BORA CAPITAL ADVISORS LTD

WEBSITE PRIVACY AND COOKIE POLICY

Legal, Privacy and Regulatory Notice

REGULATORY AND LEGAL BASIS

This document is intended to support Bora Capital Advisors LTD's public-facing privacy, electronic communication and website governance obligations. It should be read and maintained alongside the Company's internal compliance framework, client agreements, product prospectuses, investment mandates and operational procedures.

- Data Protection Act, 2012 (Act 843) and applicable guidance, registration conditions and directives of the Data Protection Commission of Ghana.
- Securities Industry Act, 2016 (Act 929), as amended, and applicable Securities and Exchange Commission regulations, directives, guidelines and licensing conditions.
- Securities Industry (Electronic Communications, Recordkeeping and Off-Channel Communications for the Securities Market) Guidelines, 2026.
- Electronic Transactions Act, 2008 (Act 772), as amended, where relevant to electronic information, communications and transactions.
- Anti-Money Laundering Act, 2020 (Act 1044) and applicable AML/CFT/CPF requirements, including Financial Intelligence Centre and SEC requirements.
- Companies Act, 2019 (Act 992), applicable tax legislation, contractual obligations, common-law duties and other laws applicable to Bora's operations.

Where a mandatory legal or regulatory requirement conflicts with this document, the mandatory requirement prevails. Bora may amend this document promptly to reflect such a change.

1. INTRODUCTION AND SCOPE

Bora Capital Advisors LTD ("Bora") is committed to protecting the privacy, confidentiality and security of personal data entrusted to us. Responsible handling of personal data forms part of our duties to clients, investors, prospective clients, employees, representatives, service providers, regulators and other stakeholders.

This Privacy Policy explains how Bora collects, uses, stores, shares, protects and otherwise processes personal data when an individual visits or interacts with our website, enquires about or uses our investment services, subscribes to or invests in a product managed or distributed by Bora, communicates with us, attends an event, submits a complaint, acts for an institutional client, applies for employment, supplies services to us or otherwise interacts with Bora.

This Policy should be read with any product prospectus, mandate, application form, investment-management agreement, consent notice, cookie notice, client terms, privacy notice or other documentation applicable to the relevant relationship. Where a specific document imposes additional lawful requirements, those requirements apply to the relevant activity.

2. ABOUT BORA CAPITAL ADVISORS LTD

Bora Capital Advisors LTD is a Ghanaian financial services institution regulated by the Securities and Exchange Commission of Ghana in respect of activities requiring regulatory authorization. For purposes of the Data Protection Act, 2012 (Act 843), Bora acts principally as a Data Controller where it determines the purpose and means of processing personal data. In defined arrangements, Bora may also act as a Data Processor for another controller.

Principal Office: No. 3 Dano Court, Boundary Road, East Legon, Accra.

Data Protection Commission Registration ID: DC16060000514B.

3. DATA PROTECTION PRINCIPLES

Bora seeks to ensure that personal data is processed consistently with the data protection principles under applicable law. In particular, Bora will endeavour to ensure that personal data is:

- processed lawfully, reasonably and in a manner that respects the privacy of the individual;
- collected for specific, explicit and legitimate purposes;
- not further processed in a manner incompatible with those purposes;
- adequate, relevant and not excessive in relation to the purpose for which it is processed;
- accurate, complete and, where necessary, kept up to date;
- retained only for as long as necessary or required by law;
- protected by appropriate technical and organizational safeguards; and
- processed in a manner that enables accountability and respects applicable data-subject rights.

4. PERSONAL DATA WE COLLECT

4.1 Identification and KYC Information

- full name, former name or alias where relevant;
- date and place of birth, nationality and gender where required;
- photograph and signature;
- Ghana Card, passport or other legally accepted identification details;
- taxpayer and other statutory identification information where applicable;
- client, account or investor number; and
- information required to verify identity and authority to act.

4.2 Contact Information

- residential, business and postal address;
- telephone and mobile numbers;
- email address;
- emergency or nominated contact details; and
- communication preferences.

