Abra Group Limited

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Privacy Policy For Shareholders And Investors

November 7th, 2024

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ABRA GROUP

PRIVACY POLICY FOR SHAREHOLDERS AND INVESTORS

Last Modified: November 7th, 2024

CONTENT

1. PURPOSE.

This Privacy Policy ("Privacy Policy") is applicable to all personal data that is received, used, transmitted, and transferred within the framework of your relationship as a shareholder and/or investor ("you" or "Shareholder and/or Investor") of Abra Group Limited (the "Parent Company"), its nonoperational subsidiaries Abra Group Platform Services LLC and Abra Global Finance, and any future Parent Company affiliates or subsidiaries acquired, formed, incorporated or otherwise created hereafter November 7th, 2024 (the "Effective Date") which do not already have a separate respective governing privacy policy in place as of the date of acquisition or creation (collectively, "Abra", "our", "us", "we", or the "Companies"). This Privacy Policy does not cover or govern our operational companies with governing privacy polices already in place as of the Effective Date (the "Operational Companies"). For purposes of the Operational Companies and their personal data collection and use, their respective privacy polices shall govern and this Privacy Policy shall only be applicable and govern the personal data collection and use of Abra.

We recognize the importance of the security, privacy, and confidentiality of the personal data of our Shareholders and Investors (hereinafter, a "Data Subject" or "Data Subjects") when they carry out any activity that involves personal data transmission. The purpose of this Privacy Policy is to communicate and inform how we use and maintain the security of your personal information.

2. AUTHORITY.

Our legal, compliance and IT teams (our "Privacy Team") are responsible for the matters related to data privacy. The Compliance Department will lead the Privacy Team. The Privacy Team will report to our Audit Committee (the "Audit Committee").

This document is the responsibility of our Privacy Team and modifications to this document must be approved by the Audit Committee and the Board of Directors of Abra.

3. DEFINITIONS

For the purposes of this Policy, the following words and expressions shall have the meaning provided below:

- **"Bond"**: means any secured or unsecured note issued by any of the Companies.
- "**Investor"**: an individual or entity who holds at least one Bond.
- **"Shareholder"**: means an individual or entity who holds at least one Share.
- **"Share"**: means ordinary share and any other share of any class or series of capital stock of the Companies from time to time, as well as any right to buy or sell a share of the Companies.

4. ACCEPTANCE OF THIS PRIVACY POLICY.

By acquiring a Share or a Bond of the Companies you accept and consent to this Privacy Policy under its terms and you provide your free, express and informed consent to the Companies to partially and/or fully use your personal information and/or personal information of third parties that have allowed you to do so in relation to the legal relationship as Shareholder and/or Investor, within the framework of the fulfillment of the obligations related to investor relations and management of the Shares and Bonds by the Companies.

5. CONTENT

5.1 WHAT CONSTITUTES PERSONAL INFORMATION?

We define personal data as all personal information that identify, relate to or may be associated with one or more natural persons, such as: your name, surname, contact information, location data, electronic signatures, and birthdate, among other similar identifying information.

5.2 WHAT TYPE OF PERSONAL INFORMATION DO WE RECEIVE?

Pursuant to the purposes described in this Privacy Policy and the nature of the services contracted, please note that we may receive the following categories of personal data from you:

- **General identification information**: name, surname, type and number of identification or ID, electronic signature, personal contact information.
- **Location information**: telephone number (landline and mobile), mailing addresses, e-mail address, fax number.
- **Socioeconomic content information**: corporate name, tax and fiscal identification information, information about Shares and/or Bonds, banking information for payments and other financial information applicable.

