

## Cookie Policy

### 1. Introduction

**ELEON CAPITAL MANAGEMENT** (the 'Company' or 'Fund Manager' or 'AIFM') was incorporated as a private company limited. The Company was granted authorisation with Licence number AIFM45/56/2013, and is regulated and supervised, by the Cyprus Securities and Exchange Commission ('CySEC'), to operate as an Alternative Investment Fund Manager ('AIFM') in accordance with the provisions of the Alternative Investment Funds Managers' Law of 2013 (Law 56(I)/2013, hereafter the 'AIFM Law'), as amended from time to time.

### 2. Scope

2.1. With the implementation of the Cookie Policy (the "Policy") the Company aims to outline and explain how the Company manages and uses cookies on its website and how clients are affected by cookies.

### 3. Use of "Cookies"

3.1. The Company may use cookies to assess and improve the performance of the website and its products and services offered to its clients.

### 4. What are "Cookies"

4.1. Cookies are small pieces (i.e. text files) of information that use a unique identification tag and are stored on clients' computers, mobile devices, or any other device as a result of clients using the Company's website or other services the Company provides to its clients. The cookies are stored on the clients' computer, mobile device or any other device, only once clients are asked and accept the storage of this information.

4.2. Cookies have many functions and can serve the Company in various ways. For example, cookies are used by the Company to recognise and distinguish each client who uses the Company's website by remembering their username and preferences. This helps the Company to provide clients with a good experience, provide clients with a more customized web browsing experience and allow the company to improve its website. Cookies are not used to determine the personal identity of every person merely visiting the Company's website but instead collect more general information such as how users arrive on the Company's website, how they use its website or to determine a user's general location.

## 5. Types of “Cookies” used by the Company

- 5.1. **Essential cookies** are required for the operation of the Company’s website. These cookies allow clients to access various secured areas of the Company’s website. Clients, by opting to disable these cookies, may have a negative impact on their browsing experience and in particular, they will not be able to fully access secure areas of the Company’s website.
- 5.2. **Analytical/performance cookies** are used to recognize, monitor and track the number of visitors, how clients use the Company’s website and for how long. This helps the Company to improve the way its website works and consequently to improve how the Company provides the Company’s website content to clients. These cookies are not used to determine the personal identity of clients.
- 5.3. **Functionality cookies** are used to allow the Company to remember clients’ preferences and to recognize when a client returns to the Company’s website. This helps the Company to personalize its website content for clients. For example, these cookies remember clients’ username and the customization preference previously selected by clients such as the language of the region.
- 5.4. **Targeting cookies** are cookies that record clients’ visits to Company’s websites, pages visited and links followed. This information is shared with third parties such as advertising and social media websites for the provision of services such as:
- Use information about clients’ visits to target advertising to clients on other websites
  - Use information about clients’ visits in order to present clients with advertisements that might be in clients’ interest
  - Use information about clients’ visits for the purposes of matching, audience research and creation of audience segments.

## 6. Opt-out/Disable “Cookies”

- 6.1. Clients may be able to refuse to have cookies stored on their computer, mobile device or any other device by changing the settings of their browser to refuse all cookies, and/or have their device notify them each time a cookie is sent to their device. However, controlling their cookies in this way may impair the quality of service provided by the Company to its clients and therefore, it is recommended for clients to allow cookies on their device to ensure the best possible experience and quality services provided by the Company and/or to fully access secure areas of the Company’s website.

## 7. General Information

- 7.1. Cookies are not used to determine the personal identity of every person merely visiting the Company’s website but instead collect more general information such as



how users arrive on the Company's website, how they use its website or to determine a user's general location. The clients' privacy is considered and treated by Company with utmost importance and highest priority and this Policy applies to former, existing and potential clients as well as to any visitors of the Company's website.

For further details with regards to the use of clients' personal information/data please refer to the Company's Privacy Policy, available on the Company's website or you may contact the Company's Support Department at [info@eleoncapital.com](mailto:info@eleoncapital.com).