

1. GENERAL

1.1 Alteneiji Incorporate Group OÜ (Estonian registry code , hereinafter “E-Advisors”) respects your privacy. This Privacy Policy (“Policy“) explains E-Advisors’ privacy practices for this website <https://alteneiji-group.com/> (“Website”) in addition to information provided in the Terms of Business (available at the Website). The Policy describes the ways your personal information is collected and used. It governs the privacy practices related to our provision of the Services and Tasks (as defined in the Terms of Business) and the Website.

2. PURPOSE OF THIS PRIVACY POLICY

2.1 E-Advisors respects your privacy and is committed to protecting your personal data. This Privacy Policy will inform you how your personal data is being used when you visit our website (regardless of where you visit it from) and for the provision of Services and Tasks and gives information on your privacy rights and how the law protects you.

2.2 This Privacy Policy aims to give you information on how E-Advisors collects and processes your personal data through your use of the Website, including any data you may provide through this Website when you sign up to our newsletter or alerts, or purchase any Task or Service that we offer.

2.3 The Website and the provision of Services and Tasks are not intended for persons under 18 years old and we do not knowingly collect data related to underage persons.

2.4 It is important that you read this Privacy Policy together with any other Privacy Policy or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Privacy Policy supplements any other notices and is not intended to override them.

3. CONTROLLER

3.1 E-Advisors is the controller and responsible for your personal data.

3.2 E-Advisor's Data Protection Officer can be contacted at info@alteneiji-group.com for questions related to the processing of personal data. If you are dissatisfied, you have the right to lodge a complaint with the supervisory authority for data protection issues as stated in paragraph 12.2. We would, however, appreciate the chance to deal with your concerns before you approach the Estonian Data Protection Inspectorate (AKI) so please contact us in the first instance.

4. WHAT INFORMATION E-ADVISORS COLLECTS, WHY AND WHEN?

4.1 We collect personally identifiable information from you when you register as a Client, respond to a survey or marketing communication, fill out a form on our Website or in any other circumstance listed in 5.1.

4.2 The data encompasses anything you send us and consists of the following:

4.2.1. When signing a separate contract or agreement for the purposes/activity listed in 5.1, we will require you to provide us with personal information, such as your name and contact details. You must provide complete, accurate and correct details and you hereby confirm the details you provided are correct. You are not required by law to provide us with your personal details. However, we may refuse to enter into agreement with you if you do not provide us with the requested data that is necessary for each activity. If you provide false, incorrect, or outdated information, or only partial information, it may impair our ability to contact you. By not providing your information, we might not be able to offer you our Services and/or complete our Tasks.

4.2.2. When you provide us with personal details of another person, you represent and warrant that you received the other person's explicit written consent to provide these

details to us and use them according to this Policy. We may collect information pertaining to your activity on the Website, including information or content that you have read, your session durations, the web pages you watched, services that were of interest to you, the location of the computer and the Internet Protocol (IP) address through which you had access to the Website and more. Additionally, we may collect or use the assistance of third parties to collect and analyse anonymous, statistic or aggregative information related to your use of the Website.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

5.1 When fulfilling an agreement, providing Services or performing a Task, the E-Advisors' client may provide to E-Advisors or E-Advisors may collect, store, use and otherwise process personal data in the following activities and for the following purposes:

| Purpose/Activity | Type of data | Lawful basis for processing |
|--|--|---|
| <p>Enter the potential client in the database, drafting and sending offer and sending reminder regarding offer</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number ● Residency address ● Tax residency ● Copy of passport | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract ● Necessary for compliance with a legal obligation to which the controller is subject ●Necessary for the legitimate interests pursued by the controller |

