Adventum International Limited

Data Privacy Policy

27th October 2026

Revisions Log

Version	Date Issued	Details
1.0	20th August 2024	First Draft
1.1	5th November 2024	Periodic Review
1.2	27th October 2026	Periodic Review

Table of Contents

1. Purpose 4
2. Scope 4
3. General 4
4. Data Collection and Use 5
5. Subject to the Consent and the Rights of Data Subjects 5
   - 5.1 Compliance with Laws 6
   - 5.2 Communications 6
   - 5.3 Log Data 6
   - 5.4 Cookies 6
   - 5.5 Service Providers 7
6. Storage of Personal Data 7
7. Data Minimisation 7
8. Data Processing 7
9. International Transfer 9
10. Notification of Breach 9
11. Rights of Data Subjects 10
    - 11.1 Right to Information 10
    - 11.2 Right of Access 10
    - 11.3 Right to Rectification and Erasure 10
    - 11.4 Right to Restrict Processing 11
    - 11.5 Right to Data Portability 12
12. Links to Other Sites 12
13. Fees 12
14. Changes to this Data Privacy Policy 13
15. Review 13

1. Purpose

This Data Privacy Policy (the "**Policy**") outlines the rights and obligations and other essential provisions relating to the collection, processing, handling and storing of personal data. "**Personal Data"** shall refer to any collected information relating to an identified or identifiable natural person ("**Data Subject**", "**your**", "**you**") by Adventum International Limited, a Company incorporated under the Laws of Malta on the 5th of October 2018, with Company registration number C 88511 and having its registered office at 23, Triq in-Nofs in-Nhar, Valletta, VLT 1102, Malta and the Alternative Investment Funds ("the **AIFs**") managed by the Company, (collectively referred to as the "**Company**").

The Company ensures that all the collection, processing, handling and storing of Personal Data in relation to the Company's, relationship with its clients, shall be carried out in harmony with the directly applicable Regulation EU 2016/679 of the European Parliament and of the Council of 27th April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("**GDPR**").

2. Scope

This policy applies to all related undertakings and employees of the Company, and to third parties who conduct processing of Personal Data through the Company.

The Company is authorised by the Malta Financial Services Authority ("**MFSA**") in terms of the Investment Services Act, Chapter 370 of the Laws of Malta as a Alternative Investment Fund Manager.

The Company operates the website adventum.eu and is the Data Controller for the website. The Company is committed to protect the privacy of individuals who visit the website and who make use of its services.

3. General

The Company will not use or share the Personal Data and information provided with anyone except as described in this policy.

Contact details of the Data Protection Officer of the Company:
Name: Mr. Gabor Nemeth
Company Address: 23, South Street, Valletta 1102, Malta
E-mail address: gabor.nemeth@adventum.eu
Phone number: +356 99316941

The Company will use your Personal Data for providing and improving its services. By using the Company's services and the website, you agree to the collection and use of data in accordance with this Policy.

4. Data Collection and Use

The Company is committed to collecting, processing, handling, and storing Personal Data in accordance with the principles laid down in the GDPR. In this regard, such Personal Data will be:

1. Processed lawfully, fairly, and in a transparent manner;
2. Collected for specified, explicit, and legitimate purposes;
3. Not further processed in a manner that is incompatible with those purposes, unless it is for archiving purposes in the public interest;
4. Not kept longer than necessary for the achievement of those purposes, unless for the public interest;
5. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;
6. Accurate and kept up to date, and we will take every reasonable step to ensure that any inaccurate Personal Data is erased or rectified without delay; and
7. Processed in a manner that ensures appropriate security and confidentiality.

5. Subject to the Consent and the Rights of Data Subjects

The collection, processing, handling, and storing of Personal Data will always be subject to the consent and all the rights such Data Subject is entitled to, as outlined in subsequent sections, including the necessary minimum information which must be communicated to the Data Subject. The Data Subject may at all times, subject to certain exemptions, withdraw their consent or request the erasure or rectification of their Personal Data. In such cases, we shall irrevocably destroy or rectify such Personal Data.

The Company will collect, process, handle or store your Personal Data only if:

1. You have given consent to the processing of your personal data for one or more specific purposes;
2. It is necessary for the performance of a contract or prior to the entering into a contract to which the you are a party;
3. It is necessary for our compliance with a legal obligation;
4. It is necessary in order to protect your vital interests or the vital interests of another natural person;
5. It is necessary for the performance of a task carried out in the public interest; and
6. It is necessary for the purposes of the Company's legitimate interests, except where such interests are overridden by your interests or your fundamental rights and freedoms which require protection of your Personal Data.

5.1 Compliance with Laws

The Company and its AIFs may collect and process a Data Subject's Personal Data to comply with any law or regulation, or to satisfy a legal or statutory obligation. Such Personal Data will only be

disclosed with any employee of the Company or any other person as required by law or by court order or if the Company believes that such action is necessary to comply with legal obligations, respond to legitimate requests from law enforcement or to protect the security and integrity of the Company and its AIFs services. The Personal Data which the Company may process in this regard includes, but is not limited to, the Data Subject's name, address, identification number, date of birth, country of birth, email address, and phone number.

