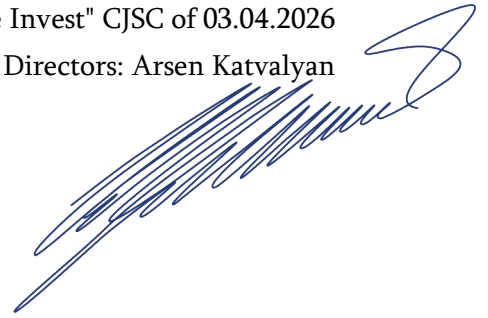


APPROVED BY

Decision No. 07 of the Board of Directors

of "Cube Invest" CJSC of 03.04.2026

Chairman of the Board of Directors: Arsen Katvalyan

A handwritten signature in blue ink, appearing to be 'Arsen Katvalyan', is written over the text of the approval.

PRIVACY POLICY

"CUBE INVEST" CJSC

2026

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1. GENERAL PROVISIONS

1. "Cube Invest" CJSC undertakes to protect, and not to breach, the confidentiality of any information concerning the personal data of the clients using the services of "Cube Invest" CJSC and of the representatives of partner organisations. This Privacy Policy describes the personal data protection policy of "Cube Invest" CJSC and the form and procedure for the processing of personal data.
2. This Privacy Policy applies to any service provided by "Cube Invest" CJSC, unless a regulation differing from this Privacy Policy has been established by "Cube Invest" CJSC.
3. From the moment of using the services of "Cube Invest" CJSC, clients and representatives of partner organisations unconditionally consent to the processing of their personal data in the manner established by this Privacy Policy, including to the making of enquiries for and the receipt of personal data. The confidentiality of the personal data of clients and of representatives of partner organisations is important to "Cube Invest" CJSC, and "Cube Invest" CJSC takes steps to prevent the unauthorised use or misuse by other persons of the data of clients and of representatives of partner organisations.
4. Should any questions arise in connection with this Privacy Policy or with the personal data confidentiality protection policy of "Cube Invest" CJSC, you may contact "Cube Invest" CJSC using the following contact details:
 - E-mail address: www.cubeinvest.am
 - Telephone: +374 11 800 810
 - Address: 10 Vazgen Sargsyan Street, Yerevan 0010, Republic of Armenia

2. DEFINITIONS AND TERMS

1. **Company** — "Cube Invest" CJSC.
2. **Privacy Policy** — this Privacy Policy on the processing of personal data.
3. **Website** — the official website of the Company: www.cubeinvest.am.
4. **Service** — any service provided by the Company.
5. **Client** — any person using the services of the Company, as well as representatives of partner organisations.
6. **Personal Data** — any information relating to a natural person which allows, or may allow, the identity of that person to be established directly or indirectly.
7. **Personal Data Processor** — "Cube Invest" CJSC.
8. **Processing of Personal Data** — any operation or set of operations, irrespective of the form and manner of its performance (including by automated means, with the application of any technical means or without such means), relating to the collection, recording, entry,

systematisation, organisation, storage, use, alteration, restoration, transfer, rectification, blocking or destruction of personal data, or to the performance of any other operations.

9. **Cookies** — small files which a website stores on the user's device in order to retain information, and which are used for the identification and personalisation of the user, and for analytical, advertising and other purposes.

3. LEGAL GROUNDS FOR THE PROCESSING OF PERSONAL DATA

1. The Client's Personal Data are processed on the basis of the legislation of the Republic of Armenia, including but not limited to:
 - 1) the Law of the Republic of Armenia "On Protection of Personal Data";
 - 2) the Law of the Republic of Armenia "On Combating Money Laundering and Terrorism Financing";
 - 3) the contracts and agreements concluded or to be concluded with the Client;
 - 4) the consent of the Client obtained as a result of accepting this Privacy Policy in another manner.
2. The data of legal entities are processed on the basis of the legislation of the Republic of Armenia, including, inter alia, the Law of the Republic of Armenia "On State Registration of Legal Entities, State Record-Registration of Separated Subdivisions of Legal Entities, Institutions and Individual Entrepreneurs".