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| <p>Service of establishing a company</p> | <p>The following personal data may be processed depending on the situation:</p> <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number ● Home address ● Marital Status ● House bills ● Bank statement or letter of recommendation ● Copy of e-residency card ● Copy of passport | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract ●Necessary for the legitimate interests pursued by the controller |
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| <p>Other services (applying for licenses, opening bank account, applying for e-residency, visa and residence permit)</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number ● Home address ● Criminal record ● CV <p>The following personal information may still be collected depending on the service</p> <ul style="list-style-type: none"> ● Photo ● Copy of e-residency card ● Copy of passport ● Bank statement or letter of recommendation ● House bills ● Marital Status | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the legitimate interests pursued by the controller |
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| | <p>Information on shareholder in company related documents</p> <ul style="list-style-type: none"> ● Information on the UBO ● Name of the company established for the client ● Address ● Activity ● Registry code ● VAT number ● Client's company contracts and invoices | |
| <p>Legal services</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number ● Residency ● Home address | <ul style="list-style-type: none"> ● Data subject has given consent ● Necessary for the performance of a contract ● Necessary for the legitimate interests pursued by the controller |

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| <p>Virtual office service</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number ● Home address ● Personal data contained in the telephone call from the call centre service | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract ●Necessary for the legitimate interests pursued by the controller |
| <p>Sending birthday greetings</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Birthday | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the legitimate interests pursued by the controller |
| <p>Hire employees</p> | <ul style="list-style-type: none"> ● Curriculum Vitae | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the legitimate interests pursued by the controller |

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| <p>Create user profile for employees</p> | <ul style="list-style-type: none"> ● Name and Surname ● ID personal code ● Phone Number ● E-mail address ● Information from personal ID card | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract |
| <p>Concluding employment contract</p> | <ul style="list-style-type: none"> ● Name and Surname ● ID personal code ● Phone number ● E-mail address ● Personal identification details (company name, address, registration code) ● Bank account number | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract |

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| <p>Make salary slips for employees</p> | <ul style="list-style-type: none"> ● Employee's name and surname ● ID personal code ● Phone number ● E-mail address ● Personal identification details (company name, address, registration code) ● Bank account number | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract |
| <p>Administer IT system</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Any other personal data required ● Data stored in the IT systems | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the legitimate interests pursued by the controller |

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| <p>Digital Marketing</p> | <ul style="list-style-type: none"> ● E-mail address | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the legitimate interests pursued by the controller |
| <p>Management of debts</p> | <ul style="list-style-type: none"> ● Name and Surname ● E-mail address ● Phone number <p>Depending on the situation, other data that is needed for debt management.</p> | <ul style="list-style-type: none"> ●Data subject has given consent ●Necessary for the performance of a contract ●Necessary for the legitimate interests pursued by the controller |
| <p>Archiving documents</p> | <ul style="list-style-type: none"> ● Name and surname ● E-mail address ● Any other personal data required ●Data contained in documents to be archived | <ul style="list-style-type: none"> ● Necessary for compliance with a legal obligation to which the controller is subject ●Necessary for the legitimate interests pursued by the controller |

6. HOW WE USE YOUR INFORMATION

6.1 We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

6.1.1 Where we need to perform a Service or Task, we are about to enter into or have entered into with you.

6.1.2 Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

6.1.3 Where we need to comply with a legal or regulatory obligation.

6.2 We may use the information we collect as described in the previous section in the following ways:

6.2.1 To provide you a Service or Task.

6.2.2 To quickly process your requests.

6.2.3 To improve our Website in order to better serve you.

6.2.4 To allow us to better service you in responding to your customer service requests.

6.2.5 To send periodic emails regarding your order or other Tasks and Services.

6.2.6 To follow up with them after correspondence (e.g. email, live chat, or phone inquiries).

6.2.7 To personalize your experience and to allow us to deliver the type of content and product offerings in which you are most interested.

6.3 We will store the information you provide and the information we collect about you in the following databases (depending on the purpose of the data): Scoro, Outlook, Skype, accounting software, in our IT system and in our archives. We will use the information in accordance with this Policy and any applicable law, including for the following purposes:

6.3.1 To develop and improve our products and services as a whole, and to improve and expand the services and content offered, to create new services and content which correspond to the requirements and expectations of our clients and to modify or cancel existing services and content.

