

PRIVACY POLICY

1. GENERAL PROVISIONS

Khabarov & Co. Limited ("we," "our," or "the Company") is committed to ensuring that your personal data is handled in compliance with applicable data protection laws. This Privacy Policy explains how we collect, use, store, and share your personal data.

For the purposes of data protection laws, Khabarov & Co. Limited acts as the data controller of your personal data. "Personal data" refers to any information that can identify you or that we can link to you, and that we have in our possession or control.

By using our website, www.khabarovandco.com ("Website"), or interacting with our services, you agree to the terms of this Privacy Policy. If you do not agree with these terms, please refrain from using the Website.

For questions or concerns regarding this Privacy Policy, please contact our compliance team at kcl-compliance@proton.me.

2. WHAT PERSONAL DATA WE COLLECT

We collect personal data directly from you or through your use of the Website and services. This includes, but is not limited to:

- **Contact Information:** Name, email address, phone number, and physical address.
- **Identification Data:** Passport number, government-issued identification, nationality, and date of birth.
- **Financial Information:** Payment details or proof of assets when required for compliance.
- **Technical Data:** IP address, browser type, operating system, and device identifiers.
- **Documentation:** Residency proof, utility bills, or additional compliance-related documents.

We may also collect data automatically through cookies and tracking technologies, as detailed in the Cookies and Tracking Technologies section of this Policy.

In jurisdictions governed by GDPR or equivalent laws, we ensure explicit consent is obtained when collecting sensitive personal data.

3. PURPOSE OF DATA PROCESSING

We process your personal data for the following purposes:

- **Provision of Services:** To deliver our services, including communication, account management, and customer support.
- **Compliance with Legal Obligations:** To fulfill our obligations under applicable laws, such as AML (Anti-Money Laundering) and KYC (Know Your Customer) regulations.

- **Security and Fraud Prevention:** To ensure the security of our systems and detect or prevent fraud and unauthorized access.
- **Personalization and Improvements:** To enhance your experience on the Website by tailoring content and services to your preferences.
- **Marketing and Communication:** To share company updates, promotions, or other information, subject to your consent where required.

We will not process your personal data for purposes not stated in this Policy unless we obtain your prior consent or the processing is otherwise permitted under applicable laws.

4. DATA SHARING AND TRANSFERS

We may share your personal data with third parties in the following circumstances:

- **Service Providers:** To trusted third parties who assist us in providing our services, such as payment processors, data storage providers, or compliance verification platforms.
- **Legal and Regulatory Requirements:** To comply with applicable laws, regulations, or requests from government authorities, regulatory bodies, or law enforcement agencies.
- **Corporate Transactions:** In the event of a merger, acquisition, or sale of all or part of the Company's assets, your data may be transferred as part of the transaction.
- **With Your Consent:** To third parties when you have explicitly consented to the sharing of your data.

International Data Transfers

If we transfer your personal data to jurisdictions outside your country of residence, we will ensure that appropriate safeguards are in place to protect your data, such as standard contractual clauses approved by regulatory authorities or equivalent legal mechanisms.

We do not sell your personal data to third parties.

5. DATA RETENTION POLICY

We retain your personal data only for as long as necessary to fulfill the purposes outlined in this Privacy Policy or as required by applicable laws and regulations.

Retention Periods

- **Legal and Compliance Obligations:** Data required for regulatory or compliance purposes is retained for the minimum period mandated by law.
- **Account Information:** Personal data associated with your account is retained as long as your account is active or as required to provide you with our services.
- **Marketing and Communications:** Data used for marketing purposes is retained until you withdraw your consent or opt out.

Data Deletion

You have the right to request the deletion of your personal data. We will comply with such requests unless the data is required to fulfill our legal obligations or resolve disputes.

Data Storage Partners

Your data is securely stored using trusted third-party providers to ensure compliance with GDPR and other data protection regulations.

- **Proton AG:** Provides encrypted and secure data storage solutions.

We do not share or store your data with unapproved third-party organizations.

