

Business Privacy Policy

Preamble

This privacy policy has been updated to be compliant with the new General Data Protection Regulation (GDPR) which is effective in the UK from 25th May 2018.

It sets out how Ferghana Partners, Inc. and/or its affiliates, including Ferghana Securities, Inc. and Ferghana Partners, LLP (hereinafter “Ferghana”) uses and protects any personal information that you give Ferghana, whether it be during meetings, discussions, at conferences, via email exchanges or when you use the Ferghana website.

Unless otherwise agreed with you, we will only collect basic personal data about you, which does not include any special categories of personal information about you (often known as 'sensitive personal data').

Ferghana may change this policy from time to time by updating this page. You should check this page from time to time to ensure that any changes are acceptable with you. This policy is effective from 25th May 2018.

What we collect

We may collect the following information:

- Name and job title.
- Contact information including email address, phone numbers and address and postcode.
- Business preferences and interests.
- Other information relevant to customer diligence checks for FINRA and FCA compliance purposes.

The Ferghana website does not use Google Analytics, a web analysis service provided by Google. Inc. (“Google”). Therefore our website does not collect any data regarding your visit.

Why we need it

We require this information to understand your business needs and provide you with the advisory and consultancy services you are interested in or have engaged us to provide, and to assert our right to be recompensed in return for those services, as per the services agreement or contract we have with you.

In particular, we may use the information for the following reasons:

- Internal record keeping.
- We may use the information to target our products and services.
- We may use your information to contact you regarding current business transaction opportunities. We may contact you by email, phone, fax or mail.
- We may periodically send promotional emails about recent transactions that we have successfully closed using the email address which you have provided.

- We may use the information to customise our website and corporate promotional materials.

If you do not provide this information then we will be unable to provide such services. We will only collect such personal data from you that is necessary for us to conduct our business interests.

Regarding promotional emails, please note that you will receive these emails only because you have shown to have a legitimate interest in Ferghana in the past. You also have the right to withdraw your consent to receiving such promotional materials via phone or email.

What we do with it

All the personal data we hold about you will be processed by our staff in the United Kingdom and United States and no third parties will have access to your personal data unless there is a legal obligation for us to provide them with this. Please be aware, however, that your information may be stored on a cloud-based system whose servers are located within the European Union and United States.

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so.

How long we keep it

We will generally keep your personal data for a minimum of 6 years, after which time it will be destroyed if it is no longer required for the purpose(s) for which it was obtained. If you consent to marketing, any information we use for this purpose will be kept with us until you notify us that you no longer wish to receive this information. More information on our retention schedule can be found on our website.

What are your rights?

Under data protection legislation, you have several rights regarding the use of your personal data, as follows:

- If at any point you wish to either confirm whether your personal data is being processed and/or access the data we hold on you, you can request to see this information, usually free of charge, and we will respond to this request within a month.
- You also have the right for certain data you have provided Ferghana to be provided to you in a structured and commonly used electronic format (for example, a Microsoft Word or Excel file), so that you can move, copy or transfer this data easily to another data controller. You may also request the transmission of such data directly to another organisation where it is practical for us to do so.
- You are entitled to have data corrected if it is inaccurate or incomplete.

- You are entitled to have data deleted if it is no longer needed or there is no longer a legitimate reason for the processing, or if the data in question has otherwise unlawfully been processed. You may also request deletion of your personal data if it was only being processed as a result of you consenting to this and you now withdraw your consent.
- You have the right to object to the processing of your personal data (note that this only provides you with the right to raise your objections, not a blanket right to have any and all processing cease).
- You have the right to restrict the processing of your personal data under certain circumstances, including if you have contested its accuracy and while this is being verified by Ferghana, or if you have objected to its processing and while Ferghana is considering whether it has legitimate grounds to continue to do so.

How to complain about the use of your data

If you wish to raise a complaint about how we have handled your personal data, including in relation to any of the rights outlined above, you can contact info@ferghanapartners.com.

If you are not satisfied with our response, or believe we are processing your data unfairly or unlawfully, you can complain to either Information Commissioner's Office (ICO) in the UK, or US Federal Trade Commission (FTC) in the USA, whichever is relevant to you.

You can find further information about the ICO and their complaints procedure here: <https://ico.org.uk/concerns/>

You can find further information about the US Federal Trade Commission (FTC) and their complaints procedure here: <https://www.ftccomplaintassistant.gov>