6.3.2 To contact you occasionally, either by us or by anyone on our behalf, including by sending email messages and information related to our services and products;

6.3.3 To analyse and provide statistical information to third parties. This information will not identify you personally;

6.3.4 For the orderly and proper operation and development of the Website;

6.3.5 To any other purpose specified in this Policy or in the Terms of Business.

7. COOKIES AND ANALYTICS

7.1 The Website might use cookies and other behaviour tracking technologies. They might be used to help us understand your preferences based on previous or current site activity, which enables us to provide you with improved services and supply additional security measures. We compile aggregate data about site traffic and site interaction so

that we can offer better site experiences and tools in the future. We may also use trusted third-party services that track this information on our behalf.

7.2 When you access our Website, we collect information about your device, which includes, but is not limited to, your IP address, time spent on the Website and number of clicks. This information is collected with the purpose of creating analytics.

7.3 Cookies are small files that a site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the site's or service provider's systems to recognize your browser and capture and remember certain information.

7.4 You can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. You do this through your browser settings. Since every browser is a little different, look at your browser's Help Menu to learn the correct way to modify your cookie settings.

7.5 We use strictly necessary cookies (Google Analytics default cookies), analytical cookies (Google Analytics demographic data and retargeting) and advertising cookies (Facebook, Google Ads, Adform, and LinkedIn retargeting cookies).

7.6 We do not include or offer third-party products or services on our Website, other than listing systems compatible with our products.

7.7 Cookie data used for advertising is stored in the channel's own cloud solutions.

8. OBLIGATIONS AS PROCESSOR

8.1 If acting as a processor, E-Advisors will:

8.1.1 Collect, process and use personal data only within the scope of controller's instructions. If E-Advisors cannot use Personal Data in accordance with the instructions due to a legal requirement, E-Advisors notifies the controller of that legal requirement and cease all processing until the controller issues new instructions with which processor is able to comply.

8.1.2 Take the appropriate technical and organizational measures to adequately protect personal data.

8.1.3 Ensure that its staff is subject to confidentiality obligations, that shall continue after the termination of the Service or Task, with respect to that personal data.

8.1.4 Notify the controller if it becomes aware of any breach of personal data.

8.1.5 Delete personal data on the general terms of this Policy.

8.2 E-Advisors are entitled to engage sub-processors to fulfil any of the activities listed in 5.1 If a sub-processor is unable to perform its data protection obligations, E-Advisors will remain liable to the controller for the performance of such obligations. Sub-processors are located exclusively in a European Economic Area country.

9. HOW WE PROTECT YOUR INFORMATION

9.1 Our Website is scanned on a regular basis for security holes and known vulnerabilities in order to make your visits as safe as possible.

9.2 Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential.

9.3 Our Website uses a HTTPS protocol that ensures the security of data exchanged via Transport Layer Security (TLS) protocol. The TLS provides three layers of protection: encryption, data integrity and authentication.

10. THIRD-PARTIES

10.1 We do not sell or trade or offer any of your personally identifiable information to any third parties. This does not include trusted third parties who assist us in operating our Website, conducting our business, or providing services to you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others' rights, property, or safety, or comply with KYC and AML checks.

10.2 However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

10.3 We do not include or offer third-party products or services on our Website, although there might be links to third-party websites on our Website. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked sites. Nonetheless, we seek to protect the integrity of our site and welcome any feedback about these sites.

10.4 E-Advisors may transmit data to third countries, complying with the requirements set out in the legislation, and by adopting appropriate measures to ensure data security.

10.5 We may share personal information outlined in this policy, with others, in any of the following instances:

10.5.1 With our service providers (such as IT provider and other service provider partners) in order to operate, maintain and enhance the Website and facilitate our email communications with you;

10.5.2 Employees and managers of E-Advisors, co-operation partners, public authorities, umbrella and professional organizations, etc., if this is reasonably necessary for the purposes of the Task or the Services.

