

PRIVACY POLICY

Last Updated: November 2025

I. INTRODUCTION AND SCOPE

Goldfish Capital Ltd. is committed to protecting and respecting your privacy. This Privacy Policy ("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"), collects, uses, discloses, stores, and otherwise processes personal data in connection with your access to and use of 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, portfolio management, or any other financial services to the public and does not solicit, accept, or manage funds from external investors, clients, or any third parties through the Website or otherwise.

For the purposes of 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), Goldfish Capital Ltd. acts as the data controller in relation to the personal data processed via the Website. As data controller, we determine the purposes and means of processing personal data and bear responsibility for ensuring that such processing is carried out in compliance with applicable data protection laws.

This Policy forms an integral part of, and should be read in conjunction with, our Terms of Service and Cookie Policy, each of which is available on the Website and incorporated herein by reference. In the event of any conflict between this Policy and those documents with respect to matters of data protection, this Policy shall prevail.

2. DATA PROTECTION OFFICER AND CONTACT INFORMATION

For all questions, comments, concerns, or requests relating to this Policy, our data processing practices, 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

Given the nature and scale of our data processing activities, the Company has not appointed a dedicated Data Protection Officer. However, we have designated an internal contact responsible for data protection matters who can be reached at the address and email provided above.

3. DATA PROTECTION PRINCIPLES

We process personal data in accordance with the following principles enshrined in Article 5 of the GDPR. Personal data is processed lawfully, fairly, and in a transparent manner in relation to the data subject. Personal data is collected for specified, explicit, and legitimate purposes and is not further processed in a manner incompatible with those purposes. Personal data is adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed. Personal data is accurate and, where necessary, kept up to date, with reasonable steps taken to ensure that inaccurate data is erased or rectified without delay. Personal data is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which it is processed. Personal data is processed using appropriate technical and organisational measures to ensure its security, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

We are committed to demonstrating compliance with these principles and to maintaining appropriate records of our processing activities as required by applicable law.

4. CATEGORIES OF PERSONAL DATA WE COLLECT

We collect and process only such personal data as is necessary for specified and lawful purposes, in accordance with the principles of data minimisation and proportionality. The categories of personal data we may collect depend on how you interact with the Website and include the following.

Information You Provide Voluntarily. When you contact us or otherwise communicate with us via the Website, email, telephone, or other channels, you may voluntarily provide us with certain personal data. This may include identification and contact information such as your name, job title or position, company or organisation name, business address, email address, telephone number, and country of residence. This may also include communication content, comprising the substance of your message, questions, comments, inquiries, or any other information you choose to include in your correspondence with us. We request that you exercise discretion in the information you provide and refrain from including any sensitive, confidential, or unnecessary personal information in your communications, particularly special categories of personal data as described in Section 9 of this Policy.

Information Collected Automatically. When you access or browse the Website, certain technical and usage data may be collected automatically through cookies, server logs, and similar technologies. This automatically collected data may include your Internet Protocol (IP) address, which may be truncated, anonymised, or pseudonymised where appropriate. It may include technical information about your device, such as device type, unique device identifiers, operating system type and version, browser type and version, screen resolution, and language settings. It may include usage data such as the date and time of your access, the pages you view, the time spent on each page, the sequence of pages visited, and the uniform resource locator (URL) of the website from which you navigated to our Website (referring URL). It may also include general geographic location information derived from your IP address, such as country or region, but not precise geolocation data.

Such information is collected through cookies and similar tracking technologies, web server logs, and security and fraud prevention tools. For comprehensive information about the cookies and similar technologies we use, their purposes, and your choices regarding them, please refer to our Cookie Policy.

Information from Third-Party Sources. In limited circumstances, we may receive personal data about you from third-party sources, such as publicly available databases, professional networking platforms, or business partners. Any such data is processed in accordance with this Policy and applicable data protection laws.

5. PURPOSES OF PROCESSING AND LEGAL BASES

We process your personal data only where we have a valid legal basis under the GDPR and only for the purposes described in this Policy. The specific purposes for which we process personal data and the corresponding legal bases are set forth below.

Responding to Inquiries and Managing Communications. We process your contact details and the content of your communications to respond to inquiries, requests, or questions you submit via the Website, email, or other communication channels, to engage in correspondence relating to potential corporate matters or business relationships, and to maintain records of our communications for quality assurance, training, and dispute resolution purposes. The legal bases for this processing are our legitimate interests in responding to inquiries, managing corporate communications, and maintaining business relationships pursuant to Article 6(1)(f) of the GDPR, as well as, where applicable, the necessity of processing for the performance of a contract to which you are a party or for taking steps at your request prior to entering into a contract pursuant to Article 6(1)(b) of the GDPR.