4. PURPOSE OF THE PROCESSING OF PERSONAL DATA

1. Personal Data are processed for the following purposes:
 - 1) for the proper provision of the Services and the improvement of the quality of Client servicing;
 - 2) for the monitoring of the use of the Services;
 - 3) for establishing contact with the Client;
 - 4) for the opening of the Client's account, for the management and control of the Client's accounts and for the detection of instances of fraud;
 - 5) for the verification of the Client's identity (identification) (Clients are identified by the Company both in person and remotely; there are two methods of remote identification — through the Zoom platform and through an online platform by means of a biometric identification software application). The identification of the Client is carried out in the following sequence:
 - a) acceptance of the Client's application/request;
 - b) the Client submits the required Personal Data and the documents required for identification;

- c) preliminary verification of the documents;
 - d) the validity and completeness of the identity document submitted are verified;
 - e) selection of the method of identification (identification is carried out in person (by physical presence) or remotely (through Zoom or a biometric online platform));
 - f) verification of identity (in person — by comparing the document with the person; through Zoom — by identifying the person and the document during a video call; by biometric means — facial recognition, liveness check, scanning of the document);
 - g) validation of the data;
 - h) cross-checking of the data obtained against State registers or other reliable sources (where available);
 - i) risk assessment (KYC/AML);
 - j) screening of the Client against sanctions lists, PEP lists and other lists;
 - k) final approval or refusal (the Company takes a decision on whether to identify the Client and commence servicing, or to refuse to do so);
 - l) retention of the data (the data and the evidence relating to the identification process are retained in the manner established by law);
- 6) for ensuring the accuracy of the Client's Personal Data (verification, correction or updating);
 - 7) for improving the Client's activity on the Website, responding to the Client's enquiries and providing support;
 - 8) for compliance with the requirements of the legislative acts and other regulatory legal acts of the Republic of Armenia, in particular the requirements of Article 16 of the Law of the Republic of Armenia "On Combating Money Laundering and Terrorism Financing".

5. METHOD OF COLLECTION OF THE PERSONAL DATA PROCESSED AND LIST OF PERSONAL DATA SUBJECT TO PROCESSING

- 1. Information is collected from Clients in the following ways:
 - 1) when the Client uses the Services of the Company by any means, including on the premises of the Company or by electronic means;
 - 2) when you visit the official Website of the Company (for example, by subscribing or by completing the "Contact Us" form);
 - 3) when you register in, or download, the applications used by the Company;
 - 4) the Website of the Company may also use cookies.

2. In order to achieve the purposes set out in Section 4 of this Privacy Policy, such Personal Data may be requested from Clients who are natural persons, as well as in respect of the representatives of Clients that are legal entities, as passport details (the name, surname, citizenship and registered address (where available) of the person, the year, month, date and place of birth, the series and number of the identity document and the year, month and date of its issue, and, in the case of an individual entrepreneur, also the record-registration number and the taxpayer identification number), a self-portrait taken in real time (online selfie), the place of residence and the registered address, the e-mail address, the telephone number, the registration details with the relevant tax authority, the bank account number and the securities account number.
3. In the case of Clients that are legal entities, data may be requested in respect of the persons who are the beneficial owners, as well as in respect of the persons affiliated with such legal entities who may influence or predetermine the nature and scope of the activities of such persons.
4. The Company may also collect data such as information on the Client's financial standing (the relevant documents evidencing the sources of income (employment, rental), investments and credit obligations, as well as of inheritance or donation, are submitted), information on investment objectives, and information on the Client's knowledge and experience in the field of investment activity. The Company may also request from the State Revenue Committee of the Republic of Armenia monthly information on the Client's salary and the income equivalent thereto. The data provided for in this paragraph are deemed to be Personal Data to the extent that they allow a natural person to be identified.
5. Where necessary, the Company may also request other Personal Data.
6. The information provided must be accurate, up to date and reliable, and the Client bears responsibility for ensuring this. The Client's Personal Data shall be processed in the minimum volume necessary to achieve the purposes set out in this Privacy Policy.
7. The Client agrees that the Company may transfer the Client's Personal Data and other information relating to the Client to third parties, including to partner companies, for the purpose and within the scope of executing the Client's instructions/transactions, as well as for other lawful purposes arising from the ordinary course of the Company's business.