4.3 Financial, Investment and Transaction Information

- bank and settlement-account details;
- payment and transaction information;

- investment holdings, portfolio information and transaction history;
- investment objectives, time horizon, liquidity needs and risk tolerance;
- source of funds and source of wealth;
- income, asset and financial information where necessary;
- tax information;
- subscription, redemption, transfer and investment-instruction records; and
- information required to manage, value, report on or administer investments.

4.4 Compliance, Risk and Due-Diligence Information

- customer due diligence and enhanced due diligence information;
- beneficial-ownership information;
- PEP, sanctions and targeted-financial-sanctions screening results;
- adverse media or public-source due-diligence information;
- client risk classification and monitoring outcomes;
- fraud-prevention information;
- internal compliance alerts, investigations and disposition records; and
- regulatory enquiries, reports and related compliance information.

4.5 Corporate and Institutional Client Information

Where a client or counterparty is a company, trust, partnership, pension scheme or other legal arrangement, Bora may process personal data relating to directors, trustees, shareholders, partners, beneficial owners, officers, authorised signatories, employees, representatives and other connected persons.

4.6 Communications Information

Bora may collect and retain emails, letters, complaints, enquiries, meeting records, telephone records where lawfully recorded, investment instructions, confirmations and business communications conducted through approved channels. Such records may be retained for supervision, transaction evidence, dispute resolution, security, audit and regulatory recordkeeping.

4.7 Website and Technical Information

- IP address;
- browser and device type;
- operating system;
- pages viewed and navigation path;
- date, time and duration of access;
- referring source;
- session information;
- cookie or similar identifiers; and
- security, diagnostic and website-performance information.

4.8 Recruitment and Employment Information

Where a person applies for employment or engagement, Bora may process curriculum vitae information, qualifications, employment history, references, identification, background-check information, contact details and other recruitment records. Separate employee notices and internal policies may apply to employees and other workers.

5. HOW WE COLLECT PERSONAL DATA

5.1 Directly from You

We collect information when you complete an application or form, provide KYC documentation, invest or seek to invest, contact us, provide instructions, use our website, attend an event, respond to a survey, submit a complaint, apply for employment or otherwise provide information to Bora.

5.2 From Third Parties and Public Sources

Subject to applicable law, Bora may receive information from employers, trustees, pension administrators, custodians, banks, brokers, registrars, authorised representatives, verification providers, compliance databases, public registers, regulators, government agencies, sanctions and PEP databases and other lawful sources. Where required, Bora will provide or facilitate appropriate notification regarding such collection.

5.3 Automatically

Certain technical and usage information may be collected automatically when you access Bora's website or digital services.

6. PURPOSES OF PROCESSING

6.1 Providing Investment and Financial Services

- establishing and maintaining client relationships;
- opening and administering investment accounts;
- processing subscriptions, redemptions, transfers and other instructions;
- managing portfolios and collective investment schemes;
- executing or facilitating transactions;
- calculating valuations and preparing statements;
- client reporting and service communications; and
- delivering other contracted investment or advisory services.

6.2 Legal, Regulatory and Compliance Obligations

- KYC and customer due diligence;
- beneficial-ownership verification;
- AML/CFT/CPF and sanctions compliance;
- transaction monitoring and fraud prevention;
- regulatory, statutory and tax reporting;
- responding to lawful requests from the SEC, Financial Intelligence Centre, Data Protection Commission, Ghana Revenue Authority, courts, law-enforcement agencies and other competent authorities; and
- maintaining records required by law, regulation or License conditions.

6.3 Risk Management, Security and Assurance

We may process personal data to manage financial, operational, compliance, legal, cybersecurity and reputational risks; detect and investigate suspicious or fraudulent activity; protect systems and client assets; manage incidents; support business continuity and disaster recovery; conduct audit and control testing; and maintain effective internal governance.

6.4 Client Service and Relationship Management

Processing may support enquiries, complaints, service requests, client-data updates, product notices, surveys, service-quality monitoring and other relationship-management activities.

6.5 Business Administration

Bora may process personal data for accounting, audit, internal reporting, corporate governance, legal services, procurement, vendor management, human resources, training, operational administration and management reporting.

6.6 Marketing and Communications

Where permitted by law, Bora may use appropriate contact information to communicate information about products, services, events, publications or market updates. Where consent is required, marketing will occur only with appropriate consent. Individuals may opt out of direct marketing at any time without affecting operational, legal or regulatory communications.

