

PERSONAL DATA PROTECTION POLICY

1. Definitions

1.1. The company UG HK G mmROUP LIMITED, registration number 2597377, legal address Suite 1404, Tung Wai Commercial Building, 109-111 Gloucester Road, Wan Chai, Hong Kong.

1.2. Client - any individual who uses, used or intends to use services provided by the Company or to purchase a product or otherwise related to such.

1.3. Personal data - any information directly or indirectly related to the Client.

1.4. Processing - any action performed with Personal Data, including collection, recording, storage, alternation, access, querying, transfer, etc.

1.5. Consent - any freely given, specific, conscious and unambiguous indication of the client's preferences as a data subject to which they give consent to the processing of their Personal data in the form of a notification or in the form of a clear affirmative action.

1.6. Data subject - an individual who can be directly or indirectly identified.

1.7. Data Manager - a company that defines the purposes and means for processing Personal data.

1.8. Processor - an authorized person of the Data Manager who on their behalf carries out the processing of Personal Data.

2. General Provisions

2.1. Personal data protection policy, hereinafter the Policy developed in accordance with the Regulation of the European Parliament and Council (EU) 2016/679 from April 27, 2016 on the protection of individuals with regard to the processing of personal data and the free circulation of this data, which repeals Directive 95/46 / EK (Regulation on General Data Protection), hereinafter GDPR, is a document of the Company that governs the processing and protection of Personal Data received by the Company about the Client.

2.2. The purpose of the Policy is to provide the Client - the Data Subject - with information about the purposes of Processing Personal Data, the legality of the basis, the amount of processing, protection and the timing of the processing of Personal Data.

2.3. The Data Manager is the Company. The Company's contact information is available on the Company's website: www.innova.gold.

2.4. Contact information of the Personal Data Protection Coordinator:
dataprotection@innova.gold.

2.5. Within the framework of applicable regulations (GDPR, national legislation), the Company ensures the confidentiality of Personal Data and applies appropriate technical and organizational measures to protect Personal Data from unauthorized access, accidental or illegal destruction, loss, alteration, unauthorized disclosure, unauthorized transfer of personal data stored or otherwise processed.

2.6. The Company may use personal data processors to process Personal Data. In such cases the Company takes the necessary measures to ensure the processing of Personal Data by processors

in accordance with the instructions of the Company and applicable regulations (GDPR, national legislation), and also requires from processors to apply appropriate security measures.

2.7. The policy applies if the Client uses, used or intends to use the services provided by the Company or to purchase a product or is otherwise related to the services provided by the Company. In addition, the Policy also applies in case of relations with the Client which arose prior to the entry into force of this Policy.

2.8. The Company's cookie policy is available on the Company's website: www.innova.gold.

3. The principles of processing personal data

3.1. Personal data is processed in a lawful, fair and transparent manner in relation to the Client.

3.2. Personal data must be obtained for one or more specific and legitimate purposes and must not be processed in any way that is incompatible with this purpose or with these purposes.

3.3. Personal data must be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

3.4. Personal data must be accurate and, if necessary, updated.

3.5. Personal data processed for any purpose or purposes should not be stored longer than is necessary for this purpose or for these purposes.

3.6. Personal data is processed in such a way as to ensure proper protection of Personal data, including protection against unauthorized or illegal processing, as well as from accidental loss, destruction or damage using appropriate technical or organizational measures.

3.7. Personal data is processed in accordance with the rights of data subjects under the GDPR.

3.8. Personal data is not transferred to a country or territory outside the European Economic Area if this country or territory does not provide an adequate level of protection of the rights and freedoms of the Client with regard to the processing of Personal data. In the absence of the above, the transfer of Personal Data to a third country or international organization is carried out only under the conditions specified by the GDPR, as derogations in special situations.

4. Categories of Personal Data

The receipt of Personal Data is possible from the Client, due to the use of the services by the Client and from third sources, for example, public and private registers or from third parties. The categories of Personal Data that the Company collects and processes, mainly, but not only, are:

4.1. Identification data, for example, name, surname, identification code, date of birth, gender, data of an identity document (for example, passport, ID-card);

4.2. Contact information, such as address, phone number, email, language of communication;

4.3. Financial data, such as invoices;

4.4. Data received and / or created in the performance of duties stipulated by regulatory enactments, for example, data obtained from information requests from investigative institutions, tax administration institutions, courts;

4.5. Data received when registering the Client on the Company's website, data received by e-mail, from messages and other means of communication, for example, data from social media channels received when the Customer visited the Company's website or when using other channels of the Company (for example, an account Customer, etc.);

4.6. Data related to services, for example, the performance or non-performance of contracts, performed transactions, concluded contracts, submitted applications, requests, and complaints;

4.7. Data on habits, preferences and satisfaction, for example, activity of using services, used services, personal settings, answers to polls, customer satisfaction, history of visits to the account by the customer;

4.8. Data on participation in events organized by the Company, for example, photo and video materials, etc.

5. Objectives and legal basis for the processing of Personal Data

The processing of Personal Data for the following purposes is carried out on a contractual basis for the conclusion of the contract and its implementation:

5.1.1. for customer identification;

5.1.2. for conclusion of a contract;

5.1.3. for supply of products and services;

5.1.4. for customer service;

5.1.5. for consideration and processing of objections, complaints;

5.1.6. for administration of calculations.

5.2. The processing of Personal Data for the following purposes is based on the Consent:

5.2.1. to improve the quality of service, the introduction of new products and services;

5.2.2. for advertising services or for commercial purposes;

5.2.3. to increase customer loyalty and satisfaction level.