10.5.3 With authorities or other third parties if you abuse your rights to use the Website, or violate any applicable law, and we believe it is necessary or justified and allowed by law;

10.5.4 With attorneys, courts and relevant third parties, in any case of dispute, or legal proceeding of any kind involving you with respect to the Website;

10.5.5 With our corporate group entities (companies that we control, control us, or are under common control with us, whether directly or indirectly), but their use of such information must comply with the policy; and

10.5.6 In any case other than above, your personal information will be shared with others only if you provide your explicit prior consent.

11. YOUR RIGHTS UNDER THE GDPR

11.1 Right of access

The GDPR gives you the right to access information that we held about you. If you want to access that information, please send your request at info@alteneiji-group.com

Any request for access of your information shall be a subject to providing the acceptable proof of identification. If all complies, you will be provided with the copy of your personal

data. If a person's request for information or measures is clearly unjustified or excessive, a reasonable fee may be asked, or the action taken may be refused.

11.2 Right of rectification

You can have your personal data rectified at any time, in case it is inaccurate or incomplete. You should notify us to correct or update your personal data. You can notify us at any time at info@alteneiji-group.com

11.3 Right of erasure

You can request to delete your personal data at any time by contacting us at info@alteneiji-group.com. The requirement to terminate personal data processing can only be performed by E-Advisors when the legal basis for the processing of such personal data has expired.

11.4 Right to restrict processing

In certain circumstances, you have a right to restrict or block us from processing your personal data.

11.5 Right to withdraw your consent

In certain circumstances, you have the right to withdraw your consent to processing of your personal data at any time by contacting us at info@alteneiji-group.com

11.6 Right to data portability

You have a right to request the personal data from us and reuse this data for other services. If E-Advisors intends to process your personal data for purposes other than

those for which they were originally collected, you will be informed in advance of the purpose of further processing the data in question.

11.7 Right to object

At any given time, you have a right to object to the processing of your personal data.

11.8 Right related to automation

You are protected from automated decision-making processes.

11.9 Right to access, update or delete your personal information and obtain a copy of it

We respect your privacy rights and therefore you may contact us at any time and request:

1) to access, delete, change or update any Personal Information relating to you (for example, if you believe that your personal information is incorrect, you may ask to have it corrected or deleted); or

2) that we will cease any further use of your personal information (for example, you may ask that we will stop using or sharing your personal information with third parties) or that we shall remove or transfer your personal information (subject to any other legal obligation that may require us to keep the information).

Please note that unless you instruct us otherwise, we retain the information we collect for as long as needed to provide the services and to comply with our legal obligations, resolve disputes and enforce our agreements. We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion. If you wish to raise a complaint on how we have handled your personal information, please contact

us directly at info@alteneiji-group.com If you are not satisfied with our response or believe we are collecting or processing your personal information not in accordance with the laws, you can complain to the applicable data protection authority.

E-Advisors does not need to satisfy the Client's requests if E-Advisors is not sure of the Client's identity, the lawfulness of the request, or in case of the data transfer request when it is not possible to securely transmit data, or it may lead to infringement of the rights of other persons or entails E-Advisors' excessive administrative burden.

If some of the data processing is based on your clear consent, then you have the right to withdraw your consent at any time.

12. GOVERNING LAW, JURISDICTION AND SUBMITTING COMPLAINTS

12.1 This Privacy Policy and obligations arising from or related to it are governed by the legislation of the Republic of Estonia.

12.2 Any and all disputes arising from or related to the personal data protection will be settled by the parties by way of negotiations. Failing agreement, then you shall have the right to lodge a complaint with the supervisory authority Estonian Data Protection Inspectorate, Tatari 39, Tallinn, 10134, Estonia, (e-mail: info@aki.ee / phone: 627 4135) or a claim to court.

12.3 In case the dispute between the parties is to be resolved in judicial proceedings, the parties agree to refer the dispute to Harju County Court in accordance with the legislation in force in the Republic of Estonia.

12.4 The above mentioned does not exclude consumers from their rights regarding jurisdiction.

13. UPDATES TO THIS PRIVACY POLICY

13.1 Changes to this Privacy Policy will be made when required in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

13.2 You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.

13.3 If you have any questions about changes to this Privacy Policy, please contact info@alteneiji-group.com