

# Cookie Policy

This Cookie Policy sets forth the manner in which ECM FUND MANAGEMENT LTD, a private limited liability company incorporated under the laws of the Republic of Cyprus with registration number HE 476804, with its registered office at Anastasiou G. Leventi 5A, 10th Floor, Office 1001, 1097 Nicosia, Cyprus, authorised and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number AIFM68/56/2013 as an Alternative Investment Fund Manager (“AIFM”), in accordance with the Alternative Investment Fund Managers Law of 2013 (L.56(I)/2013) and relevant European Union regulations, including Directive 2011/61/EU (the “AIFMD”) as amended from time to time (hereafter referred to as the **“Fund Manager” or the “Company”**), utilizes cookies and similar technologies on its website, accessible via [www.ecm-aifm.com](http://www.ecm-aifm.com). The Company is committed in protecting the privacy of its website visitors and ensuring full compliance with applicable data protection and electronic communications laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council (commonly known as the General Data Protection Regulation or “GDPR”).

## Purpose of This Policy

The purpose of this Cookie Policy is to provide you, as a user of the Company’s website, with clear and transparent information about the use of cookies and the means by which you can manage your preferences. The Company’s aim is to support informed consent, as required by data protection law, and to explain how cookies contribute to the functioning, performance, and personalization of Company’s online presence.

## What Are Cookies?

Cookies are small data files that are downloaded and stored on your device—whether it be a computer, smartphone, tablet, or other internet-enabled device—when you access and use a website. They are widely utilized to make websites operate more efficiently and effectively, to provide analytical insights to website operators, and to support personalization of content and advertising. Cookies may be set by the website you are visiting (known as “first-party cookies”) or by other domains (known as “third-party cookies”) if integrated services, such as analytics or social media plugins, are in use.

A cookie typically contains the name of the domain from which it originated, the duration of time it will remain on your device, and a unique identifier that distinguishes your browser or device from others.

## Categories of Cookies Used on This Website

The Company’s website uses several categories of cookies, each serving a distinct function that contributes either to the basic operation of the website or to the enhancement of your experience as a user.

Strictly necessary cookies are essential to the functionality of the Company’s website and are activated in response to actions taken by users, such as logging into secure areas or filling in forms. These cookies do not store any personally identifiable information and are required for the proper operation of the website; therefore, they do not require your consent.

Performance and analytical cookies enable the Company to collect aggregated and anonymized statistical data regarding visitors' interaction with the website. These cookies allow the Company to monitor key performance indicators such as the number of visits, the pages visited, session duration, and bounce rates. This information helps the Company understand how users navigate the website and informs decisions regarding improvements to the structure, content, and functionality of Company's services. Where the Company uses third-party analytical tools such as Google Analytics, the Company ensures that your IP address is anonymized and data sharing settings are appropriately configured to comply with the GDPR.

Functionality cookies are employed to provide enhanced user experience by remembering your preferences and choices, such as your selected language, region, or custom settings. These cookies facilitate a more personalized and seamless browsing experience without the need to reconfigure settings on each visit. Although these cookies are not strictly necessary, they significantly improve usability and user satisfaction.

### **Legal Basis for the Use of Cookies**

The legal basis for the use of strictly necessary cookies is in the Company's legitimate interest in ensuring the technical functionality and security of the Company's website. For all other types of cookies—including analytical, functional, and marketing cookies—the Company relies on your explicit consent, which is obtained through The Company's cookie consent management platform upon your first visit to the Website. You may withdraw or modify your consent at any time by accessing the cookie settings section of the Company's website.

### **Cookie Consent Mechanism**

When you first access the Company's website, you will be presented with a cookie consent banner that allows you to accept all cookies, reject non-essential cookies, or customize your preferences in a granular manner. This mechanism is designed to ensure that you are fully informed before any cookies, other than those strictly necessary, are placed on your device. The consent you provide is stored as proof of compliance and may be renewed or adjusted periodically in accordance with regulatory guidance.

### **Managing and Deleting Cookies**

You have full control over the use of cookies through your browser settings. Most modern browsers allow users to view the cookies stored on their device, delete them, block the acceptance of cookies entirely, or receive a notification before a new cookie is stored. However, disabling certain cookies—particularly those that are strictly necessary—may result in diminished functionality or restricted access to parts of the website. Instructions for managing cookies can be found in your browser's help or preferences menu.

### **Data Protection and Your Rights**

Some cookies may process information that constitutes personal data within the meaning of the GDPR. In such cases, your data will be processed in accordance with the principles set out in our Privacy Policy set out on the Fund Manager's website, including lawfulness, transparency, purpose limitation, and data minimization. As a data subject, you have the right to request access to your

personal data, to seek rectification or erasure of inaccurate or unlawfully processed data, to restrict or object to the processing of your personal data, and to lodge a complaint with the Office of the Commissioner for Personal Data Protection in Cyprus if you believe that your rights have been infringed.

### **Updates to This Cookie Policy**

The Company reserves the right to amend this Cookie Policy at any time in order to reflect changes in the use of cookies, modifications in legal or regulatory requirements, or improvements in Company's service offerings. Any changes will take effect as soon as they are posted on this page, accompanied by an updated "Last Updated" date. The Company recommends that you review this Policy periodically to stay informed about the Company's use of cookies and your rights in relation thereto.

### **Contact Information**

If you have any questions or concerns regarding this Cookie Policy or our broader data protection practices, you may contact the Company using the details below:

athos@ecm-aifm.com

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