cookie.” Cookies indicate where a site visitor has been online and what has been viewed; and
- External data sources including company websites, government registrars, LinkedIn and others.

We take care to source businesses that want to work with us, and we work hard on behalf of our clients to ensure we build effective and beneficial relationships with all current and potential business contacts. We use a variety of openly available information listings in a responsible and appropriate manner, respecting privacy and platform terms of engagement at all times.

We do not disclose any non-public personal information about our customers or former customers to anyone, except to affiliates, as permitted or required by law, or for regulatory compliance. Moreover, we will not release information about our customers or former customers unless one of the following conditions is met:

- We receive your prior written consent;
- We believe the recipient to be you or your authorized representative; or
- We are required by law to release information to the recipient.

In terms of being contacted for marketing purposes EC M&A would contact you for additional consent. We only use information about you and your account to help us better serve your investment needs or to suggest services or educational materials that may be of interest to you.

EC M&A will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. EC M&A is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

To further protect your privacy, our website uses security programs and devices, which we believe to be in accordance with current business practices, including data encryption, user names and passwords, and other tools. We maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized EuroConsult Capital, LLC associates who have a need for these records. We advise you not to send such information to us in non-secure e-mails.

### **Confidentiality and Security**

We maintain physical, electronic and procedural safeguards to guard your personal account information. We also restrict access to your personal and financial data to authorized EuroConsult Capital, LLC associates who have a need for these records. We require all nonaffiliated organizations to conform to our privacy standards and they are contractually obligated to keep the information provided confidential and used as requested. Furthermore, we will continue to adhere to the privacy policies and practices described in this notice even after your account is closed or becomes inactive.

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws.

## Requesting your Data

EC M&A at your request, can confirm what information we hold about you and how it is processed. If EC M&A does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organization that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of EC M&A or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organization, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

EC M&A accepts the following forms of ID when information on your personal data is requested:

- Passport or other government documentation
- Birth certificate

**Contact details of the Data Protection Officer / GDPR Owner:**

**Supervisory authority contact details**

Evan Yellin  
23 Berkeley Square  
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**GDPR owner contact details**

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