

COOKIE POLICY

Effective Date: November 2025

I. INTRODUCTION AND SCOPE

This Cookie Policy describes how Goldfish Capital Ltd., a private company incorporated and registered in Malta under company registration number C 113639, with its registered office at Skyway Offices, Office 4, Blk C 179, Triq Marina, Pietà, PTA 9042, Malta ("Goldfish Capital", the "Company", "we", "us", or "our"), uses cookies, web beacons, pixels, and similar tracking technologies on the website located at www.goldfishcapital.mt (the "Website").

Goldfish Capital Ltd. is a private investment and holding company that conducts activities exclusively for its own account and benefit. The Website is maintained solely for general corporate and informational purposes. The Company does not provide investment advisory, brokerage, or other financial services to the public and does not solicit or accept funds from external investors or clients.

We are committed to transparency regarding our use of cookies and similar technologies and the processing of any technical data that may be collected when you access or browse the Website. This Cookie Policy forms an integral part of, and should be read in conjunction with, our Privacy Policy and Terms of Service, which are available on the Website and incorporated herein by reference.

By continuing to use the Website after being presented with our cookie notice, or by adjusting your cookie preferences through our consent management tool, you acknowledge that you have read and understood this Cookie Policy.

2. DEFINITIONS AND TECHNICAL EXPLANATION

For the purposes of this Cookie Policy, "cookies" refers to small text files that are placed on your device (including computers, tablets, smartphones, and other internet-enabled devices) when you visit a website. Cookies are stored by your web browser and allow the website or a third party to recognise your device and retain certain information about your visit or preferences.

In addition to cookies, we may use similar technologies such as web beacons (also known as pixel tags or clear GIFs), which are small, transparent image files embedded in web pages or emails that allow us to track whether a page has been viewed or an email has been opened; local storage objects, which function similarly to cookies but may store larger amounts of data locally on your device; and device fingerprinting techniques, which collect information about your device configuration to distinguish it from other devices, though we minimise the use of such techniques and rely on them only where strictly necessary for security purposes.

Cookies and similar technologies serve various functions. They enable core website functionality such as navigation and secure access. They allow the website to remember user preferences and settings. They collect aggregated statistical information about how visitors use the website. They help maintain the security and integrity of the website. Cookies do not typically contain information that directly identifies you as an individual; however, they may collect technical and usage data that, when combined with other information, could be associated with an identifiable person.

3. CATEGORIES OF COOKIES USED

The cookies deployed on our Website fall into the following categories based on their function and purpose.

Strictly Necessary Cookies. These cookies are essential for the basic operation, security, and functionality of the Website. They enable core functions such as page navigation, access to secure areas, session management, and load balancing. Without these cookies, the Website cannot function properly, and certain services you request cannot be provided. Strictly necessary cookies are deployed automatically and do not require your prior consent under applicable law. The legal basis for processing data through strictly necessary cookies is our legitimate interest in ensuring the proper functioning, security, and operational integrity of the Website, as well as the necessity of processing for the performance of a contract or to take steps at your request prior to entering into a contract.

Preference and Functionality Cookies. These cookies enable the Website to remember choices you have made, such as your preferred language, region, display settings, or other customisable elements, and to provide enhanced and more personalised features. The information collected by these cookies may be anonymised and cannot track your browsing activity on other websites. Where these cookies are non-essential, we will seek your consent before deploying them.

Analytical and Performance Cookies. Where implemented, these cookies collect aggregated information about how visitors interact with the Website, including the number of visitors, the pages most frequently visited, the approximate time spent on each page, and the sources from which visitors arrive at the Website. The data collected is used solely to analyse and improve the performance, structure, usability, and content of the Website. We do not use analytical cookies to build individual user profiles or to track your activity across third-party websites. Where such cookies are classified as non-essential under applicable law, we will obtain your consent before their deployment.

Security Cookies. These cookies are used to support security features, detect fraudulent or malicious activity, and protect both the Website and its users from unauthorised access or cyberattacks. Security cookies may

also assist in verifying the authenticity of user sessions and preventing cross-site request forgery.

We expressly confirm that we do not use cookies for behavioural advertising, marketing profiling, retargeting, or for offering, promoting, or soliciting any financial products, investment services, or other regulated activities to users of the Website.