6. USER RIGHTS

As a user, you have the following rights under applicable data protection laws:

6.1 Right to Access

You can request a copy of the personal data we hold about you and verify how we process it.

6.2 Right to Rectification

If your personal data is inaccurate or incomplete, you have the right to request corrections.

6.3 Right to Erasure ("Right to Be Forgotten")

You may request the deletion of your personal data unless its retention is required for legal or regulatory purposes.

6.4 Right to Restrict Processing

You can request that we limit the processing of your personal data under certain circumstances, such as during the verification of accuracy.

6.5 Right to Data Portability

You have the right to receive your personal data in a structured, commonly used, and machine-readable format and to request its transfer to another data controller where feasible.

6.6 Right to Object

You may object to the processing of your personal data for specific purposes, such as direct marketing.

6.7 Right to Withdraw Consent

If we rely on your consent for processing, you may withdraw it at any time without affecting the lawfulness of processing conducted prior to withdrawal.

How to Exercise Your Rights

To exercise any of your rights, please contact us at kcl-compliance@proton.me. We may request additional information to verify your identity and process your request promptly.

7. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar tracking technologies to enhance your browsing experience, improve the functionality of our Website, and analyze user behavior.

7.1 What Are Cookies?

Cookies are small text files that are stored on your device when you visit a website. They allow the Website to recognize your device and remember certain information about your preferences and activity.

7.2 Types of Cookies We Use

- **Essential Cookies:** Required for the proper functioning of the Website.
- **Performance Cookies:** Help us understand how users interact with the Website to improve its functionality.
- **Functional Cookies:** Enable personalization, such as remembering your preferences.
- **Targeting/Advertising Cookies:** Used to deliver relevant advertisements or measure the effectiveness of advertising campaigns.

7.3 Managing Cookies

You can control and manage cookies through your browser settings. Please note that disabling certain cookies may affect the functionality of the Website.

7.4 Third-Party Cookies

We may allow third-party service providers to place cookies on your device for analytics, advertising, or other purposes. These providers include, but are not limited to, Google Analytics.

7.5 Consent

By using the Website, you consent to the use of cookies as described in this section. You may withdraw your consent at any time by adjusting your browser settings or contacting us.

8. SECURITY MEASURES

We take the security of your personal data seriously and implement industry-standard measures to protect it from unauthorized access, alteration, disclosure, or destruction.

8.1 Encryption and Access Control

- All sensitive data is encrypted both in transit and at rest.
- Access to your personal data is restricted to authorized personnel who require it to perform their duties.

8.2 Two-Factor Authentication

We employ mandatory two-factor authentication (2FA) for all user accounts and administrative systems to enhance security.

8.3 Regular Security Audits

Our systems are subject to regular security audits and vulnerability assessments to ensure compliance with industry standards and best practices.

8.4 Breach Response Protocol

In the event of a data breach:

- We will notify affected users within 72 hours of discovering the breach.
- We will report the incident to relevant regulatory authorities as required by law.

8.5 Third-Party Security

We work only with trusted partners, such as Proton AG, to ensure your data is securely stored and processed in compliance with GDPR and other data protection regulations.

Your trust is our priority, and we continuously strive to enhance our security measures to safeguard your personal data.

9. CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy from time to time to reflect changes in our practices, services, or legal obligations.

9.1 Notification of Changes

If we make significant changes to this Privacy Policy, we will notify you by:

- Posting the updated version on our Website with a new effective date.
- Sending a notification via email if you have provided your contact information.

9.2 Effective Date

The updated Privacy Policy will take effect on the date indicated in the revised version. Your continued use of the Website or our services after the effective date constitutes acceptance of the updated terms.

We encourage you to review this Privacy Policy periodically to stay informed about how we protect your data.

10. CONTACT INFORMATION

If you have any questions, concerns, or requests regarding this Privacy Policy or the use of your personal data, please contact us:

- **Company Name:** Khabarov & Co. Limited
- **Registered Office:** 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ
- **Email:** kcl-compliance@proton.me

We will respond to your inquiries as promptly as possible and within any timeframes required by applicable laws.