Operating, Securing, and Improving the Website. We process technical and usage data to ensure the proper functioning, availability, and technical integrity of the Website, to monitor, detect, and prevent fraud, abuse,

security incidents, and cyberattacks, to diagnose and resolve technical problems and errors, to generate aggregated, anonymised, or pseudonymised statistics to understand how visitors use the Website, and to analyse and improve the structure, navigation, content, and user experience of the Website. The legal basis for this processing is our legitimate interests in operating a secure, reliable, stable, and user-friendly corporate Website pursuant to Article 6(1)(f) of the GDPR. Where non-essential cookies are used for analytics or preference purposes, the legal basis is your consent pursuant to Article 6(1)(a) of the GDPR, which is obtained through our cookie consent mechanism as described in our Cookie Policy.

Complying with Legal and Regulatory Obligations. We may process your personal data where necessary to comply with applicable laws, regulations, directives, and regulatory requirements to which the Company is subject, to respond to lawful requests, subpoenas, court orders, or other legal process from competent authorities, and to establish, exercise, or defend legal claims or protect our rights, property, or safety or those of our stakeholders. The legal bases for this processing are compliance with a legal obligation to which we are subject pursuant to Article 6(1)(c) of the GDPR and our legitimate interests in establishing, exercising, or defending legal claims and protecting our rights pursuant to Article 6(1)(f) of the GDPR.

Protecting Vital Interests. In exceptional circumstances, we may process personal data where necessary to protect the vital interests of you or another natural person, for example in situations involving imminent threats to life or health. The legal basis for this processing is the protection of vital interests pursuant to Article 6(1)(d) of the GDPR.

We expressly confirm that we do not use the Website to solicit, accept, or manage client funds, to provide financial services to the public, or to engage in marketing, advertising, or promotional activities directed at external parties.

6. AUTOMATED DECISION-MAKING AND PROFILING

We do not engage in automated decision-making, including profiling, that produces legal effects concerning you or similarly significantly affects you within the meaning of Article 22 of the GDPR. We do not use personal data collected via the Website to build individual profiles for behavioural advertising, credit scoring, or similar purposes. Any analytical processing we undertake is limited to generating aggregated and anonymised statistics about Website usage and does not involve decisions or assessments relating to identifiable individuals.

7. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies, web beacons, pixels, and similar tracking technologies to operate and secure the Website, to remember your preferences, and, where you have provided consent, to collect limited analytical information about how the Website is used.

Detailed information about the categories of cookies we use, their specific purposes, retention periods, first-party and third-party distinctions, and your options for managing, disabling, or deleting cookies is set forth in our Cookie Policy, which constitutes an integral and binding part of this Privacy Policy. By continuing to use the Website after being presented with our cookie consent mechanism, or by adjusting your cookie preferences, you acknowledge your understanding of our use of cookies as described in the Cookie Policy.

8. LAWFULNESS OF PROCESSING BASED ON CONSENT

Where we rely on your consent as the legal basis for processing your personal data, such as for the deployment of certain non-essential cookies, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of any processing carried out prior to such withdrawal, nor does it affect processing of your personal data conducted on legal bases other than consent.

You may withdraw your consent for cookies at any time by adjusting your preferences through the cookie consent management tool on the Website or by modifying your browser settings. For other processing activities based on consent, you may withdraw your consent by contacting us using the details provided in Section 2 of this Policy.

9. SPECIAL CATEGORIES OF PERSONAL DATA

We do not intend to collect or process special categories of personal data (also known as sensitive personal data) through the Website. Special categories of personal data include data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data processed for the purpose of uniquely identifying a natural person, data concerning health, and data concerning a natural person's sex life or sexual orientation.

We respectfully request that you do not submit any special categories of personal data to us via contact forms, email, or any other communication channel associated with the Website. If you believe that you have inadvertently provided such data to us, please contact us immediately using the details in Section 2, and we will assess the situation and, where appropriate and required by law, delete such data in a secure manner.

10. PERSONAL DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES

We do not collect or process personal data relating to criminal convictions and offences through the Website, except where such processing is authorised by applicable law or is necessary for compliance with a legal obligation or for the establishment, exercise, or defence of legal claims.

