

Legal Notice

1. Website Operator

Company Name: SIA Ascend Finance

Registration number: 40203644556

Registered Address: Dzirnavu iela 67, Riga, LV-1011, Latvia

Contact Email: legal@ascend-finance.capital

2. Liability Disclaimer

The content on this website is provided for general informational purposes. While we strive to ensure accuracy, we cannot guarantee that all information is error-free or up to date. To the fullest extent permitted by Latvian law, the Company disclaims liability for any damages resulting from the use (or inability to use) the website or reliance on any content provided here.

3. Intellectual Property

All text, graphics, logos, and trademarks displayed on this website are the property of SIA Ascend Finance or its licensors and may not be reproduced or used without prior written permission.

4. Supervisory Authority

SIA Ascend Finance is an authorized crowdfunding service provider under Regulation (EU) 2020/1503 supervised by the Bank of Latvia (*Latvijas Banka*) K. Valdemāra 2A, Rīgā, LV-1050, Latvia.

Privacy Policy

This Privacy Policy explains how **Ascend Finance SIA** processes your personal data when you visit our website, contact us, apply for a job. It provides information on what data we process, how we process it, and the rights you have under applicable data protection laws such as the General Data Protection Regulation (GDPR).

A. General Information on the Handling of Personal Data

This section provides general information on how we process personal data. Details for specific scenarios are outlined in subsequent sections.

1. Controller

The controller for the processing of your personal data within the meaning of the General Data Protection Regulation (GDPR) is

Ascend Finance SIA
Dzirnavu iela 67, Riga, LV-1011, Latvija
legal@ascend-finance.capital

2. Cooperation with Third Parties / Data Recipients

In some cases, we use external service providers and partners to process your data, such as for the hosting of our website. We carefully select them before working with them. The partners are either bound by our instructions within the scope of data processing on our behalf as the data controller, or have made other agreements with us regarding data protection, for example because we process the data as joint controllers. We also work with partners who are professionally bound to confidentiality, such as tax advisors, lawyers and other service providers. You can find more detailed information about the service providers we use in the respective processing activity below.

Within our company, only those persons have access to your personal data who need it for the purposes stated in each case.

3. Data Transfers to Third Countries

We use some services whose providers are located in third countries (outside the European Union or the European Economic Area) or process personal data there, i.e. countries where the level of data protection does not correspond to that of the European Union. Where this is the case and the European Commission has not issued an adequacy decision (Art. 45 GDPR) for these countries, we have taken appropriate measures to ensure an adequate level of data protection for any data transfers. These include but are not limited to the standard contractual clauses of the European Union.

Where this is not possible, we base the transfer of data on the derogations under Art. 49 GDPR, in particular your explicit consent or the necessity of the transfer for the performance of the contract or for taking steps prior to entering into a contract.

Where a data transfer to a third country is planned and no adequacy decision or appropriate safeguards are in place, it is possible and there is a risk that authorities in the relevant third country (e.g., intelligence agencies) may gain access to the transferred data in order to record and analyze it, and that enforceability of your rights as a data subject cannot be guaranteed.

4. Storage Period

In principle, we only store personal data for as long as necessary to fulfil the purposes for which we have collected the data. We then erase the data without undue delay, unless we still require the data until the end of the statutory limitation period for documentation purposes for claims under civil law or due to statutory retention obligations.

For documentation purposes, we are required to keep contract data for another six years after the end of the year in which the business relationship with you ends. After the standard statutory period of limitation, any claims become statute-barred at this point in time at the earliest.

Even after that, we are still required to store some of your data for accounting reasons. We are required to do so because of statutory documentation requirements. Where applicable, we will inform you of the length of time for which the data will be stored in the following sections relating to individual processing.

