

Approved  
by the decision No. 2024/21 of the General  
Meeting of "CUBE INVEST" CJSC  
dated 18 November, 2024  
Chairman of the Meeting: Armen Ter-Hakobyan



**PRIVACY POLICY OF  
“CUBE INVEST” CJSC**

***By using our services, You unconditionally consent to the processing of Your personal data as defined by this Privacy Policy, including the request and receipt of personal data. The confidentiality of Your personal data is important to us, and we take steps to prevent unauthorized access to or misuse of Your data by third parties.***

## 1. Definitions

- 1.1. **Company** – “Cube Invest” CJSC (address: 1 Amiryan st., Yerevan)
- 1.2. **Privacy Policy** – this Privacy Policy governing the processing of personal data.
- 1.3. **Website** – the official website of the Company: [www.cubeinvest.am](http://www.cubeinvest.am).
- 1.4. **Client** – any individual using the Company’s services.
- 1.5. **Personal Data** – any information relating to an individual that enables or may enable, directly or indirectly, the identification of that individual.
- 1.6. **Personal Data Processor** – “Cube Invest” CJSC.
- 1.7. **Personal Data Processing** – any operation or set of operations, regardless of the form and method of implementation (including automated, with or without the use of any technical means), which is related to the collection or recording or input or systematization or organization or storage or use or alteration or recovery or transfer or correction or blocking or destruction or other actions on personal data.
- 1.8. **Cookies** – small files, which keep the website stored on a user’s device to retain information and are used for user identification, personalization, analytics, advertising, and other purposes.

## 2. Introduction

- 2.1. The Company (hereinafter also referred to as "we," "us," "our") is committed to protecting the confidentiality of any personal data belonging to the Company’s clients, representatives of partner organizations (hereinafter also referred to as "You," "Your"). This Privacy Policy outlines the Company’s approach to personal data protection, as well as the methods and procedures for processing personal data.
- 2.2. This Privacy Policy applies to all services provided by the Company (hereinafter referred to as "Services"), unless otherwise specified in writing by the Company.

## 3. Legal Grounds for Personal Data Processing

- 3.1. Your personal data is processed based on the legislation of the Republic of Armenia, including but not limited to:
  - 3.1.1. The Law of the Republic of Armenia "On Protection of Personal Data”;

**3.1.2.** The Law of the Republic of Armenia "On Combating Money Laundering and Terrorism Financing";

**3.1.3.** Contracts and agreements executed or to be executed with You;

**3.1.4.** Your consent obtained through alternative acceptance of this Privacy Policy.

**3.2.** The data of legal entities is processed based on the legislation of the Republic of Armenia, including, but not limited to, the Law of the Republic of Armenia "On State Registration of Legal Entities, Separated subdivisions of Legal Entities, Institutions, and Individual Entrepreneurs."

#### **4. Purpose of Personal Data Processing**

**4.1.** Personal data is processed for the following purposes:

**4.1.1.** To provide Services properly and improve the quality of client service;

**4.1.2.** To monitor the use of Services;

**4.1.3.** To contact You;

**4.1.4.** To open Your accounts, manage and monitor Your accounts, and for detection of fraud;

**4.1.5.** To verify (identify) Your identity;

**4.1.6.** To ensure the accuracy of Your personal data (verification, correction, or updates);

**4.1.7.** To improve Your interactions on the Website, respond to Your inquiries, and provide support;

**4.1.8.** To comply with the requirements of the laws and regulations 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."

#### **5. Methods of Collecting and Types of Personal Data Processed**

**5.1.** Information about You is collected through the following methods:

**5.1.1.** When You use our Services in any way, including in the Company's premises or electronically;

**5.1.2.** When You visit our official Website (e.g., by subscribing or completing the "Contact Us" form);

**5.1.3.** When You register in or download applications used by the Company;

**5.1.4.** The Company's website may also use cookies.

**5.2.** To achieve the purposes outlined in Section 4 of this Privacy Policy, personal data such as passport details, real-time selfie (online selfie), place of residence and registration,

e-mail address, telephone number, registration data with the relevant tax authority, bank account number, securities account number, data on affiliated persons, etc. may be requested from individual clients, as well as representatives of legal entity clients.

**5.3.** The Company may also collect information about Your financial situation (e.g., sources and amounts of income), investment objectives, and Your knowledge and experience in the field of investment activities. The data specified in this section is considered personal data to the extent that it allows the identification of an individual.

