

PRIVACY POLICY

“Impulse Management Company” Closed Joint Stock Company (“we”, “us” or “our”) is committed to complying with its legal obligations under the applicable laws and to the protection of the rights and freedoms of individuals whose personal data we obtain or generate as part of our activities.

We use information held about you in the following ways:

- To provide you with information and support that you request from us or expect within the scope of cooperation between us and you.
- To provide you with newsletters, information about our upcoming events and projects that we feel may interest you.
- To allow you to participate in our events, discussions and supporting activities when you choose to do so.
- To use your personal data, including photos or videos with your participation in various media channels, including social media.
- To prepare and generate statistics and other reports.
- To examine your requests and ensure immediate connection with you.
- To disclose or share your personal data if we are under a duty to do so in order to comply with any legal obligation.

We shall not process your personal data for the purposes other than listed above or prescribed by the applicable law.

For the purposes of identification of your preferences, personalization and improving the Website usability “cookie” files are used. If you do not wish to use “cookie” files, you shall change the Web browser settings. You shall be aware that disabling cookie may lead to inability to access the Website.

The date of giving consent to the processing of your personal data is the date of submitting your personal data through the website.

We implement or ensure implementation of appropriate technical and organizational measures to protect the information we collect and store from unlawful or accidental access to it, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions in relation to personal data.

Whilst we use our best efforts to ensure the security of your personal data, please be aware that the security of information transmitted over the Internet cannot be guaranteed. Accordingly, any transfer of personal data over the Internet, including during submission of such information to the Website, is done at your own risk.

Rights of a Data Subject

As a data subject you have certain rights which you may exercise if we are in possession of, or is processing, your personal data. Specifically:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – you have a right, in certain circumstances, to ask for the data we hold about you to be erased from our records.
- **Right to restriction of processing** – where certain conditions apply you have a right to restrict the processing of your personal data.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organization.
- **Right to object** – you have the right to object to certain types of processing or to ask to stop or to restrict the processing of your personal data.

To exercise these rights please contact us using the contact details set out in the Contact Information section below. If we refuse your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the Complaints section below.

If you would like to receive further information concerning the processing of your personal data or to ask us to correct, update or delete any personal data relating to you, you may contact us with a request to do so at info@impulse.am. At the same time, to protect your privacy and security, please be aware that we may take reasonable steps to verify your identity before taking any steps based on your request (e.g., by asking you to indicate the e-mail address that you have previously submitted to the Website).

Basis of Processing Personal Data

We will only process personal data where we have lawful basis to do so. The lawful basis on which data is processed will depend on the nature of the information collected and the purposes for which it is used by us but will be one or more of following:

- **Consent:** you have provided your consent for us to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation:** the processing is necessary for us to comply with our legal obligations.
- **Vital interests:** the processing is necessary to protect someone's life.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party.

For these purposes we may collect your personal data including first name, last name, date of birth, nationality, country of residence, email addresses, contacts, data which are automatically submitted by using the Website pages (including, IP-address, source

of the Website visits and information of search or advertising request, data on the user device, the user clicks, hits on the elements of the Website pages, page views, data on the banners and videos views, data characterizing the audience segments, parameters of a session, information on time and duration of a visit, the user identifiers stored in “cookie” files).

Term for Holding Personal Data

We will only retain your personal data for the period necessary to fulfil the purposes for which it is collected and processed, or for such shorter or longer period as may be prescribed by applicable law. After such time, we will either delete or anonymize your personal data or, if this is not possible, we will securely store your personal data and isolate it from any further use until deletion is possible.

You may withdraw your consent on processing your personal data by email using Contact Information stated below. Once we have received your notification that you have withdrawn consent, we will delete your personal data in the databases hosted internally and (or) externally.

Security and Responsibility

We are not responsible for loss or disclosure of personal data if such data:

- appears in public domain before being lost or disclosed;
- was independently developed by the third parties;
- was obtained by the third parties by means of unauthorized access to the Website files;
- was disclosed with your consent.

You are responsible for lawfulness, correctness and truthfulness of the submitted personal data in accordance with the applicable legislation.

Contact Information

In case of any questions or requests, please contact us at info@impulse.am.

Complaints

If you wish to make a complaint about how your personal data is being processed by us or how your request has been handled, you have the right to lodge a complaint by contacting: info@impulse.am.

Changes to this Policy

We may update or amend this Policy from time to time to comply with law or to meet its changing internal policies without notice to you. Any updates will be posted, and the date of recent revisions will appear on the Website, so please check this page occasionally to see if you are happy with the current edition of the Policy.

Final Provisions

This Policy applies to this Website only. We do not control and is not responsible for the third parties' websites that you may switch to via the links available on this Website.