11. DATA RELATING TO CHILDREN

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 under the laws of your jurisdiction. We do not knowingly collect, solicit, or process personal data from children.

If you are a parent or guardian and you believe that a child under your care has provided us with personal data via the Website without your consent, please contact us immediately using the details provided in Section 2. Upon verification, we will take appropriate steps to delete such data from our systems in accordance with applicable law.

12. DISCLOSURE OF PERSONAL DATA AND CATEGORIES OF RECIPIENTS

We do not sell, rent, trade, or otherwise commercially exploit your personal data. We may disclose personal data, strictly on a need-to-know basis and subject to appropriate safeguards, to the following categories of recipients.

Service Providers and Data Processors. We may share personal data with third-party service providers that perform services on our behalf and under our instructions, including website hosting and infrastructure providers, information technology and cybersecurity service providers, analytics providers (where you have consented to analytical cookies), professional advisers such as legal counsel, accountants, auditors, and compliance consultants, and communication and email service providers. All such service providers are contractually bound to process personal data only in accordance with our instructions and applicable data protection laws, to maintain appropriate confidentiality and security measures, and to refrain from using personal data for their own purposes.

Affiliated Entities. We may share personal data with entities within our corporate group or structure where necessary for internal administrative purposes, for the provision of centralised services such as IT support or compliance functions, and for corporate governance and reporting purposes. Any such sharing is conducted in accordance with this Policy and subject to appropriate data protection safeguards.

Public Authorities and Legal Compliance. We may disclose personal data to governmental bodies, regulatory authorities, law enforcement agencies,

courts, or other public authorities where we are required to do so by applicable law, regulation, or binding legal process, where disclosure is necessary to comply with a legal obligation to which we are subject, where disclosure is necessary to respond to lawful requests or subpoenas from competent authorities, or where disclosure is necessary to establish, exercise, or defend legal claims or to protect our rights, property, safety, or legitimate interests or those of our stakeholders.

Business Transactions. In the event of a merger, acquisition, reorganisation, asset sale, or similar corporate transaction involving all or part of our business, personal data may be transferred to the acquiring entity or successor organisation as part of the transaction. In such circumstances, we will take reasonable steps to ensure that the recipient agrees to process personal data in accordance with this Policy and applicable data protection laws, and we will notify you of any material changes to the processing of your personal data where required by law.

In all cases of disclosure, we ensure that personal data is shared only to the extent necessary for the specified purpose and that appropriate contractual, technical, and organisational safeguards are in place to protect the data.

13. INTERNATIONAL DATA TRANSFERS

Personal data collected via the Website may, in certain circumstances, be transferred to, stored in, or otherwise processed in countries outside the European Economic Area (EEA) or outside jurisdictions that have been recognised by the European Commission as providing an adequate level of data protection. Such transfers may occur where our service providers, affiliated entities, or infrastructure are located in or operate from such countries.

Where personal data is transferred outside the EEA, we ensure that appropriate safeguards are implemented in accordance with Chapter V of the GDPR to provide an adequate level of protection. Such safeguards may include transfers to countries that have received an adequacy decision

from the European Commission pursuant to Article 45 of the GDPR, recognising that the country ensures an adequate level of data protection. They may include the implementation of Standard Contractual Clauses approved by the European Commission pursuant to Article 46(2)(c) of the GDPR, which impose contractual obligations on the data importer to protect the data and uphold data subject rights. They may include, where applicable, reliance on binding corporate rules approved by a competent supervisory authority pursuant to Article 47 of the GDPR. They may also include other lawful transfer mechanisms permitted under the GDPR.

You may obtain a copy of the relevant safeguards we have implemented for international data transfers, including Standard Contractual Clauses, by contacting us using the details provided in Section 2. Additional information about international transfers in the context of cookies is also provided in our Cookie Policy.

14. DATA RETENTION

We retain personal data only for as long as is reasonably necessary to fulfil the purposes for which it was collected, as described in this Policy, or as required to comply with applicable legal, regulatory, tax, accounting, or reporting obligations.

Communications Data. Personal data contained in communications, such as emails, contact form submissions, or other correspondence, is retained for as long as necessary to respond to your inquiry, for the duration of any ongoing correspondence or business relationship, and for a reasonable period thereafter for record-keeping purposes, to address potential disputes or legal claims, and to comply with applicable retention requirements. In the absence of an ongoing relationship or specific legal obligation, such data is typically retained for a period not exceeding six (6) years from the date of the last communication, which corresponds to the general limitation period for contractual claims under Maltese law.

