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**SOSNA GEMS INVESTMENTS INC.**

7901 4th St N, Ste 300, St. Petersburg, FL, 33702, USA

EIN: 32-0763482

Legal Form: Corporation

**Document No.: EN 006/2024**

**Document Title: Privacy Policy**

**Date of Issue: February 15, 2024**

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**Prepared by: Legal Department**

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## **1. GENERAL PROVISIONS**

1.1 This Privacy Policy (“Policy”) governs the processing and protection of personal data of clients, investors, users, and business partners of **SOSNA GEMS INVESTMENTS INC.** (“the Company”).

1.2 The Company complies with all applicable data protection laws, including but not limited to:

- **GDPR (European Union)**
- **CCPA (California, USA)**
- **UK Data Protection Act**
- **U.S. Federal laws**, including SEC, FINCEN, and IRS requirements

1.3 The Company honors the data privacy rights of residents of all U.S. states, including California, Florida, Texas, and New York, and enables individuals to exercise their rights under the CCPA and any other applicable state-level privacy laws.

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## **2. SCOPE OF PERSONAL DATA COLLECTED**

2.1 The Company processes the following categories of personal data:

- **Identification data:** full name, date of birth, gender, nationality
- **Contact details:** address, e-mail, phone number
- **Payment information:** bank account or card data (in compliance with PCI DSS)
- **AML/KYC documents:** copy of passport, national ID, proof of address
- **Technical data:** IP address, cookies, device data, geolocation
- **Transaction history:** investment records, purchases, transfers

2.2 The Company does not process special categories of sensitive personal data (such as health, religion, or political beliefs).

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### 3. PURPOSES OF DATA PROCESSING

The Company processes personal data solely for the following purposes:

- To fulfill contractual and investment obligations
- To meet legal obligations, including AML/KYC requirements and regulatory reporting to SEC, FINCEN, IRS, and other authorities
- To prevent fraud and ensure security of accounts and transactions
- To provide customer service and support
- To send marketing communications (subject to prior consent)
- To personalize website content and user experience

Data processing also takes place to comply with applicable U.S. legal requirements.

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### 4. LEGAL BASIS FOR PROCESSING

Data is processed on the basis of:

- **Performance of a contract**
- **Legal obligations**
- **Legitimate interest** (fraud prevention, system security)
- **Explicit consent** (e.g., for marketing)

The Company also complies with the **Federal Trade Commission Act**, which prohibits unfair or deceptive practices in the use of personal data.

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### 5. DATA RETENTION PERIOD

- Accounting and tax records: 10 years
  - AML/KYC documentation: 7 years after termination of business relationship
  - Marketing data: until consent is withdrawn
  - Technical and operational data: typically retained for 3 years
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### 6. DATA RECIPIENTS

Personal data may be shared with the following categories of recipients:

- Regulatory authorities: SEC, FINCEN, IRS, EU data protection offices

- Financial institutions
  - Technology providers (e.g., secure cloud hosting, cybersecurity services)
  - Legal and tax advisors
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## 7. RIGHTS OF DATA SUBJECTS

Each data subject has the following rights:

- Right to access – obtain a copy of their personal data
  - Right to rectification – correct inaccurate or incomplete data
  - Right to erasure (“right to be forgotten”) – under applicable conditions
  - Right to restrict processing – temporarily limit data use
  - Right to data portability – obtain data in a machine-readable format
  - Right to object – to processing based on legitimate interest
  - Right to file a complaint with a data protection authority
  - **California residents** have the right to opt out of the sale of their personal data under the **CCPA**, and this right is fully respected by the Company
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## 8. DATA SECURITY

The Company applies the following safeguards to protect personal data:

- Strong encryption and secure server infrastructure
  - Strict access control (authorized personnel only)
  - **Two-factor authentication (2FA)** for systems with sensitive data
  - Regular audits, penetration testing, and employee security training
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## 9. CONTACT INFORMATION

For any questions or requests regarding personal data, please contact:

- E-mail: **info@sosnagems.com**
  - Mailing address: 7901 4th St N, Ste 300, St. Petersburg, FL, 33702, USA
  - Phone: +1 (727) 383-6970
  - **Data Protection Officer:** Lenka Macurová (Chief Compliance Officer)
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**Approved on behalf of the Company:**

**Date: February 15, 2024**

**Martin Sosna**

Chief Executive Officer (CEO) and Member of the Board of Directors  
**SOSNA GEMS INVESTMENTS INC.**