5. Your Rights as a Data Subject when Data is Processed

You have the following rights as a data subject:

- Right to withdraw consent
- Right to object to the processing of your personal data (Art. 21 GDPR)
- Right of access to personal data concerning you which we process (Art. 15 GDPR)
- Right to rectification of inaccurate personal data concerning you which we have stored (Art. 16 GDPR)
- Right to erasure of your personal data (Art. 17 GDPR)
- Right to restriction of the processing of your personal data (Art. 18 GDPR)
- Right to data portability (Art. 20 GDPR)
- Right to lodge a complaint with a supervisory authority (Art. 77 GDPR)

In order to establish your rights described here, you can contact us at any time using the contact details provided. This also applies if you wish to receive copies of safeguards in order to prove an adequate level of data protection. Subject to the respective legal requirements, we will comply with your data protection request.

We will keep your inquiries regarding the establishment of rights under data protection law, and our responses to these, for a period of up to three years for documentation purposes and, where necessary in individual cases, beyond this period if we need to establish, exercise or defend legal claims. The legal basis is Art. 6(1) Sentence 1(f) GDPR, based on our interest in defending ourselves against any civil-law claims under Art. 82 GDPR, avoiding administrative fines under Art. 83 GDPR and fulfilling our accountability under Art. 5 Sentence 2 GDPR.

You have the right to withdraw the consent you gave us at any time. As a result of this, we will cease the data processing based on this consent with future effect. This withdrawal

of your consent will not affect the lawfulness of the processing carried out on the basis of the consent prior to the withdrawal.

Insofar as we process your data on the basis of legitimate interests, you have the right to object to the processing of your data at any time for reasons arising from your particular situation. If your objection is to data processing for direct marketing purposes, you have a general right of objection, which we will implement without requiring you to give reasons.

If you would like to make use of your right of withdrawal or objection, it is sufficient to simply notify us using the contact details provided above.

Finally, you have the right to lodge a complaint with a data protection supervisory authority. You can assert this right, for example, by contacting a supervisory authority in the Member State of your habitual residence, your place of work or the place of the alleged infringement.

6. Automated Decision-Making

We do not use automated decision-making or profiling.

7. Data security and security measures

We undertake to treat your personal data confidentially. In order to prevent manipulation, loss or misuse of your data stored by us, we take extensive technical and organizational security precautions, which are regularly reviewed and adapted to technological progress.

However, we would like to point out that due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions outside our area of responsibility. In particular, unencrypted data - e.g. when sent by e-mail - may be read by third parties. We have no technical influence on this. It is your responsibility as a user to protect the data you provide against misuse by means of encryption or in any other way.

8. Provision of Personal Data

As a visitor to our website, you are generally not obligated to provide personal data. However, certain functionalities of our services may rely on the collection of data (e.g., connection data for displaying the site correctly or processing requests via contact forms). If you choose not to provide this information, it may limit or impair your ability to fully use certain features of the website or Platform.

B. Provision of the website

1. Essential Information

Every time you use our website, your browser automatically collects and transmits connection data to enable you to visit the site. This connection data comprises what is known as HTTP header information, including the user agent, and includes in particular:

- IP address of the requesting device
- Method (e.g., GET, POST), date and time of the request
- Address of the requested website and path of the requested file
- The previously visited website/file (HTTP referrer)
- Information about the browser used and the operating system
- Version of the HTTP protocol, HTTP status code, size of the file delivered
- Request information such as language, type of content, coding of content, character sets.

It is absolutely necessary to process this connection data to make it possible to visit the website, to guarantee the long-term functionality and security of our systems, and for the general administrative maintenance of our site.

The legal basis for the processing of data is Art. 6(1) Sentence 1(f) GDPR.

The data will be erased as soon as it is no longer required for achieving the purpose of its collection. In the case of recording the data to provide the website, this is the case when the respective session has ended.

2. Hosting with AWS and CDN CloudFront

We host our website with Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, 1855 Luxembourg ("AWS"). When you visit our site, your personal data is processed on AWS servers. Personal data may also be transferred to the parent company of AWS in the USA. The transfer of data to the USA is based on the adequacy decision of the European Commission for the USA (Amazon.com, Inc. is certified according to the EU-US-DPF) and the EU standard contractual clauses. You can find details [here](#) in the AWS Data Processing Addendum.