4. COOKIE DURATION AND CLASSIFICATION

Cookies used on the Website may be classified according to their duration as follows.

Session cookies are temporary cookies that exist only for the duration of your browsing session. They are stored in your device's temporary memory and are automatically deleted when you close your web browser. Session cookies are typically used to maintain session state, enable navigation between pages, and support essential website functions during a single visit.

Persistent cookies remain stored on your device for a predetermined period or until you manually delete them. Persistent cookies are used to remember your preferences and settings across multiple visits, to provide analytical data over time, and to support functionality that requires recognition of returning visitors. The retention period for persistent cookies varies depending on their purpose and may range from several days to up to twenty-four months. Specific retention periods for each category of cookie are set forth in the cookie schedule available through our consent management tool.

Cookies may also be classified according to their origin. First-party cookies are set directly by Goldfish Capital Ltd. (or by service providers acting strictly on our behalf and under our instructions) through the Website domain. Third-party cookies are set by external service providers, such as

analytics platforms or security tools, that assist us in operating, securing, and improving the Website. Any third-party cookies are deployed only with carefully vetted providers that have demonstrated appropriate compliance with applicable data protection laws.

5. SPECIFIC COOKIES AND THIRD-PARTY PROVIDERS

A detailed schedule of the specific cookies used on the Website, including their names, purposes, categories, durations, and the identity of any third-party providers, may be presented to you through the cookie consent banner or preference centre displayed when you first access the Website. This schedule is updated periodically to reflect any changes in the cookies we deploy.

Where we engage third-party service providers that set cookies on the Website, such providers may include analytics services that provide aggregated statistical information about website traffic and usage patterns, security and fraud prevention services that help protect the Website from malicious activity, and hosting and infrastructure providers that support the technical operation of the Website.

These third-party providers may process limited technical and usage data relating to your visit, including anonymised or truncated IP address information, device type, operating system, browser type and version, screen resolution, pages visited, referring URLs, and timestamps of access. Any such processing is carried out in accordance with the respective third party's privacy policy and cookie policy, and we take reasonable steps to ensure that all third-party providers we engage offer appropriate guarantees of compliance with the General Data Protection Regulation and other applicable data protection legislation.

We do not authorise or permit any third party to use cookies on our Website for the purposes of targeted advertising, behavioural profiling,

cross-site tracking, or offering investment products, financial services, or any other regulated products or services to you.

6. LEGAL BASIS FOR PROCESSING

The processing of data through cookies and similar technologies is carried out in accordance with Regulation (EU) 2016/679 (the General Data Protection Regulation, or "GDPR"), Directive 2002/58/EC (the ePrivacy Directive) as transposed into Maltese law, and the Data Protection Act (Cap. 586 of the Laws of Malta).

For strictly necessary cookies, the legal basis for processing is our legitimate interest in ensuring the proper operation, security, and technical functionality of the Website, as well as, where applicable, the necessity of processing for the performance of a contract or compliance with a legal obligation to which we are subject. Strictly necessary cookies do not require your prior consent.

For non-essential cookies, including certain preference, functionality, and analytical cookies, the legal basis for processing is your consent, which we obtain through the cookie consent banner or preference management tool presented when you first access the Website. You have the right to grant, refuse, or withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal.

7. YOUR CHOICES AND HOW TO MANAGE COOKIES

You have several options for managing, restricting, or disabling cookies on our Website.

Consent Management Tool. When you first visit the Website, you will be presented with a cookie consent banner that allows you to accept all cookies, reject non-essential cookies, or customise your preferences by

category. You may revisit and modify your cookie preferences at any time by accessing the cookie settings link typically located in the footer of the Website or by clearing your browser cookies and revisiting the Website.

Browser Settings. Most modern web browsers allow you to control cookies through their settings or preferences menus. You can typically configure your browser to block all cookies or only third-party cookies, to delete existing cookies, to notify you before a cookie is placed on your device, or to browse in "private" or "incognito" mode, which limits the storage of cookies and other browsing data. The specific procedures for managing cookies vary depending on the browser you use. Detailed instructions are available through the help or support documentation provided by your browser vendor.

