



PRIVACY POLICY

CONFIDENTIALITY AND DATA PROTECTION

Nova Partners Limited ("Nova Partners" or the "Company"), will treat all information about you as private and confidential. We will not disclose any information relating to you to others except:

- (a) to the extent required by any applicable laws or regulations;
- (b) where there is a duty to the public to disclose;
- (c) where Nova Partner's interests require disclosure, or
- (d) at your request or with your consent.

Consent to Transfer of Data

All personal information about you that we acquire may be stored (by electronic and other means) and used by us in the following ways:

- to enable us to provide services to you;
- to respond to requests for information from you;
- to follow up with you after you request information to see if we can provide any further assistance
- for statistical purposes and for market and product analysis;
- to develop and improve the products and services we provide and/or may provide to you and/or to your organisation;
- for our own administrative purposes (including, but not only, maintaining our records) and compliance purposes;
- for crime prevention and detection;
- to prevent or detect abuse of our services or any of our rights and to enforce or apply our terms and conditions and/or other agreements or to protect our (or others') property or rights;
- to contact you (for example, by telephone, fax, e-mail or other means) to let you know about products or services that we think may be of interest to you.

To other organisations we may engage to perform, or assist in the performance of our services, or to advise us, provided that they will only be given access to your personal information to perform such assistance services or advice and not for other purposes.

We shall endeavor to ensure that any such organisation undertakes to adopt appropriate security measures in respect of yours and others' personal data.

Transfer of Data Abroad

Data may be transferred to, and stored and processed in, other countries including countries, which do not offer "adequate protection" for any purpose related to the operation of your account. Such purposes include but are not limited to processing of instructions and generation of confirmations, the operation of control systems; the operation of management information systems and allowing staff of Affiliates who share responsibility for managing your relationship from other offices to view information about you.

Before doing so, we will put contractual arrangements in place to ensure the adequate protection of your information and we shall endeavor to ensure that any such contractual arrangements comply with widely accepted "business best practice" standards related to the protection of individual and corporate privacy and confidentiality.

We have security procedures covering the storage and disclosure of your personal information to prevent unauthorized access and to comply with our legal obligations.

You are entitled to ask us for details of the personal information that we hold about you, the purposes for which they are being or are to be processed, and the recipients or classes of recipients to whom they are or may be disclosed. If you would like to request this information, please contact us. We may charge a fee for providing this information to you (details of which are available upon request). If you make a written request to us, we will also correct, delete and/or block personal information from further processing if that information proves to be inaccurate.

Data may also become subject to the legal disclosure requirements of other countries. Provision of any data related to such legal requirements, shall be strictly limited to the data mandated to be disclosed by law and no other information shall be disclosed voluntarily.