5.3 HOW WE USE YOUR PERSONAL INFORMATION?

The collected personal information may be used by the Companies for the following purposes:

- Keeping the records of their Shareholders and Investors.
- Accessing and updating the personal data of their Shareholders and Investors.
- Contacting and sending information regarding the Companies.
- Issuing certifications required by Shareholders or Investors.
- Paying dividends.
- Processing inquiries, claims and complaints.
- Carrying out accounting records.
- Managing correspondence and e-mail communications or telephone calls.
- Requesting your approval (for matters that require Shareholder or Bondholder approval).
- Processing and/or initiating legal proceedings.
- Recording the transfer of Shares or Bonds.
- Recording levies on Shares and Bonds.
- Responding to the requirements of different national and international oversight and supervision, administrative and judicial authorities.
- Verifying and requesting criminal records and the existence of administrative sanctions.

- Verifying and accessing restrictive lists.
- Responding to the requirements of banking institutions and/or insurance companies, which maintain contractual or business relations with the Companies.
- Using or disclosing them for fraud detection or prevention.
- Allowing access to personal data and information to auditors or third parties hired by the Companies to perform internal or external audit processes of the commercial activities carried out by the Companies.
- Contracting third parties for the storage and/or processing thereof under safety and confidentiality standards.
- Transmitting them to national or international entities to which the Companies will commission processes related to Shares or Bonds.
- Transmitting them to third parties interested in investing in the Companies or in any integration process under any legal form provided by law.
- Legitimate interests, unless those interests are overridden by your rights or freedoms.
- Any other activity that is necessary to comply with the applicable laws and regulations or related to judicial or administrative orders.
- Any other activity that is necessary to comply with the relation between the Shareholders and/or Investors.

Finally, please note that we do not sell or trade your personal information.

5.4 WHO IS RESPONSIBLE FOR SECURITY?

All personal data processed in relation to this Privacy Policy is the responsibility of the data controller ("Data Controller") of Abra for purposes of establishing the requisite legal and commercial relations with the Shareholders and/or Investors within the framework of the fulfillment of the obligations derived from the investor relations and management of the Shares and Bonds by the Companies.

Our Data Controller's information is as follows:

1 Ashley Road, 3rd Floor
Altrincham, Cheshire, UK WA14 2DT
E-mail: compliance@abragroup.net

5.5 PROTECTION, SECURITY AND CONFIDENTIALITY OF PERSONAL INFORMATION.

Protection, security and confidentiality of information and personal data of Data Subjects is of vital importance to the Companies. We apply appropriate technical, physical and administrative safeguards and access restrictions to secure your information in accordance with this Privacy Policy in order to prevent the unauthorized access, unauthorized use, unlawful processing, unauthorized or accidental loss, and destruction or damage to that information.

We maintain appropriate information security policies, procedures and standards, which may change at any time at our sole discretion, and which the sole purpose of protecting and preserving the integrity, confidentiality and availability of personal information, regardless of the media and/or format in which it is stored or located, temporarily or permanently, as well how they are transmitted.

In this sense, we rely on a number of technological security tools and implement industry-recognized security practices, including: information transmission and storage through secure mechanisms, such as use of secure protocols, securing technological components, restricting access to information only to authorized personnel, backup of information, secure software development practices, firewalls, antivirus, and IPS, among technological security tools.

Third parties engaged by the Companies (contractors, external consultants, temporary collaborators, etc.) involved with processing of the personal information of Shareholders and/or Investors are also under the obligation to keep and maintain security protocols and are subject to data protection laws and regulations.

5.6 RETENTION POLICY.

Personal data provided by Shareholders and/or Investors will be kept for the time necessary to fulfill the established purposes, in accordance with the contracting of the service and in compliance with the applicable regulations. Therefore, please note that personal information may remain stored for a minimum of twenty (20) years from the date of the last processing and with the aim to allow the Companies to fulfill their legal and/or contractual obligations regarding accounting, tax, administrative and/or other applicable matters, as well as for the time necessary to fulfill all applicable provisions regarding the handling of complaints, claims and/or queries and that require the Companies to carry out certain data processing in compliance with the procedures and requirements of regulatory and control authorities and entities of any jurisdiction in which we operate.

