

## PRIVACY STATEMENT

We know just how important your privacy is to you. So, we have made privacy a priority in every aspect of our online operations.

This privacy statement sets out the privacy practices and policy of the Catalyst Investors' club Ltd (the "CIC") online investment platform for services, procedures and information provided by the CIC website at [catalyst-ic.com](http://catalyst-ic.com) (the "Website").

By registering for our website or by using this Website or services made available through the Website, you agree to this privacy policy. If you do not agree to be bound by this Policy as described in this Privacy Statement, you should cease all use of the Site and refrain from submitting any Personal Data.

### 1. Definitions and key terms

To help explain things as clearly as possible in this Privacy Policy, every time any of these terms are referenced, are strictly defined as:

**Cookie:** small amount of data generated by a website and saved by your web browser. It is used to identify your browser, provide analytics, remember information about you such as your language preference or login information.

**Catalyst Investors' club Ltd:** when this policy mentions "CIC," "we," "us," or "our," it refers to CATALYST INVESTORS' CLUB LTD that is responsible for your information under this Privacy Policy.

**Device:** any internet connected device such as a phone, tablet, computer, or any other device that can be used to visit CIC and use the services.

**"Personal Data" or "Personal Information"** means any information that can be used, alone or together with other data, to uniquely identify any living human being and any information deemed as Personally Identifiable Information by privacy laws. Please note that this is a master privacy policy and some of its provisions only apply to individuals in certain jurisdictions. For example, the legal basis in the table below is only relevant to GDPR-protected individuals.

**Third-party service:** refers to advertisers, contest sponsors, promotional and marketing partners, and others who provide our content or whose products or services we think may interest you.

We may use non-personally identifying information in the aggregate that we collect to provide statistical information about users of the Site (i.e., on an anonymous basis), to improve the quality, design, and content of our Site, to analyze the use of our Site and to cooperate with law enforcement.

By providing any Personal Data to CIC you warrant and represent that the information you provide is complete, accurate and correct. Your failure to do so will likely result in CIC being unable to contact you about your inquiries. It is your responsibility to update us if any of the information you provided is no longer correct or accurate, and to inform CIC of the required updates. In addition, if you provide us with Personal Data on behalf of another person or entity, you represent to us that you were authorized by that person or entity to allow us to collect and give us consent to use the submitted information.

**Website:** CIC's site, which can be accessed via this URL: [catalyst-ic.com](http://catalyst-ic.com)

**You:** a person or entity that is registered with CIC to use the Services.

**GDPR:** is an EU-wide privacy and data protection law that regulates how EU residents' data is protected by companies and enhances the control the EU residents have over their personal data.

The GDPR is relevant to any globally operating company and not just the EU-based businesses and EU residents. Our customers' data is important irrespective of where they are located, which is why we have implemented GDPR controls as our baseline standard for all our operations worldwide.

## 2. What personal information we collect, why we collect it, and how we used it

CIC collect Cookies, analytic tools, and log files in order to improve its performance, change and update CIC services and content offered on the Site also to monitor and ensure the orderly and proper operation and development of the Site and associated services and / or analyze and general statistical information with the goal of improving and customizing your experience and the content that is presented to you on the Site.

### Legal basis (GDPR only):

Types of personal data processed		Purposes of processing	Legal Basis
<b>When you visit our website</b>	we log your IP address. We collect additional Online Identifies via cookies placed on your browser. Such information includes the type of the visitor's operating systems, type of browser, access time and date, user's clickstream, visitor's actions on the website, browsing data (e.g., directing URL's), search queries, and approximate location. More information on how we use such technologies can be found in the Cookies section below.	We collect these types of information for the purpose of operating, providing, maintaining, protecting, managing, customizing, and improving our websites and services and the way in which we offer them; enhancing your experience with the websites and services; auditing and tracking usage statistics and traffic flow, and detecting fraud, security or technical issues in connection with our websites and services.  To protect the security or integrity of our website	Necessity of processing for the purposes of the legitimate interests of CIC, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data  Certain information is being collected upon your consent (when you agree to cookies settings).
<b>When you contact us</b>	Full name, contact information ( E-mail/ phone number), Job title, Company name, Country in order to process and answer questions and to customize your experience	to take steps at the request of the data subject prior to entering into a contract and for your legitimate interest.	Necessity of processing for the purposes of the legitimate interests of CIC, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.
<b>When you create an account and when you log in</b>	CIC collects your Email address, full name, country of	To create an account or to be able to log in or to be able to enjoy	Necessity of processing for the purposes of the legitimate interests of CIC, except where such

