

PRIVATE POLICY

Sardona Capital, S.A. (hereafter, "Sardona") is committed to maintaining the confidentiality, integrity and security of personal information of our current and prospective customers. We want you to understand how we collect and share that information. We understand that privacy is an important issue for you, and we also want you to understand how we protect your privacy when we collect personal information about you.

It is our policy not to release your personal information except as permitted by law, with your consent, as requested by you or set forth below. Within Sardona, we restrict access to your personal information to those who require it to provide products or services to you.

Facts	What does Sardona do with your personal information?
Why?	Financial companies choose how they share your personal information. The Law 81 of 2019 from the Republic of Panamá gives clients the right to limit some but not all sharing. The law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • your account agreements and other related documents and forms (for example, name, address, social security or tax number, birth date, investment experience, risk and investment profile and financial information) • transaction history • Information acquired to verify your identity and in due diligence process.
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Sardona chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Sardona share?	Can you limit this sharing?
For our everyday business purposes- such as to process your transactions, maintain your account(s), respond to court orders, to legal authorities and to comply with legal obligations.	Yes	No
For our marketing purposes- to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We do not share
For third parties to market to you	No	We do not share
Questions	(507) 388-3643 customerservice@sardona-capital.com	

Who we are	What does Sardona do with your personal information?
Who is providing this notice?	Sardona Capital, S.A. ("Sardona")
What we do	
How does Sardona protect your personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with law. These measures include computer safeguards and secured files.
How does Sardona collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • Open the account • Make deposits or transfers from your account • Direct us to buy securities • Direct us to sell your securities We also collect your personal information from others, such as compliance lists, or other authorized companies.

Definitions	What does Sardona do with your personal information?
Affiliates	Companies related by common ownership or control. They can be financial or non-financial.
Not affiliated	Companies not related by common ownership or control. These may be financial or non-financial companies. 1. Sardona does not share with unaffiliated persons.
Joint marketing	A formal agreement between unrelated financial companies that jointly market financial products or services to you. 1. Sardona does not engage in joint marketing.

Sardona's General Data Protection Policy

Privacy Notice

This Privacy Notice describes how Sardona Capital, S.A. collects and protects the personal data of individuals. Sardona's data collection and retention procedures are subject to Panamanian regulations, and your rights under this policy may be limited by those regulations.

Basis and purpose of data processing

Sardona collects and processes your personal data when processing is necessary for the execution of a brokerage account contract. We also process your personal data to comply with Law 81 of 2019 of the Republic of Panama.

Personal data obtained from external sources

Sardona obtains personal information about you from other sources to help us verify your identity and financial history.

Recipients of personal data

Sardona shares your personal data with external service providers to help us conduct our business. These agreements are subject to due diligence and oversight to ensure that these providers maintain strict confidentiality regarding your data. Sardona's providers may include:

- Auditing and accounting services;
- Statement providers;
- Trading platforms;
- Other providers as necessary.

Your rights under Personal Data Protection regulations

According to Article 15 of Law 81 of 2019, you have fundamental rights regarding your personal data and you can exercise those rights, subject to other laws or restrictions that Sardona must observe. These rights include:

- Access. You have the right to obtain free access to your personal data.
- Rectification. You have the right to request that incorrect or incomplete personal data be corrected.
- Cancellation. You have the right to request that personal data be deleted.
- Objection. You have the right to: (1) refuse to provide your personal data (2) object to the processing of your personal data (3) revoke your consent.
- Portability. You have the right to receive your personal data in a readable format and to transmit it to another data controller.

How Sardona uses your personal data

Business function	Type of data collected	Basis
Opening an investment account	<ul style="list-style-type: none"> • Contact information • Identity documents • Personal financial information • Personal information about financial objectives and risk tolerance 	<ul style="list-style-type: none"> • Execution of the stock brokerage contract. • Compliance with applicable laws and regulations
Process your transactions, including fund deposits, securities transactions, cash investments, and fund withdrawals.	<ul style="list-style-type: none"> • Contact information • Identity documents • Purpose of the transaction 	<ul style="list-style-type: none"> • Execution of the stock brokerage contract. • Compliance with applicable laws and regulations.

Provide you with information regarding your account, including, but not limited to: Limited to: account statements, balances, fees, transaction history, changes to your account agreement.	<ul style="list-style-type: none"> • Contact information 	<ul style="list-style-type: none"> • Execution of the stock brokerage contract. • Compliance with applicable laws and regulations. • Protecting your account from external threats. • Providing you with the necessary information to make informed decisions about your investments.
Use data analytics to monitor your account activity	<ul style="list-style-type: none"> • Trading history. 	<ul style="list-style-type: none"> • Performance of our contract with you. • Compliance with applicable laws and regulations. • Verify the legality of activities within the account. • Protect your account from external threats.
Make suggestions through our website, by email, or your statements regarding account security, important dates, or to communicate new products and services for you.	<ul style="list-style-type: none"> • Contact information • Identity documents • Personal financial information • Personal information about: Financial objectives and risk tolerance 	<ul style="list-style-type: none"> • Execution of the stock brokerage contract. • Compliance with applicable laws and regulations.

Information about cookies

Cookies are text files containing small amounts of information that your computer or mobile device downloads when you visit a website. Like most companies, Sardona uses cookies to help you navigate between pages and remember your preferences. If you visit the Sardona website, we use cookies to personalize your online experience, store your login credentials, and prevent and detect fraud.

When you visit our website from any device (mobile, tablet, or PC), we collect information about your use of the site, including information about the device and browser you use to access the site, how you interact with this site, and the IP address from which your device connects. You may not be able to initiate or complete certain activities within our secure online services unless these cookies or similar technologies are installed.