**5.4.** If necessary, the Company may also request additional personal data.

**5.5.** The information provided must be accurate, up-to-date, and reliable, and You are responsible for ensuring its accuracy. Your personal data will be processed in the minimum amount necessary to achieve the purposes defined in this Privacy Policy.

**5.6.** If You provide the Company with personal data of third parties, we will assume that You have obtained their consent for us to process their data. Otherwise, You are fully responsible for any consequences of not obtaining such consent and must indemnify the Company for any damages incurred as a result.

**5.7.** You agree that we may transfer Your personal data and other related information to third parties, including partner companies, for the purpose of and within the framework of fulfilling Your orders/transactions, as well as for other legitimate purposes arising from the Company’s regular operations.

## **6. Actions Performed for the Purpose of Processing Personal Data**

**6.1.** Personal data processing means any operation or set of operations, regardless of the method or means (including automated and technical tools or without them), which is related to the collection or recording or input or systematization or organization or storage or use or alteration or recovery or transfer or correction or blocking or destruction or other actions on personal data.

**6.2.** In the course of processing personal data, the Company adheres to the following principles:

**6.2.1.** Legality of purposes, data processing methods, and the reliability of data;

**6.2.2.** Ensuring the lawfulness of data processing, which implies processing data with the consent of the subject;

**6.2.3.** Alignment of data processing with real and declared purposes;

**6.2.4.** Proportionality between the volume and nature of personal data, processing methods, and purposes;

**6.2.5.** Processing personal data in the minimum quantity necessary to achieve lawful purposes;

**6.2.6.** Maintaining continuous internal control over data processing and readiness for state inspections of personal data processing procedures and systems.

## **7. Your Rights**

**7.1.** You have the rights provided under Chapter 4 of the Law of the Republic of Armenia “On Protection of Personal Data.”

**7.2.** You have the right to withdraw Your consent for processing Your personal data or request the deletion of Your personal data, taking into account that in this case the Company may be deprived of the opportunity to provide You with services or perform certain actions within the framework of providing services and, may terminate the agreement concluded with You.

**7.3.** You have the right to contact the Company to correct or update Your personal data if it is inaccurate or outdated.

**7.4.** You have the right to submit a complaint or claim to the Company if You believe Your personal data has been processed in violation of applicable laws or if You disagree with the method of processing Your personal data.

## **8. Personal Data Retention Periods**

**8.1.** We periodically review personal data retention periods in accordance with the requirements of the applicable laws of the Republic of Armenia and the policies adopted by the Company.

**8.2.** The personal data retention period cannot exceed the duration necessary to achieve the pre-determined purposes unless otherwise required by the laws of the Republic of Armenia.

**8.3.** Your personal data will be retained in compliance with the Company’s procedures and for the duration specified by the laws of the Republic of Armenia.

**8.4.** The Company processes only the personal data subject to retention as defined by the legislation of the Republic of Armenia and personal data necessary to achieve the purposes outlined in this Privacy Policy, avoiding duplicate processing to the greatest extent possible.

## **9. Measures for Ensuring Security**

**9.1.** To ensure the protection of personal data being processed, the Company takes the necessary legal, organizational, and technical protection measures in accordance with the requirements of the RA legislation, the Company's information security policy, and the Company's technical capabilities.

**9.2.** Access to Your personal data is granted to our employees only to the extent and for the duration necessary to fulfill the purposes outlined in this Privacy Policy. Employees and any other persons granted access to the processed personal data have signed non-disclosure agreements and have been informed about possible disciplinary, administrative, civil and criminal liability in case of violation of the norms and requirements of the current legislation of the Republic of Armenia in the field of personal data processing.

## **10. Effective Date and Term of the Privacy Policy**

**10.1.** This Privacy Policy, as well as any amendments to it, is approved by the Company's general meeting and comes into effect from the moment of publication on the Company's Website.

**10.2.** The consent to the processing of personal data upon acceptance of this Privacy Policy remains valid until the termination of all legal relations between the Company and You and the full fulfillment of Your obligations to the Company.

If You have any questions regarding this Privacy Policy or our personal data protection practices, You may contact us using the following contact methods:

Email: [www.cubeinvest.am](http://www.cubeinvest.am)

Tel: +374 11 800 810

Address: RA, Yerevan, 0010, Amiryan 1