	Residence, phone number	features available to registered users only.	interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data  consent
<b>When you subscribe to our distribution list(s)</b>	CIC collects your full name, contact information (Email and phone number, job title, company name, country)	to send you newsletters for which you have subscribed (together with an unsubscribe option in each communication that is sent you).	Necessity of processing for the purposes of the legitimate interests of CIC, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data.  consent
<b>When you make use of, or interact with, our Site platform</b>	CIC collects your full name, address, Email, password, company name	To establish an account for return customers and to provide customer service activities.	Consent  Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
<b>When you engage in investment opportunities on the CIC platform</b>	CIC collects your financial and personal information (forms of identification, tax documentation, banking details, etc.)	necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering a contract.  to use in connection with CIC's KYC and investor evaluation processes.	Necessity of processing for the purposes of the legitimate interests of CIC, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data  consent .
<b>When applying for a job and throughout the application and recruitment process.</b>	CIC we will collect and process your personal data, such data includes: contact information (full name, email address, phone number), CV information	CIC will use this data to assess your skills, qualifications and consider your application and candidacy for the position you have applied for. As well as communicating with	CIC will process the data for the purposes of the legitimate interests of CIC, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require

	(education, experience, qualifications), performance information (information we infer from exams or evaluations you perform, as part of the recruiting process), feedbacks from managers or interviewers, recommendations from third parties, nationality (if relevant to the location of the position), and any other information you share with us (photos, feedback, survey's responses, etc.)	you regarding the recruitment processes.  In addition, we may use this data to comply with any legal or regulatory requirements.	protection of personal data.  In certain cases, where there is a legal requirement under applicable laws, we will process data based on this basis.
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CIC may use non-personally identifying information in the aggregate that we collect to provide statistical information about users of the Site (i.e., on an anonymous basis), to improve the quality, design, and content of our Site, to analyze the use of our Site and to cooperate with law enforcement. The information collected is used to improve our website usability and is stored and used for aggregated and statistical reporting.

**3. Update Privacy Policy**

We reserve the right to periodically revise or update this Privacy Policy. Any modifications to this Privacy Policy will go into effect upon the publication of the revised Privacy Policy on our website. We recommend that you periodically review this page to ensure that you understand our privacy practices and to check for any amendments.

**4. Sharing of Personal Information with Third Parties**

We are committed to maintaining your trust, and we want you to understand when and with whom we may share the information we collect.

- Authorized third-party vendors and service providers. We may share your information with third-party vendors and service-providers that help us with specialized services, including billing, payment processing, customer service, email deployment, business analytics, marketing, advertising, performance monitoring, hosting, and data processing. If you want to receive a full and updated list of our vendors, please send a request to [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com)
- Corporate affiliates. We may share your information with our corporate affiliates that are subject to this policy.
- Business transfers. We may share your information in connection with a substantial corporate transaction, such as the sale of a website, a merger, consolidation, asset sale, or in the unlikely event of bankruptcy.

- Legal purposes. We may disclose information to respond to subpoenas, court orders, legal process, law enforcement requests, legal claims or government inquiries, and to protect and defend the rights, interests, safety, and security of CIC, our affiliates, users, or the public.
- With your consent or at your direction. We may share information for any other purposes disclosed to you at the time we collect the information or pursuant to your consent or direction.

If you access third-party services, such as Facebook, Google, or Twitter, through the Sites to login to the Sites or to share information about your experience on the Sites with others, these third-party services may be able to collect information about you, including information about your activity on the Sites, and they may notify your connections on the third-party services about your use of the Sites, in accordance with their own privacy policies.

If you choose to engage in public activities on the Sites, you should be aware that any information you share there can be read, collected, or used by other users of these areas. You should use caution in disclosing personal information while participating in these areas. We are not responsible for the information you choose to submit in these public areas.

#### **5. Links**

The Site contains links to other sites. CIC is not responsible for and has no liability for privacy policies and/or practices on other sites.

#### **6. Security**

We implement extensive security measures to reduce the risks of damage, loss of information and unauthorized access or misuse of personal data. We implement appropriate data collection, storage and processing practices and security tools to protect personal data against unauthorized access, alteration, disclosure or destruction. If you have any questions about the security safeguards we use on the Website, please contact us by sending an email to [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com) or by contacting us in accordance with the "Contact Us" section below.

#### **7. Data retention**

We will retain your personal information for as long as is necessary to fulfill the purpose for which we obtained your personal information and any other permitted purposes permitted by law, and in compliance with our data retention policies. For example, we will retain and use your personal information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. If you wish to request access to your personal data or wish to cancel your account or request that we no longer use your information and/or wish to delete it from our database ("RIGHT TO BE FORGOTTEN"), please contact us at [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com). Note that following account cancellation we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

#### **8. Kids' Privacy**

You must be at least Eighteen (18) years old to register for or use the Site. Notwithstanding the foregoing, if you reside in a state, country or other jurisdiction that requires a higher minimum age for your use of the Site or participation in its activities, you must comply with the applicable law.