Technical and Usage Data. Technical and usage data, including data derived from server logs and cookies, is retained in accordance with our

Cookie Policy and internal data retention schedules. Such data is generally retained for limited periods necessary for security monitoring, troubleshooting, and analytical purposes (where consented), after which it is deleted, anonymised, or aggregated such that it no longer constitutes personal data.

Legal Obligations and Claims. Notwithstanding the foregoing, we may retain personal data for longer periods where required by applicable law or where retention is necessary for the establishment, exercise, or defence of legal claims.

When personal data is no longer required for the purposes for which it was collected and no legal obligation requires its continued retention, we will securely delete or irreversibly anonymise the data using appropriate technical measures.

15. SECURITY MEASURES

We implement appropriate technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, access, or processing. The specific measures we employ are determined by reference to the nature, scope, context, and purposes of processing, as well as the risks to the rights and freedoms of data subjects.

Our security measures include, as appropriate to the circumstances, access controls and authentication mechanisms to ensure that personal data is accessible only to authorised personnel on a need-to-know basis. They include network security measures such as firewalls, intrusion detection systems, and secure configurations. They include encryption of personal data in transit and, where appropriate, at rest. They include pseudonymisation and anonymisation techniques where suitable to reduce identifiability. They include secure hosting environments with appropriate physical and logical access controls. They include regular monitoring, logging, and review of systems and access. They include business continuity and disaster recovery procedures. They include regular

security assessments and, where appropriate, penetration testing. They include staff training and awareness programmes on data protection and information security.

While we strive to maintain a high level of security, no method of transmission over the Internet, method of electronic storage, or security system is completely impenetrable. You acknowledge that you provide personal data at your own risk and that we cannot guarantee absolute security against all threats. In the event of a personal data breach that is likely to result in a high risk to your rights and freedoms, we will notify you without undue delay in accordance with Article 34 of the GDPR, unless one of the exceptions set forth therein applies.

16. YOUR DATA PROTECTION RIGHTS

To the extent that we process personal data relating to you and you are within the scope of the GDPR, you are entitled to exercise the following rights, subject to the conditions and limitations set forth in applicable law.

Right of Access. You have the right to obtain confirmation as to whether we process personal data concerning you and, if so, to access such data and receive information about the purposes of processing, the categories of data concerned, the recipients or categories of recipients to whom the data has been or will be disclosed, the envisaged retention period, the existence of your other rights, the source of the data where it was not collected directly from you, and the existence of any automated decision-making. You are entitled to receive a copy of the personal data undergoing processing, free of charge for the first request, with reasonable fees for further copies.

Right to Rectification. You have the right to request the correction of inaccurate personal data concerning you and to have incomplete personal data completed, including by providing a supplementary statement.

Right to Erasure. You have the right to request the deletion of your personal data in certain circumstances, including where the data is no longer

necessary for the purposes for which it was collected, where you withdraw consent and no other legal basis for processing exists, where you object to processing and there are no overriding legitimate grounds, where the data has been unlawfully processed, where erasure is required for compliance with a legal obligation, or where the data was collected in relation to the offer of information society services to a child.

Right to Restriction of Processing. You have the right to request that we restrict the processing of your personal data in certain circumstances, including where the accuracy of the data is contested (for a period enabling us to verify accuracy), where the processing is unlawful and you oppose erasure, where we no longer need the data but you require it for legal claims, or where you have objected to processing pending verification of whether our legitimate grounds override yours.

Right to Data Portability. You have the right to receive the personal data you have provided to us in a structured, commonly used, and machine-readable format and to transmit that data to another controller without hindrance, where processing is based on consent or contract and is carried out by automated means. Where technically feasible, you have the right to have the data transmitted directly from us to another controller.

Right to Object. You have the right to object, on grounds relating to your particular situation, at any time to the processing of your personal data based on our legitimate interests. Upon such objection, we will cease processing unless we demonstrate compelling legitimate grounds that override your interests, rights, and freedoms, or unless processing is necessary for the establishment, exercise, or defence of legal claims. You have the right to object at any time to processing of your personal data for direct marketing purposes; however, we confirm that we do not use the Website for direct marketing activities.

Right to Withdraw Consent. Where processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

Right Not to Be Subject to Automated Decision-Making. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such decision is necessary for entering into or performing a contract, is authorised by applicable law, or is based on your explicit consent. As noted in Section 6, we do not engage in such automated decision-making.