6. OPERATIONS CARRIED OUT FOR THE PURPOSE OF PROCESSING PERSONAL DATA

1. The processing of Personal Data is any operation or set of operations, irrespective of the form and manner of its performance (including by automated means, with the application of any technical means or without such means), relating to the collection, recording, entry, systematisation, organisation, storage, use, alteration, restoration, transfer, rectification, blocking or destruction of Personal Data, or to the performance of any other operations.

2. In the course of processing Personal Data, the Company is guided by the following requirements:
 - 1) the lawfulness of the purposes and of the means of processing the data, and the reliability of the data;
 - 2) ensuring the lawfulness of the processing of Personal Data, which presupposes the processing of data with the consent of the data subject;
 - 3) conformity between the actual and the declared purposes of the processing of Personal Data;
 - 4) conformity between the volume and nature of the Personal Data and the means and purposes of processing;
 - 5) the processing of Personal Data in the minimum volume necessary to achieve the lawful purposes;
 - 6) continuous internal control over the processing of Personal Data, and readiness to undergo State inspections of the processes and systems for the processing of Personal Data.

7. RIGHTS OF THE CLIENT

1. The Client has the rights established by Chapter 4 of the Law of the Republic of Armenia "On Protection of Personal Data".
2. The Client has the right to withdraw the Client's consent to the processing of Personal Data, or to request the deletion of the Client's Personal Data, taking into account that in such case the Company may be deprived of the possibility of providing Services to the Client or of performing certain actions within the scope of the provision of the Services, and may terminate the contract concluded with the Client.
3. The Client has the right to apply to the Company for the rectification or amendment of the Client's Personal Data where they are incorrect or need to be updated.
4. The Client has the right to submit a complaint/claim to the Company if the Client considers that the Client's Personal Data have been processed in breach of the applicable requirements, or if the Client does not agree with the procedure for the processing of the Client's Personal Data.

8. RETENTION PERIODS FOR PERSONAL DATA

1. The Company periodically reviews the retention periods for Personal Data in accordance with the requirements of the legislation in force in the Republic of Armenia and the policy adopted by the Company.

2. The retention period for Personal Data may not be longer than the period necessary to achieve the purposes determined in advance, unless otherwise established by the legislation of the Republic of Armenia.
3. The Client's Personal Data shall be retained for the duration established by the procedures of the Company and by the legislation of the Republic of Armenia.
4. The Company processes only such Personal Data as are subject to retention under the legislation of the Republic of Armenia, and such Personal Data as are necessary to achieve the purposes set out in this Privacy Policy, avoiding to the greatest extent possible the duplicate processing thereof.

9. SECURITY MEASURES IN PLACE

1. In order to ensure the protection of the Personal Data processed, the Company takes the necessary legal, organisational and technical protective measures in accordance with the legislation of the Republic of Armenia and the requirements of the Company's information security policy, and in line with the technical capabilities of the Company.
2. The Client's Personal Data are accessible to the employees of the Company only to the extent and for the periods necessary for the achievement of the purposes set out in this Privacy Policy. The employees of the Company and other persons who have been granted the right to access the Personal Data processed have signed an undertaking of non-disclosure of confidential information, and have been warned of the potential disciplinary, administrative, civil and criminal liability arising in the event of a breach of the norms and requirements of the legislation in force in the Republic of Armenia in the field of the processing of Personal Data.

10. ENTRY INTO FORCE AND TERM OF THE PRIVACY POLICY

1. This Privacy Policy, as well as all amendments thereto, shall be approved by the Board of Directors of the Company and shall enter into force on 06.04.2026.
2. Amendments and/or supplements to this Privacy Policy may be made only by the Board of Directors of the Company, upon the proposal of the General Director of the Company or pursuant to a requirement of the legislation in force in the Republic of Armenia.
3. The consent to the processing of Personal Data given by the acceptance of this Privacy Policy shall remain in force until the termination of all legal relations existing between the Company and the Client and the full performance of the Client's obligations towards the Company.

This document is an English translation of the Armenian original. In the event of any discrepancy between the Armenian and English versions, the Armenian version shall prevail.