

PRIVACY POLICY AND PERSONAL DATA PROTECTION STATEMENT

Version 1 as of December 02, 2025

1. General terms

1.1. This Privacy Policy and Personal Data Protection Statement (**hereinafter referred to as the "Policy"**) regulates collection, processing, protection, and other actions with personal data of Users of the website <https://palmina-invest.com> (**hereinafter referred to as the "Website"**) by the personal data operator (**hereinafter referred to as the "Operator"**) within the scope of services provided by the Operator.

The following terms and definitions are used in this Policy and in the relations between the Parties arising from or related to it:

- a) User** — any legally capable individual visiting the Website for their own interest or on behalf of others.
- b) Website** — the websites under the domain <https://palmina-invest.com> and its subdomains.
- c) Service** — a set of services provided to the User through the use of the Website.
- d) Data Subject** — is the User of the Website (an individual) to whom the personal data belongs and who can be identified by such data.
- e) Policy** — this Privacy Policy and Personal Data Protection Statement, including all addendums and amendments.

1.2. The Operator complies with the applicable laws.

2. Purpose of Personal Data Processing

2.1. Personal data of a User is processed for:

- handling User requests, registration, and providing access to the Website functions;
- marketing, advertising, informational communications (if provided for by the agreement with the User);
- improving the quality of service, the provision of services, and the operation of the Website;
- statistical analysis to enhance user experience;
- fulfilling obligations to Users including technical support.

3. Personal Data Processed

3.1. The Operator processes the following personal data, either jointly or separately:

- name and surname;
- company;
- email address;
- phone number;
- information provided by the User via Website forms (e.g., orders, comments, feedback);
- other data that may be collected and provided by the User during the use of the Website.

3.2. The data being processed may be either personal or anonymized, including data for analysis and statistical purposes.

4. Consent of the data subject

4.1. The Operator processes the personal data of Users (Data Subjects) only with their explicit consent. Consent to the processing of personal data is provided by the User during registration on the Website or at the moment of submitting data through feedback forms.

4.2. The User may withdraw their consent to the processing of personal data at any time by sending a corresponding notice to the email address front.office@palmina-invest.com. Upon withdrawal of consent, the data processing will be terminated within five (5) business days from the date the Operator receives the notice, except in cases where the processing is necessary to fulfill obligations to the User.

5. Rights of Data Subjects

5.1. The Data Subject has the right to:

- request information from the Operator regarding the processing of their personal data;
- request clarification, blocking, or deletion/destruction of their personal data, including cases where the data is incomplete, outdated, or processed in violation of the law;
- access their personal data processed by the Operator and request their deletion or correction.

5.2. To exercise these rights, the User may contact the Operator at the email address front.office@palmina-invest.com

6. Operator's Obligations

6.1. The Operator shall:

- ensure the security of Users' personal data and protect it from unauthorized access, loss, or alteration;

- process personal data only for the purposes for which it was collected, and not use it for other purposes without the User's consent;

- not disclose data to third parties without the User's consent except as required by applicable legislation.

6.2. In the event of a personal data breach, the Operator undertakes to notify the Data Subject as soon as possible.

7. Personal Data Retention Periods

7.1. The User's personal data is retained for the period necessary to achieve the purposes of processing, but no longer than permitted by the applicable legislation.

7.2. Data is anonymized or destroyed after purpose achieved.

8. Data Transfer to Third Parties

8.1. The Operator has the right to transfer personal data to third parties in the following cases:

- in case the data transfer is necessary for the fulfillment of obligations to the User, for example, for the performance of a contract concluded with the User;
- in case required by law or upon request of government authorities.

8.2. The Operator takes all necessary measures to ensure the security of the data when transferring it to third parties.

9. Personal Data Protection

9.1. The Operator takes all necessary measures to ensure the security of Users' personal data, including technical and organizational measures to protect the data from breaches, unauthorized access, alteration, or destruction.

10. Changes to the Policy

10.1. The Operator reserves the right to make changes to this Policy at any time. The updated version will be published on the page containing this document.

11. Contact Information

Any questions related to the processing of personal data, Users may address to the following email address: front.office@palmina-invest.com