We also use AWS's CloudFront content delivery network ("CDN") on our site. A CDN is an online service used primarily to deliver large media files (such as graphics, page content or scripts) through a network of regionally distributed servers connected over the Internet. It makes duplicates of a site's data available on multiple AWS servers around the world. These servers, which are located in non-EU countries, are only accessed if the site is accessed from a network in a non-EU country. This means that if the site is accessed from Latvia or the EU, the site is loaded from servers in Latvia / the EU. Only if the site is

visited from outside the EU, will the content be served from the nearest server outside the EU. Some of the images and files embedded in this site are then loaded from the CloudFront CDN when the page is requested. Through this request, information about your use of our website (such as your IP address) is transferred to and stored on AWS servers in other EU countries. This happens the moment you enter our website.

The use of AWS and the CloudFront CDN is in the interest of increased website reliability, increased protection against data loss, and improved loading speed of this site. This constitutes a legitimate interest within the meaning of Art. 6(1) Sentence 1(f) GDPR.

The data will be erased after it is no longer needed to provide the website or comply with legal requirements.

To learn more about AWS's privacy practices, please visit: <https://aws.amazon.com/de/compliance/gdpr-center/>

3. Data Processing when You Contact Us

There are several ways to contact us – by e-mail or mail.

The data collected here – depending on the type of contact you have chosen, this may include your e-mail address, first and last name, telephone numbers, date and time of your inquiry, your request and, if applicable, contractual data if you send us inquiries as part of a contract or contract processing – is used solely for the purpose of communicating with you.

As a rule, we base the processing of your data on Art. 6(1) Sentence 1(f) GDPR. We have a legitimate interest in responding effectively to requests for information and, where applicable, in establishing or maintaining business relationships. If the purpose of the contact is the conclusion of a contract or if the contact is made in connection with a contract to which you are a party, the legal basis for the processing of personal data is Art. 6(1) Sentence 1(b) GDPR.

If your data is no longer required for the processing and handling of your inquiry because your request has been dealt with, your request has been clarified and there are no legal retention periods or a justified interest in the continued storage, we will routinely erase your data.

C. Cookie Policy

1. Introduction

This Cookie Policy explains how we use cookies and other technologies such as web storage and JavaScript on this website.

2. Used technologies

Our website uses various tools that are offered either by us or by third parties. These include, in particular, tools that use technologies to store information in the end device or to access it (cookies, web storage, JavaScript). In the following, we will inform you about the tools we use, in particular about how the tools work, the providers, the transfer of data to third parties and any data transfers to third countries.

3. Legal Basis

We use the tools necessary for Website operation on the basis of our legitimate interest in accordance with Art. 6 para. 1 lit. f GDPR to provide the basic functions of our Websites. In certain cases, these tools may also be necessary for the performance of a contract or in order to take steps prior to entering into a contract, in which case the processing is carried out in accordance with Art. 6 para. 1 lit. b GDPR. Access to and storage of information in the end device is absolutely necessary in these cases and takes place on the basis of the implementation laws of the ePrivacy Directive of the EU member states.

We don't use other nonessential (optional) Tools.

If personal data is transferred to third countries, and the European Commission has not issued an adequacy decision (Art. 45 GDPR) for these countries, we have taken appropriate measures to ensure an adequate level of data protection for any data transfers. These include but are not limited to the standard contractual clauses of the European Union.

Where this is not possible, we base the transfer of data on the derogations under Art. 49 GDPR, in particular your explicit consent or the necessity of the transfer for the performance of the contract or for taking steps prior to entering into a contract.

D. Changes to this Privacy and Cookie Policy

We may update this Privacy and Cookie Policy from time to time to reflect changes in our practices or for other operational, legal, or regulatory reasons. We encourage you to review this Privacy and Cookie Policy periodically to stay informed about how we use cookies.

Last amended: July 2025.