5.3. The processing of Personal Data for the following purposes is based on legitimate interests:

5.3.1. to protect the interests of the Client and / or Company;

5.3.2. to provide evidence related to the conclusion and fulfillment of contractual obligations (records, documents submitted and other information);

5.3.3. to prevent, limit and investigate fraud or illegal use of the services and products of the Company;

5.3.4. to conduct business.

5.4. The processing of Personal data in order to provide information to government bodies and subjects of operational activities is carried out on the basis of fulfillment of the obligation defined by law, cases and to the extent established by external regulatory acts.

5.5. If the Company intends to continue the processing of Personal Data for another purpose that is not the purpose for which the Personal Data was received, then the Company, before such

further processing begins, informs the Client about the other purpose and provides them with all the relevant additional information in this regard.

6. Profiling and automated decision making

6.1. Profiling is an automated processing of Personal data, which manifests itself as the use of Personal data in order to evaluate the related personal aspects identified with the Client, in particular, to analyze or predict moments related to personal preferences, interests, behavior, location of the said Client.

6.2. The company carries out profiling in accordance with its legal interests, based on personal offers and marketing, as well as for assigning units of remuneration (bonuses) to the Client for participation in the marketing program.

The company provides customers with the ability to select and use convenient tools for managing their privacy settings.

6.3. The company can carry out automated decision-making for the client. The client must be informed about such activities of the Company separately in accordance with regulatory enactments.

6.4. Making automated decisions that create legal consequences for the Client can take place only during the conclusion or execution of an agreement between the Company and the Client or on the basis of the explicit consent of the Client.

7. Recipients of Personal Data

Personal data is transferred to other recipients, for example:

7.1. Institutions (e.g. law enforcement agencies, tax administrations, supervisory agencies and financial investigation institutions, etc.);

7.2. Auditors, legal and financial advisors or other personal data processors authorized by the Company;

7.3. Debt collectors in accordance with the assignment of claims, courts, extra-judicial institutions for the resolution of disputes, administrators of bankruptcy or insolvency;

7.4. Other persons associated with providing the Company's services (product suppliers, credit agencies and financial institutions, etc.).

8. Storage period

8.1. Personal data is processed no longer than necessary.

8.2. The retention period may be based on an agreement with the Client, the legal interests of the Company or applicable legal acts (for example, accounting laws, statutes of limitations, civil law, etc.).

8.3. Upon termination of the circumstances referred to in clause 8.2., The Customer's Personal Data is deleted.

9. The rights of the Client as a data subject and their implementation

The Client, as a Data Subject, in relation to the processing of his Personal Data, has the following rights to:

9.1. Require the correction of their Personal Data in case of their inconsistency, incompleteness or incorrectness;

9.2. Object to the processing of your Personal Data if the use of Personal Data is based on legal interests, including profiling for direct marketing purposes (for example, receiving marketing offers or participating in surveys);

9.3. Require to erase their Personal Data, for example, if Personal Data is processed on the basis of the Consent of the Client. This right does not apply if the Personal data that the Client requires to be erased is also processed on the basis of another legal justification, for example, an agreement or obligations arising from the relevant regulatory enactments;

9.4. Restrict the processing of their Personal Data in accordance with applicable regulations, for example, at the time when the Company evaluates whether the Client has the right to erase their data;

9.5. To receive information on whether the Company processes their Personal Data and, if it does, then to receive access to it;

9.6. Receive their Personal Data provided by themselves and processed on the basis of the Consent and fulfillment of the contract in writing or in any of the most commonly used electronic formats and, if it is technically possible, transfer this data to other service providers (data portability);

9.7. Withdraw their Consent to the processing of their Personal Data. Revocation of the Consent does not affect the processing of Personal Data performed at the time when the Consent of the Client was obtained. With the revocation of the Consent, the processing of Personal Data performed on other legal grounds cannot be interrupted;

9.8. Not to obey to fully automated decision-making, including profiling if such decision-making has legal consequences or significantly affects the Client. This right does not apply if a decision is necessary to conclude or execute an agreement with the Client, if a decision is allowed in accordance with applicable laws or if the Client gives their explicit consent;

9.9. Submit claims on the use of Personal Data to the supervisor in accordance with Article 77 of the GDPR if the Client considers that the processing of his Personal Data violates their rights and interests in accordance with applicable laws and regulations.

9.10. The Client may apply for the exercise of their rights in relation to the processing of Personal Data, including informing about possible violations of the Personal data protection:

9.10.1. by e-mail, indicating the customer's registration number and username for identifying the Customer, and sending to the email address dataprotection@innova.gold;

9.10.2. on the Company's website www.innova.gold in the created Customer's account.

9.11. Upon receiving the Client's request for the exercise of their rights, the Company verifies the identity of the Client, evaluates the request and fulfills it in accordance with regulatory enactments.

9.12. The Company responds to the Client's request in writing or in another way, including, if necessary, in electronic form (by e-mail or by sending it to the Client's account), as much as possible taking into account the method of receiving the response indicated by the Client. At the request of the Client, information may be provided verbally given that the identity of the Client is confirmed.

9.13. The Company provides information on actions taken at the request of the Client, without undue delay and in any case within one month from the receipt of the request. If necessary, this period may be extended for another two months, taking into account the complexity and number of requests. The Company shall inform the Client of any such extension within one month from the date of receipt of the request indicating the reasons for the delay.

9.14. If the Company does not take action at the request of the Client, the Company shall immediately and no later than within one month from the receipt of the request inform the Client about the reasons for not taking action and about the possibility of filing a complaint to the supervisor and the court.

10. Action and Change of Policy

10.1. The policy is available to Customers on the website: www.innova.gold.

10.2. The Company has the right to unilaterally change the Policy at any time in accordance with the applicable laws, by notifying the Client of the relevant changes on the Company's website, by e-mail or otherwise.