5.2 Communications

The Company may use a Data Subject's Personal Data to send newsletters, marketing or promotional materials, and other information that may be of interest to the Data Subject. The Data Subject may opt out of receiving any, or all, of these communications by following the unsubscribe link or instructions provided in any email sent by the Company.

5.3 Log Data

When visiting the Company's website, any information sent by the Data Subject's browser is collected ("**Log Data**"). This Log Data may include information such as the Internet Protocol ("**IP**") address of the Data Subject's computer, browser type, browser version, the pages of the Company's website that the Data Subject visits, the time and date of the visit, the time spent on those pages, and other statistics.

In addition, the Company may use third party services such as Google Analytics to collect, monitor and analyse this type of information to increase the functionality of its website. These third-party service providers have their own privacy policies addressing how they use such information. The Data Subject can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page. Google also recommends installing the Google Analytics Opt-out Browser Add-on for the Data Subject's web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page.

5.4 Cookies

Cookies are files containing a small amount of data which may include an anonymous unique identifier. These Cookies are sent to your browser from a website and stored on the hard drive of the Data Subject's computer.

The Company and its AIFs use cookies to collect information. The Data Subject can instruct their browser to refuse all cookies or to indicate when a cookie is being sent. However, if the Data Subject does not accept cookies, they may not be able to use some portions of the Company's website.

5.5 Service Providers

The Company may engage third party companies and individuals to facilitate its services, to provide services on its behalf, to perform related services, or to assist in analysing how its services are used.

These third parties have access to the Data Subject's Personal Data only to perform these tasks on the Company's behalf and are obliged not to disclose or use it for any other purpose.

6. Storage of Personal Data

The Company is committed to store your Personal Data in the most secure manner using effective and modern software which shall be kept up-to-date. The storage of such Personal Data shall be made in accordance with the principles and procedures applicable to the processing of Personal Data, laid down in the previous section of this Policy. This Policy requires that such Personal Data is kept confidential by restricting access to only the Data Subject or to persons who actually require such access for legitimate reasons and with the appropriate security measures in place to avoid unauthorised access or sharing of Personal Data. The Company will implement all necessary procedures to ensure that any erasure of Personal Data is done safely and securely with no possibility of recovery of such data. The Company shall also implement back-up and disaster recovery solutions to protect against accidental data loss.

The security of Personal Data is important to the Company but remember that no method of transmission over the Internet or method of electronic storage is completely secure. While the Company and its AIFs strive to use commercially acceptable means to protect your Personal Data, the Company cannot guarantee its absolute security.

7. Data Minimisation

The Company is committed to process and store Personal Data only as long as such storage is required and for legitimate purposes. Therefore, this Policy requires the erasure, within reasonable time, of a Data Subject's Personal Data which is no longer required or the purpose for which data was stored is no longer relevant.

8. Data Processing

The Company collects Personal Data when the Data Subject:

1. Accesses the Company's website;
2. Posts a query or complaint through the Company's website;
3. Requests the services of the Company;
4. Applies for an opportunity with the Company; and
5. Engages the Company to provide its services.

9. International Transfer

The Data Subject's Personal Data may be transferred to, and stored on, computers located outside of their own country, where data protection laws may differ from those in their jurisdiction.

If a Data Subject is located outside Malta and chooses to provide the Company and its AIFs with certain information, please note that the Company may transfer the information, including Personal Data, to Malta and process it there.

By consenting to this Data Privacy Policy and subsequently submitting such information, the Data Subject agrees to this transfer.

10. Notification of Breach

In the case that the security or confidentiality of the Data Subject's Personal Data is breached, the Company will notify the competent supervisory authorities within 72 hours of becoming aware of such breach, and shall also inform the Data Subject without undue delay of such breach if deemed that such breach poses a high risk to the rights and freedoms of the Data Subject. In notifying the Data Subject of such breach, the Company shall communicate in plain language:

1. The name and contact details of the Data Protection Officer or other contact point where more information can be obtained;
2. The likely consequences of the breach;
3. The measures taken or proposed to be taken to address and mitigate the effects of the breach.

11. Rights of Data Subjects

The Company is committed, to the best of its abilities, to allow the Data Subject to exercise their rights in relation to their Personal Data held by the Company and its AIFs The Company and its AIFs are committed to respect and act upon any exercise of such rights.

11.1 Right to Information

The Data Subject is entitled to certain minimum information when their Personal Data is collected. This Data Privacy Policy provides the Data Subject with such information, which includes the following:

1. The Company's identity and contact details, including its AIFs, or those of the Company's representatives;
2. The contact details of the Data Protection Officer;
3. The purposes and legal basis of the processing of the Data Subject's Personal Data;
4. The legitimate interests pursued by the Data Subject for the processing of their Personal Data;
5. The recipients of the Data Subject's Personal Data;
6. If a Data Subject's Personal Data is not collected directly from them, information as to the source of their Personal Data; and
7. The fact that the Company may transfer a Data Subject's Personal Data to a third country or international organisation and that appropriate safeguards are in place.

