

## GDPR PRIVACY POLICY

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We at Avrio Wealth Pte Ltd (“Avrio,” “we,” “us,” or “our”) have created this privacy policy (this “Privacy Policy”) because we know that you care about how information you provide to us is used and shared. This Privacy Policy relates to our information collection and use of your information through our website located at <https://avriowealth.com/> (the “Site”).

By visiting our Site, you are agreeing to the terms of this Privacy Policy and the accompanying Terms of Use. Please note that to the extent that we utilize the personal data of an individual located in the European Economic Area (“EEA Individuals”), we also discuss relevant General Data Protection Regulation (2016/679) (“GDPR”) information within the **GDPR Disclosure** section below.

### **The Information We Collect and/or Receive**

In the course of operating the Site, we will collect (and/or receive) the following types of information. You authorize us to collect and/or receive such information.

1. Contact Information.

Contact information is used to respond to your queries.

2. Other Information.

In addition to the Contact Information, we may collect additional information (the “Other Information”).

Such Other Information may include:

a. From Your Activity. When visiting the Site, your browser makes an HTTP request to our web server. This HTTP request contains certain information logged by our web server including, without limitation, IP address, browser type and language, referring and exit pages and URLs, date and time, amount of time spent on particular pages, what sections of the Site visitors visit, and similar information concerning your use of the Site.

b. From Cookies. We collect information using “cookie” technology. Cookies are small packets of data that a website stores on your computer’s or mobile device’s hard drive so that your computer will “remember” information about your visit. We use session cookies, which expire once you close your web browser, to help us collect Other Information and to streamline your experience using the Site. If you do not want us to place a cookie on your hard drive, you may be able to turn that feature off on your computer or mobile device. Please consult your Internet browser’s documentation for information on how to do this and how to delete persistent cookies, as applicable. However, if you decide not to accept cookies from us, the Site may not function properly as we only use cookies that are technically necessary for functioning of the Site; we do not use any third-party analytics, web audience measurement, or retargeting services.

### **How We Use and Share the Information**

You authorize us to use your Contact Information to provide information about our investment research and, subject to applicable law, potentially inform you about our company’s products and services.

You also authorize us to use and/or share your Contact Information and other Information (collectively, "Information") with any of our affiliates, subsidiaries, or other companies under common control with us and as described below:

- Business Transfers. As we develop our businesses, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, sale of assets, dissolution, or similar event, your Information may be part of the transferred assets.
- Legal Requirements. To the extent permitted by law, we may also disclose your Information: (i) when required by law, court order, or other government or law enforcement authority or regulatory agency; or (ii) whenever we believe that disclosing such information is necessary or advisable, for example, to protect the rights, property, or safety of AVRIO or others.

### **Accessing and Modifying Information and Communication Preferences**

If you have provided us any personal information, you may access, remove, review, and/or make changes to the same by contacting us at you may manage your receipt of marketing and non-transactional communications by clicking on the "Unsubscribe" link located on the bottom of any applicable marketing e-mail. We will use commercially reasonable efforts to process such requests in a timely manner. You should be aware, however, that it is not always possible to completely remove or modify information in our subscription databases.

### **How We Protect the Information**

We take commercially reasonable steps to protect your Information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. Please understand, however, that no security system is impenetrable. We cannot guarantee the security of our databases or the databases of the third parties with which we may share such information, nor can we guarantee that the information you supply will not be intercepted while being transmitted over the Internet. In particular, e-mail sent to us may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail.

### **External Sites**

The Site may contain links to External Sites. AVRIO has no control over the privacy practices or the content of these External Sites. As such, we are not responsible for the content or the privacy policies of those External Sites. You should check the applicable third-party privacy policy and terms of use when visiting any External Sites.

### **Children**

We do not knowingly collect personal information from children under the age of 13 through the Site. If you are under 13, please do not give us any personal information. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal information through the Site without their permission. If you have reason to believe that a child under the age of 13 has provided personal information to us, please contact us, and we will endeavor to delete that information from our databases.

### **Important Notice to Non-U.S. Residents**

The Site and its servers are operated in the United States. If you are located outside of the United States, please be aware that any information you provide to us maybe transferred to, processed, maintained, and used on computers, servers, and systems located outside of your state, province, country, or other governmental jurisdiction where the privacy laws may not be as protective as those in your jurisdiction.

## **Changes to This Privacy Policy**

This Privacy Policy is effective as of the date stated at the top of this Privacy Policy. We may change this Privacy Policy from time to time with or without notice to you, to the extent permitted by applicable law. Any such changes will be posted on the Site. To the extent permitted by applicable law, by accessing the Site after we make any such changes to this Privacy Policy, you are deemed to have accepted such changes. Please be aware that, to the extent permitted by applicable law, our use of your information is governed by the Privacy Policy in effect at the time we collect the Information. Please refer back to this Privacy Policy on a regular basis.

## **How to Contact Us**

If you have questions about this Privacy Policy, please contact us via e-mail at [info@avriowealth.com](mailto:info@avriowealth.com) with "Privacy Policy" in the subject line.

## **GDPR Disclosure**

In addition to the above, please see below GDPR-related disclosures for EEA Individuals. To the extent there is a conflict between this GDPR Disclosure and any other provision of this Privacy Policy, this GDPR Disclosure shall control with respect to EEA Individuals.

Legal Basis and Purpose: AVRIO acts as "data controller" of the Contact Information and Other Information collected on the Site for the purposes and under the legal bases described below:

- Contact Information: We provide our investment research and investment management pursuant client agreements and our legitimate interest in providing investment research materials to interested EEA Individuals. Note that EEA Individuals must affirmatively sign up to receive such materials. Such information will be retained to provide the subscription or to effectuate any "opt-outs" unless deletion of such information is requested. In some cases the information may not be able to be deleted.,
- Other Information: We collect Other Information so that individuals can connect and use the Site, and to maintain security audit logs to remove or defend against malicious visitors or attackers (e.g., thwarting DDOS attacks). This information is logged internally within the web servers that host our Site and stored on an ongoing basis.

Data Transfer: The above Information is transferred to the United States as necessary to provide the subscription and enable or protect the Site, respectively, pursuant to the terms of this Privacy Policy and GDPR Article 49(1)(b). Please also see Business Transfers and Legal Requirements above.

Your GDPR Rights: Natural persons have a right to: (i) request access to, correction and/or erasure of their personal data; (ii) object to processing of their personal data; (iii) restrict processing of their personal data; and (iv) request a copy of their personal data, or have a copy thereof sent to another controller, in a structured, commonly used and machine readable format under the right of data portability. These rights may be exercised by contacting: Ann Marie Regal, CEO, [info@avriowealth.com](mailto:info@avriowealth.com). Natural persons also have the right to lodge a complaint about the processing of their personal data with a data protection authority.

Objecting to Legitimate Interest/Direct Marketing: Natural persons may object to personal data processed pursuant to the firm's legitimate interest. In such case, AVRIO will no longer process their personal data unless AVRIO demonstrates appropriate overriding legitimate grounds for the processing or if needed for the establishment, exercise, or defense of legal claims. Natural persons also may object at any time to processing of their personal data for direct marketing purposes (such as opting out of investment research emails, see Accessing and Modifying Information and Communication Preferences above). In such case, their personal data shall no longer be used for that purpose.

EU Representative: The firm does not have a representative physically in the EU as the firm manages the US assets of EEA/EU clients. The person responsible for EU regulations and EU clients is : Ann Marie Regal, CEO located at: [info@avriowealth.com](mailto:info@avriowealth.com)