Opt-Out Mechanisms. Certain third-party analytics providers offer their own opt-out mechanisms. For example, if we use Google Analytics, you may install the Google Analytics Opt-Out Browser Add-on to prevent your data from being collected by Google Analytics. Information about such opt-out tools is typically available on the respective provider's website.

Please be aware that if you choose to block, disable, or delete certain cookies, particularly strictly necessary cookies, some features of the Website may not function correctly, certain pages may not load properly, and your user experience may be degraded. Blocking cookies does not prevent all data collection; other technical information may still be transmitted to our servers in the course of normal website operation.

8. DO NOT TRACK SIGNALS

Some web browsers incorporate a "Do Not Track" (DNT) feature that transmits a signal to websites indicating that you do not wish to be tracked. There is currently no universally accepted standard for how websites should respond to DNT signals, and regulatory guidance on this matter remains limited. At present, our Website does not respond to or

alter its behaviour based on DNT signals transmitted by your browser. We will continue to monitor developments in this area and may update our practices if a clear standard emerges. Regardless of DNT settings, we do not engage in cross-site tracking or behavioural advertising on this Website.

9. INTERNATIONAL DATA TRANSFERS

In certain circumstances, data collected through cookies may be transferred to, stored in, or processed in countries outside the European Economic Area (EEA). Where any such transfer occurs, we ensure that appropriate safeguards are in place in accordance with the GDPR, including reliance on adequacy decisions issued by the European Commission, the implementation of Standard Contractual Clauses approved by the European Commission, or other lawful transfer mechanisms. Further information about international data transfers is available in our Privacy Policy.

10. DATA RETENTION

Data collected through cookies is retained only for as long as necessary to fulfil the purposes described in this Cookie Policy or as required by applicable law. Session cookies are deleted automatically when you close your browser. Persistent cookies are retained for the periods specified in the cookie schedule available through our consent management tool, after which they expire and are automatically deleted. Aggregated analytical data that does not identify individuals may be retained for longer periods for statistical and trend analysis purposes.

11. YOUR DATA PROTECTION RIGHTS

To the extent that any data collected through cookies constitutes personal data and we are able to identify you, you may exercise the rights afforded to you under the GDPR and applicable Maltese data protection law. These rights include the right to access your personal data and obtain information about how it is processed, the right to rectification of inaccurate or incomplete personal data, the right to erasure of your personal data in certain circumstances, the right to restrict processing in certain circumstances, the right to data portability where technically feasible and applicable, the right to object to processing based on legitimate interests, and the right to withdraw consent at any time where processing is based on consent.

To exercise any of these rights, or if you have questions or concerns about our use of cookies, please contact us using the details provided in Section 14 below. You also have the right to lodge a complaint with the Information and Data Protection Commissioner in Malta or with the supervisory authority in your country of residence.

12. CHILDREN'S PRIVACY

The Website is not directed at, and is not intended for use by, children under the age of eighteen (18) years or such higher age as may constitute the age of majority in your jurisdiction. We do not knowingly collect personal data from children through cookies or otherwise. If you believe that a child has provided us with personal data, please contact us immediately using the details provided below, and we will take steps to delete such data.

13. UPDATES TO THIS COOKIE POLICY

We may update this Cookie Policy from time to time to reflect changes in the cookies and similar technologies we use, changes in applicable legal or regulatory requirements, updates to our third-party service providers, or changes in our internal practices and policies. When we make material changes to this Cookie Policy, we will update the "Effective Date" at the top of this document and publish the revised version on the Website. Where required by applicable law, we may notify you of material changes through a prominent notice on the Website or by other appropriate means, and we may seek your renewed consent for certain categories of cookies.

Your continued use of the Website following the posting of any changes constitutes your acceptance of the revised Cookie Policy. We encourage you to review this Cookie Policy periodically to stay informed about how we use cookies.

14. CONTACT INFORMATION

If you have any questions, comments, or concerns regarding this Cookie Policy, the cookies we use, your cookie preferences, or the exercise of your data protection rights, please contact us at:

Goldfish Capital Ltd. Skyway Offices, Office 4, Blk C 179 Triq Marina, Pietà,
PTA 9042 Malta

Email: info@goldfishcapital.mt

For matters relating to data protection, you may also contact our designated data protection contact at the address above or by email at the address provided.