This Data Privacy Policy is also providing you, as the Data Subject with the following information:

1. The period for which your Personal Data will be stored, or the criteria used to determine that period;
2. Information on the rights concerning your personal data to which you are entitled;
3. The fact that providing your Personal Data is both a legal and contractual requirement, including when you are or are not obliged to provide your data, and the possible consequences of not doing so; and
4. The existence of automated decision-making, including profiling, and information on the logic involved, and the significance and the envisaged consequences of such processing of your Personal Data.

11.2 Right of Access

This Policy requires the Company to allow the Data Subject to exercise his/her right in requesting a confirmation from the Company as to whether his/her Personal Data is being processed and the right to access his/her Personal Data. The Data Subject is also entitled to access the information on his/her Personal Data as outlined in the previous sub-section.

11.3Right to Rectification and Erasure

The Data Subject shall have the right to obtain from the Company without undue delay the rectification of any inaccurate Personal Data concerning him/her. Taking into account the purposes of the processing, the Data Subject shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

The Data Subject may request the Company to delete any of his/her Personal Data. When such request is made, the Company is obliged to destroy his/her Personal Data in an irrecoverable manner and without undue delay if one of the following grounds applies:

1. The Data Subject's Personal Data is no longer necessary for the purposes for which it was collected or processed;
2. The Data Subject withdraws their consent on which the processing is based and where there is no other legal ground for the processing;
3. The Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
4. The Data Subject's Personal Data has been unlawfully processed;
5. The Data Subject's Personal Data has to be erased for compliance with a legal obligation in the EU or under Maltese Law; and
6. The Data Subject's Personal Data has been collected in relation to the offer of information society services.

This right to erase your Personal Data shall not be granted if the processing of your Personal Data is necessary for:

1. Exercising the right to freedom of expression and information;
2. Compliance with a legal obligation which requires processing by the EU or Malta, or for the performance of a task carried out in the public interest;

3. Reasons of public interest in the area of public health;
4. Archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes as long as erasure of your Personal Data is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
5. The establishment, exercise or defence of legal claims.

11.4 Right to Restrict Processing

This Policy also commits the Company to allow you, as the Data Subject, to exercise your right to restrict the Company from processing your Personal Data when one of the following applies:

1. You contest the accuracy of your Personal Data, for a period of time enabling us to verify the accuracy of your Personal Data;
2. The processing is unlawful, and instead of requesting the erasure of your Personal Data, you request the restriction of its use instead;
3. The Company no longer needs your Personal Data for the purposes of processing, but your Personal Data is required by you for the establishment, exercise, or defence of legal claims;
4. You have objected to the processing of your Personal Data, and the restriction applied while we verify whether our legitimate grounds override your fundamental rights and freedoms.

When processing is restricted, your Personal Data shall, with the exception of storage, only be processed:

1. With your consent;
2. For the establishment, exercise, or defence of legal claims;
3. For the protection of the rights of another natural or legal person; or
4. For reasons of important public interest of the EU or one of its member states.

Apart from restricting processing, you shall also have the right to object, at any time, to the processing of your Personal Data when it is required for the performance of a task carried out in the public interest or for the purposes of our legitimate interest. In such case, the Company may continue to process your Personal Data only if it demonstrate compelling legitimate grounds for such processing, which override your interests, rights and freedoms, or for the establishment, exercise or defence of legal claims. If you object to the processing of your Personal Data for direct marketing purposes, the Company shall cease the processing.

11.5 Right to Data Portability

The Data Subject may also request to receive his/her Personal Data from the Company in a structured, commonly used and machine-readable format. The Data Subject may also request such Personal Data to be transmitted to another controller without any hindrance from the Company where:

1. The processing is based on a consent or on a contract; and
2. The processing is carried out by automated means.

12. Links to Other Sites

The Company's website may contain links to other sites that are not operated by it. If you click on a third-party link, you will be directed to the site of that third party. When connecting to such other websites you will no longer be subject to this Policy but to the privacy policy of the new site. The Company therefore strongly advises you to review the privacy policy of every site you visit.

The Company has no control over, and assume no responsibility for, the content, privacy policies, or practices of any third-party sites or services.

13. Fees

The Company will in general not charge for any reasonable requests to exercise your individual rights as mentioned in this Policy. However, the Company may charge a reasonable fee taking into account administrative costs, if your request to exercise your individual rights is manifestly unfounded or excessive. Alternatively, the Company may refuse to comply with the request in such circumstances.

14. Changes to this Data Privacy Policy

The Company may update this Policy from time to time and any changes made to this Policy will be posted on this page. The Company therefore advises all Data Subject's to review this Policy periodically to remain informed of any updates. Changes to this Policy are effective when they are posted on this page.

15. Review

This Outsourcing Policy will be reviewed regularly, at least annually or whenever the result of an internal audit suggests that the policy should be reviewed.