5.7 TRUTHFULNESS OF INFORMATION.

It is your duty as a Data Subject and the duty of the third parties that you have authorized to act on your behalf to provide the Companies with your updated, truthful, complete, exact and correct personal information, the quality of the information provided allows us to make possible to establish the legal and commercial relations with Shareholders and/or Investors within the framework of the fulfillment of the obligations derived from the activities related to investor relations and management of the Shares and Bonds by the Companies. We may periodically request our Shareholders and/or Investors to review and update the information we have about them.

The Companies shall presume the truthfulness of the information provided and shall assume no obligation of verifying the identity, truthfulness, validity, sufficiency, and authenticity of the information and/or documents provided by each of the Data Subjects. Therefore, the Companies shall assume no responsibility for damages of any nature that originate from the lack of veracity, validity, sufficiency or authenticity of the personal information, including damages that may derive from homonymy and/or identity theft.

5.8 PERSONAL INFORMATION OF MINORS.

We recognize the special level of protection that personal information of children and adolescents under the age of 13 (hereinafter, "Minors") are afforded. We do not knowingly solicit or collect personal information from Minors without parental consent. Please note that for the purposes of establishing the legal relations with Shareholders and/or Investors within the framework of the fulfillment of the obligations related to investors relationship and management of Shares and Bonds by the Companies, we will not use or process any Minors personal data and information received. If we learn that we have collected any Minors personal data and information, we will promptly delete such information.

5.9 WHY AND WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We may share your personal information among the Companies and with the third parties listed below for the following purposes: (a) establish a legal and commercial relations with Shareholders and/or Investors within the framework of the fulfillment of the obligations derived from the investor relations and management of Shares and Bonds by the Companies; (b) perform legitimate business interests, in accordance with the consent and/or authorization given to us; and (c) fulfill the legal obligations in accordance with the applicable governing law. Therefore, your personal information may be shared with the following categories of third parties and/or recipients:

- Suppliers and/or subcontractors of licensing companies, IT equipment maintenance, IT tools, communication channels support, IT hardware, cloud storage and technology infrastructure.
- Financial entities, payment gateways, credit bureaus, anti-fraud controls and payment processing.
- Insurers, trustees, notes registers, agents, listing agents, collateral agents and depository entities.
- Third parties responsible for the management of our investor relationships.
- Government bodies to comply with the legal obligations, when applicable laws so require or due to a procedure, requirement, request or similar action from any authority.
- A successor entity to Abra following a change of control, including a merger, acquisition, sale of assets, reorganization, or other similar transfer of more than 50% ownership interests in Abra to such third party.

Given that the Parent Company and our Data Controller is located outside of the European Union, it is therefore possible that in some cases, recipients of your personal information and personal data are located outside of the country where your personal information was originally collected with the sole purpose of establishing the legal and commercial relations with Shareholders and/or Investors within the framework of the fulfillment of the obligations derived from the investors relations and management of Shares and Bonds by the Companies, or for legally established reasons and/or under coverage of applicable regulations.

6. RIGHTS OF THE DATA SUBJECT.

You may have certain rights regarding the use of your personal information, subject to applicable local laws:

- Access: You may have the right to ask for a copy of the personal information that we hold about you.
- Correction: You may notify us of changes to your personal information if it is inaccurate or it needs to be updated.
- Deletion: If you think that we should not be holding or processing your personal information anymore, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- Restrictions on use: You may request that we limit the processing of your personal information in

certain circumstances. Requirements by law to process your personal information override your own rights.

- Object: You have the right to object to processing, including for direct marketing and where processing is based on legitimate interests.
- Portability: If you wish to transfer certain personal information to another organization (and certain conditions are satisfied), you may request that we provide you with a copy.
- Withdrawal of consent: If we are processing personal information subject to your consent, such as for marketing, you may withdraw consent at any time

For queries in excess of once per calendar month, the Companies may charge the Data Subject making said request for shipment and reproduction expenses, if applicable.

