

CCG PRIVACY NOTICE

At JSC Caucasus Capital Group ("CCG"), we understand that confidentiality and security of the personal information that you share with us is important. That is why we have developed specific policies and practices designed to protect the privacy of your personal information.

By opening an account with CCG or by utilizing the products and services available through CCG, you have consented to the collection and use of your personal information in accordance with the privacy notice set forth below. We encourage you to read this privacy notice carefully.

CCG does not sell customer lists or customer email addresses to third party marketers.

In order to provide brokerage services and to comply with regulatory requirements, CCG collects certain personal, nonpublic information from you. This includes information:

- Provided during the CCG account application process (e.g., your name, e-mail address, telephone number, birth date, social security number, investment objectives, etc.);
- Acquired as a result of the transactions you conduct through the CCG system;

We safeguard the confidentiality of your information in a number of ways. For example:

- We do not sell or license lists of our customers or the personal, nonpublic information that you provide to us.
- We restrict access to the personal, nonpublic information that you have shared with us to those CCG employees, agents and affiliates who need to know such information in connection with the services that CCG provides to you.
- We maintain strict employment policies that prohibit employees who have access to your personal, nonpublic information from using or disclosing such information except for business purposes.
- We take substantial precautions to safeguard your personal, nonpublic information. For example, the CCG system can be accessed only by authorized CCG personnel via valid user names and passwords. In addition, our Internet-based systems include security measures such as encryption and firewalls.

We do not disclose personal, nonpublic information to individuals or entities that are not affiliated with CCG, except as provided by law. For example, among other reasons, we may disclose or report such information: where necessary to authorize, effect, administer or enforce transactions that you request or authorize; to maintain and administer your account; to provide you with account confirmations, statements and records; to maintain appropriate archival records; where we believe that disclosure is required by applicable law, rules or regulations; to cooperate with law enforcement, regulatory or self-regulatory organizations; to enforce our customer and other agreements; to meet our obligations; or to protect our rights and property. As long as consistent with applicable securities laws and regulations, we may share anonymized account information or anonymized delayed order information with third parties (and/or share such information among our affiliates) for the purpose of analysis, research, market data compilation, product creation, establishing order routing and execution relationships, or for any other lawful purpose.

If you have any questions about these policies, please contact CCG Customer Service through the CCG website at the Customer Service Contact Page.