#### **9. Data subject rights**

The following rights (which may be subject to certain exemptions or derogations) shall apply to certain individuals (some of which only apply to individuals protected by the GDPR):

- The right to access Personal Data held about you.
- The right to request correction of personal data held about you.
- The right to request erasure of your personal data. Please note that it is necessary to retain your personal data, for example for the establishment, exercise or defense of legal claims.
- The right to object to or to request restriction of the processing.
- The right to object to profiling.
- • The right to withdraw your consent at any time. Please note that there may be circumstances in which we may continue to process your data if the processing is necessary to comply with our legal and regulatory obligations.
- The right to request certain details of the basis on which your Personal Data is transferred outside the European Economic Area, but data transfer agreements and/or other details may need to be partially redacted for reasons of commercial confidentiality.
- The right to lodge a complaint with your local data protection supervisory authority (i.e., your place of habitual residence, place or work or place of alleged infringement) at any time or before the relevant institutions in your place of residence. We ask that you please attempt to resolve any issues with us before you contact your local supervisory authority and/or relevant institution.

You may exercise the rights set forth in this Privacy Statement to the extent these rights apply to you by contacting CIC via the contact information listed herein.

. You can also request that we close your CIC account, or request that we no longer use your information to provide you Services, by emailing Customer Service at [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com) After we close your account, we may retain some information if we believe it may be necessary to prevent fraud, assist with investigations, resolve disputes, analyze, or troubleshoot programs, if required by law, enforce our Terms of Use and take actions otherwise permitted by law. Notwithstanding the foregoing, if you are an active investor on the CIC platform, it would not be possible to close your CIC account while any investment(s) is/are actively managed by CIC.

## **11. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA/DELAWARE PRIVACY LAW**

California consumers have a right to knowledge, access, correction, and deletion of their personal information under the California Consumer Privacy Act. California consumers also have a right to opt out of the sale or sharing of their personal information by a business, and a right not to be discriminated against for exercising their California privacy rights. California consumers have a right to lodge a complaint with your local data protection supervisory authority CIC does not sell or share the personal information of California consumers, as those terms are defined under California law, and does not discriminate in response to privacy rights requests. CIC also does not use or disclose sensitive personal information for any purposes that would require a user to exercise a right to limit according to California law.

You may exercise the rights set out in this privacy statement to the extent that those rights apply to you by contacting CIC using the contact details provided here. We will undertake to respond to your request within the relevant time frame established by the applicable law, and in any case we will make efforts to respond within 30 days from the date of receipt of your request.

### **12. Choice/Opt-out.**

CIC uses personal information to send you updates, emails, newsletters, marketing, or promotional materials in accordance with each of your personal files, all subject to the user's right to notify the CIC in writing of his wish not to be used as aforesaid. The use of the information as detailed above may be made by CIC and/or anyone on its behalf and/or a service provider, provided that it has accepted the provisions of the Privacy Policy. If you no longer wish to receive additional information or promotional materials from CIC, you may opt-out of receiving these communications by using

the opt-out mechanism described in the relevant email. The personal information you provide to the CIC will be stored in the Company's database, which is duly registered. Database number: .....

## 12. LOG Files

We use log files. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

## 13. Analytic tools

- The Website uses different tools e.g., “**Google Analytics**” or “**Mixpanel**” or “**Inspectlet**” to collect information about use of the Website. The information collected includes such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from webs to maintain and improve the Website and our products when the ability to use and share this information is governed by this website Terms of Use.
- CIC is not responsible for and has no liability for privacy policies and/or practices on other sites. We advise you to read the privacy policy stated on other websites you link to through the Website. Our privacy policy only governs information that we collect on the Website.

**Advertising Partners.** Through our services, we may allow third party advertising partners to set technologies and other tracking tools to collect information regarding your activities and your device (e.g., your IP address, mobile/website identifiers, page(s) visited, location, time of day). We also may combine and share such information and other information (such as demographic information and past purchase history) with third party advertising partners. These advertising partners will potentially use this information (and similar information collected from other websites) for the purpose of delivering targeted advertisements to you when you visit third party websites within their networks. This practice is commonly referred to as “interest-based advertising” or “online behavioral advertising. We may allow access to other data collected by the services to share information that may be useful, relevant, valuable, or otherwise of interest to you. If you prefer not to share your Personal Information with third party advertising partners, you may let us know.

We reserve the right to remove or add new analytic tools.

## 14. Notification of changes

We may make changes to this Privacy Statement from time to time. The "Effective Date" at the top of this page shows when this Privacy Statement was last revised. Any changes will become effective when we post a revised version of this Privacy Statement on this Site. Your use of this Site is subject to the terms in the version of this Privacy Statement that is posted on this Site at the time of your visit. We encourage you to review this Privacy Statement periodically to remain informed about how we are protecting your data.

This policy may change from time to time, and we will post the amended terms on the CIC Site and/or notify you by email of major changes. Any changes will become effective when we post a revised version of this Privacy Statement on this Site. Your use of this Site is subject to the terms in the version of this Privacy Statement that is posted on this Site at the time of your visit. We encourage you to review this Privacy Statement periodically to remain informed about how we are protecting your data.

Your continued use of the Site after any changes to this Privacy Statement have been posted signifies your acceptance of those changes. If you do not agree to the revised Privacy Statement, please refrain from using our products or services and contact us by sending an email to : [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com)

## 15. Questions

If you have any comments or questions regarding this Privacy Statement or our data handling practices, you may contact us at: [hello@catalyst-ic.com](mailto:hello@catalyst-ic.com)

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