

GENERAL DATA PROTECTION REGULATION (GDPR) /PROCESSING OF PERSONAL DATA

Argus Management Ltd (hereinafter the “**Company**”), in order to comply with its regulatory obligations as it is required to do so by applicable law may have to process specific personal data of the Client (as natural person/corporate entities/funds) in relation to the provision of the Services to the Client to be offered by the Company as set out in any contractual agreement for the provision of the Services. As

The Company processes the Client’s personal information in accordance with the applicable legal and regulatory framework, including the law providing for the protection of natural persons with regard to the processing of personal data and for the free movement of such data, as amended, or repealed, or replaced from time to time, (Law 125(I)/2018) and the General Data Protection Regulation (EU) 2016/679, and ensures compliance with the applicable data privacy laws.

In summary are noted herein below the main aspects of the Processing of Personal Data Policy of the Company in relation to the provisions of Investment Services in Financial Instruments:

The Company has a legitimate interest in collecting and processing Personal Data for the purposes in order to administer, improve and generally conduct business, to prevent fraud and financial crime and to avoid non-compliance with the Company’s legal and regulatory obligations. Additionally, the Company processes and collects personal data due to legal obligations emanating from relevant laws to which it is subject and due to the performance of a contract.

In the course of the performance of our contractual and statutory obligations your personal data may be provided to various departments within the Company. Various service providers and suppliers may also receive your personal data so that we may perform our obligations. Such service providers and suppliers enter into contractual agreements with us by which they observe confidentiality and data protection according to the Cypriot legislation of data protection and GDPR. To this end, the Company does not share the client’s information with third parties if this is not required by the law. Personal data is processed in accordance with the rights of data subjects under the GDPR.

The Company is committed in safeguarding the privacy of the personal data and/or information the Client shares with the Company and/or with its employees and/or agents and/or associates. The Company applies procedures as for the personal data provided to the extent possible being processed confidentially and securely and will be used only for the purposes described in this document or for purposes arising from contractual relationship.



The Company, under applicable regulation has specific obligations to monitor and record all telephone communications between the Company and any other person acting for his account and the Company or its officers, employees or associates or agents, and it may use any mechanical or other means or equipment for such purpose when providing its Services.

Personal Data is held in both electronic and non-electronic form, mainly in technical systems, physical locations and archives as well as in software. As part of the legislation obligations, the Company is obliged to record the Client's telephone recordings and store with the Company for a minimum of ten (10) years or for as long as is necessary for the Company to comply with any legal and contractual obligations the Company may have. As part of the Anti-Money Laundering and Counter Financing obligations (see section below), the Company is obliged to keep Client identification and transaction data for at least 5 years after the end of the business relationship with the Client or from the conclusion of an occasional transaction with the Client.

Any consent given for marketing purposes can be withdrawn at any time by giving written notice to the Company.

For further information on Data Protection Policy applied by the Company you can read the Privacy Statement of the Company by visiting the website of the Company at www.argusmanager.com

For any requests or complaints you can contact the DPO of the Company at ctringides@argusmanager.com