6.1 ACCREDITATION OF OWNERSHIP.

In order to process your requests, questions and/or claims, or for you to exercise any of the rights specified in this Privacy Policy, you must accredit your identity and ownership of the requisite personal information and provide, in all cases, the pertinent information that allows us to accredit the Data Subject's identity and for it to be valid under applicable law. Therefore, we may request documents and/or information that allow us to validate your ownership, properly address questions and complaints, avoid loss, confirm whether certain persons are empowered to act on your behalf, and address alleged incidents of unauthorized or fraudulent access to the personal information for which we are responsible for.

When the petition is made by someone other than the Data Subject, the third party must duly accredit power of attorney to act on behalf of the Data Subject by sending the supporting documents.

The request to exercise the rights as a Data Subject must be submitted in writing and/or digitally through a channel enabled by the Companies for that purpose, which you may find in Section 6.3.

Any request must include, at minimum, the following:

- The Data Subject's information and/or of their representative or person exercising the right on their behalf.
- Copy of the identification document or equivalent document accrediting the identity of the Data Subject and considered valid under the law. If acting through a legal representative, the identification document or equivalent document accrediting the identity of the representative must be submitted.
- Concrete description of the request and justification of the invoked right.
- Physical and/or electronic address to send the response and notifications.
- Documents supporting the request (if applicable).

Your request will only be processed if the identity and ownership of the requesting party can be accredited and the above-mentioned requirements are met.

6.2 CLAIMS.

The Data Subject and/or their authorized representative may submit claims before the Data Controller when they consider their personal information is subject to correction, rectification, update, suppression and/or they have knowledge of an alleged breach of the personal information processing obligations set forth in applicable legislation. The right to claim must not adversely affect the rights and liberties of other Data Subject. Therefore, this right can only be exercised using the channel enabled by the Companies.

In any case, the Data Subject is entitled to make claims before the corresponding local authority for personal data protection, following the procedural requirements provided by applicable local laws. Please note that certain governing jurisdictions require that you first contact the Data Controller before submitting any local authority claims.

It is possible that the Companies may not respond to your full request or total or partial access to the information, in the following cases:

- The requesting party is not the Data Subject, or the legal representative accredited for that purpose.
- The information and the personal information of the requesting party is not in the Companies' data base.
- There is a legal impediment or resolution from an authority to deny such requests.
- Rectification, cancellation or opposition has been previously made and the request lacks substance as a result.

6.3 HOW CAN YOU EXERCISE YOUR RIGHTS? GENERAL PROCEDURE FOR THE EXERCISE OF THE RIGHTS OF DATA SUBJECTS

This Privacy Policy defines the general procedure to exercise your rights, notwithstanding the enforcement of specific stipulations and procedures and/or those of local laws in the territory where you are located and/or where we collect your information.

In order to exercise your rights or submit any claims or complaints, the Companies have established the following e-mail address as the official channel of communication: compliance@abragroup.net.

7. MODIFICATIONS TO THIS PRIVACY POLICY

We reserve the right to make changes and/or updates at any time to this Privacy Policy in our sole discretion, including, but not limited to, responses to new legislation, internal policies or new requirements to provide or offer the services or products.

These changes are available to the public on our website at https://abragroup.net/privacy-policy/.

8. ETHICS HOTLINE.

We have contracted Navex Global Inc., an independent company incorporated under the laws of the State of Delaware, U.S., to manage an "Ethics Hotline" for collaborators, related third parties, suppliers, Shareholders, Investors, travelers, clients, users and the public in general to submit questions, reveal conflicts of interest or make claims, which shall be treated confidentially. Through this Ethics Hotline we guarantee anonymity, if the person making the report wishes to hide his or her identity. The Ethics Hotline is available 24/7 at https://secure.ethicspoint.com/domain/media/en/gui/94767/index.html and is subject to applicable data privacy laws and regulations.

9. VALIDITY OF THIS DOCUMENT.

This general Privacy Policy shall enter into force on the day of its publication, replacing any previous published version. The Companies may amend, modify or withdraw any part of its content at any time, by publishing the updated text on this site and/or by sending it to the Data Subject through any other mechanism of acceptance in the event of substantial modifications.

Version	Approval Date	Publication Date
1.	November 7th, 2024	December 2nd, 2024