To exercise any of these rights, please submit a request to us using the contact details provided in Section 2 of this Policy. We may need to verify your identity before responding to your request to ensure that personal data is not disclosed to unauthorised persons. We will respond to your request within one (1) month of receipt, which period may be extended by a further two (2) months where necessary, taking into account the complexity and number of requests, in which case we will inform you of any such extension within the initial one-month period.

17. RIGHT TO LODGE A COMPLAINT

If you believe that our processing of your personal data infringes applicable data protection laws, you have the right to lodge a complaint with a supervisory authority. In Malta, the competent supervisory authority is the Information and Data Protection Commissioner (IDPC). Contact information and further details are available through the official website and channels of the IDPC.

You also have the right to lodge a complaint with the supervisory authority in your country of habitual residence, your place of work, or the place of the alleged infringement, and to seek judicial remedy before the competent courts.

We encourage you to contact us first using the details in Section 2 so that we may address your concerns directly before you escalate to a supervisory authority.

18. THIRD-PARTY WEBSITES AND LINKS

The Website may contain hyperlinks to websites, platforms, or resources owned, operated, or maintained by third parties. These links are provided solely for your convenience and informational purposes.

We have no control over, and assume no responsibility for, the content, privacy policies, practices, or data processing activities of any third-party websites. The inclusion of any link on the Website does not imply endorsement, sponsorship, or affiliation by Goldfish Capital Ltd. We encourage you to review carefully the privacy policies and terms of any third-party website before providing any personal data or engaging in any transaction.

19. DO NOT TRACK SIGNALS

Some web browsers transmit "Do Not Track" (DNT) signals to websites. There is currently no universally accepted standard for how websites should respond to DNT signals. At present, the Website does not alter its data collection or processing practices in response to DNT signals. We will continue to monitor regulatory and industry developments in this area and may update our practices if a clear standard emerges.

20. CALIFORNIA PRIVACY RIGHTS

If you are a resident of California, United States, you may have additional rights under the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA). However, given that Goldfish Capital Ltd. is a private investment and holding company that does not provide services to the public, does not solicit external clients, and does not conduct business activities targeting California residents, we do not believe that we meet the thresholds for applicability of the CCPA/CPRA. If you have questions regarding your rights under California law, please contact us using the details in Section 2.

21. CHANGES TO THIS PRIVACY POLICY

We may update or amend this Privacy Policy from time to time to reflect changes in applicable laws, regulations, or regulatory guidance, changes in our data processing practices, corporate structure, or operations, changes in the functionality, technologies, or features of the Website, and feedback from data subjects, supervisory authorities, or other stakeholders. When we make changes to this Policy, we will update the "Last Updated" date at the top of this document and publish the revised Policy on the Website. Where we make material changes that significantly affect how we process your personal data, we will provide prominent notice on the Website or, where appropriate and required by law, notify you by other means such as email. Where required by applicable law, we may seek your renewed consent for certain processing activities.

We encourage you to review this Policy periodically to remain informed about how we collect, use, and protect your personal data. Your continued access to or use of the Website following the posting of any changes constitutes your acknowledgement and acceptance of the updated Policy.

22. GOVERNING LAW AND JURISDICTION

This Privacy Policy shall be governed by and construed in accordance with the laws of Malta, without regard to its conflict of laws principles. Any dispute arising out of or in connection with this Policy or the processing of your personal data shall be subject to the jurisdiction of the courts of Malta, without prejudice to your right to lodge complaints with supervisory authorities or to bring proceedings before the courts of your place of habitual residence as provided under the GDPR.

23. SEVERABILITY

If any provision of this Privacy Policy is held by a court or other tribunal of competent jurisdiction to be invalid, illegal, or unenforceable for any reason, such provision shall be modified to the minimum extent necessary

to render it valid, legal, and enforceable while preserving its original intent to the maximum extent possible. If such modification is not possible, the provision shall be severed, and the remaining provisions of this Policy shall continue in full force and effect.

24. ENTIRE AGREEMENT ON DATA PROTECTION MATTERS

This Privacy Policy, together with our Cookie Policy and any supplementary privacy notices we may provide, constitutes the entire statement of our data protection practices with respect to the Website and supersedes all prior or contemporaneous representations, understandings, or agreements regarding the subject matter hereof.

25. CONTACT INFORMATION

If you have any questions, comments, or concerns regarding this Privacy Policy, our data processing practices, or if you wish to exercise any 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