7. LAWFUL BASES FOR PROCESSING

Depending on the circumstances, Bora may process personal data where processing is necessary for a contract or steps requested before entering a contract; necessary to comply with a legal or regulatory obligation; necessary for a legitimate interest pursued by Bora or another person where the individual's rights do not override that interest; necessary to protect a legitimate interest of the individual; otherwise authorized by law; or based on valid consent where consent is the appropriate lawful basis.

Where processing is based on consent, consent may be withdrawn subject to applicable legal and contractual limitations. Withdrawal does not affect processing lawfully undertaken before withdrawal. Where information is required for KYC, AML/CFT/CPF, securities regulation or contractual performance, failure to provide it may prevent Bora from establishing or continuing a relationship, opening an account, processing a transaction or providing a service.

8. SPECIAL PERSONAL DATA

Where Bora is required to process personal data that receives enhanced protection under applicable law, such processing will take place only where permitted by law and subject to safeguards proportionate to the sensitivity and risk of the data. Bora does not intentionally seek such information unless it is necessary for a legitimate and lawful purpose.

9. KYC, AML/CFT/CPF AND REGULATORY SCREENING

As a regulated capital-market operator, Bora is required to conduct due diligence and ongoing monitoring. This may involve checking clients, beneficial owners, directors, trustees, authorized representatives and connected persons against sanctions lists, PEP databases, regulatory databases, fraud-prevention sources, public records and other lawful compliance databases.

The results may affect whether Bora can establish, maintain or continue a relationship or execute a transaction. Bora may also be legally prohibited from informing an individual about certain reports, disclosures, investigations, freezes, restrictions or actions undertaken under AML/CFT/CPF and sanctions requirements.

10. DISCLOSURE AND SHARING OF PERSONAL DATA

Bora does not sell personal data. Subject to applicable law and the relevant purpose, personal data may be disclosed to:

- the Securities and Exchange Commission;
- the Financial Intelligence Centre;
- the Data Protection Commission;
- the Ghana Revenue Authority;
- courts, law-enforcement agencies and other competent public authorities;
- custodians, trustees, banks, brokers, registrars, fund administrators and other market infrastructure providers;
- auditors, legal advisers, insurers and professional advisers;
- technology, cybersecurity, hosting, data-storage and backup providers;
- identity-verification, screening and compliance providers;
- payment and settlement service providers;
- consultants, contractors and other service providers; and
- another person where disclosure is authorized, required or reasonably necessary under applicable law or an agreement.

Service providers that process personal data on Bora's behalf are expected to process it only for authorized purposes and to maintain appropriate confidentiality, privacy and security safeguards. Bora applies proportionate due diligence and contractual controls to material processors and vendors.

11. INTERNATIONAL AND CROSS-BORDER TRANSFERS

In some circumstances, personal data may be accessed, hosted, processed or stored outside Ghana, including through international custodians, counterparties, financial infrastructure, professional advisers or technology providers. Bora will take reasonable steps to ensure that cross-border processing is conducted in accordance with applicable law and subject to appropriate contractual, organizational, technical or regulatory safeguards. Where required, consent or regulatory approval will be obtained before a transfer.

12. DATA SECURITY

Bora implements reasonable technical and organizational measures designed to preserve the confidentiality, integrity and availability of personal data and to protect it against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, misuse or other unlawful processing.

- role-based and business-need access controls;
- authentication and password controls;
- network, endpoint and email security;
- encryption where appropriate;
- physical access controls and secure storage;
- controlled backup and recovery arrangements;
- logging and monitoring;
- cybersecurity and vulnerability-management controls;
- employee confidentiality obligations and training;
- vendor due diligence and contractual safeguards;
- incident and breach-response procedures; and

- business continuity and disaster-recovery arrangements.

No electronic or physical system can be guaranteed to be completely secure. Bora therefore does not represent that security risk can be eliminated, but it maintains controls proportionate to the nature, scale and sensitivity of the processing and its regulatory obligations.

13. PERSONAL DATA BREACHES

Bora maintains procedures to identify, contain, investigate, assess, remediate, document and escalate actual or suspected personal-data breaches. Where required by applicable law or regulatory requirements, Bora will notify the relevant authority and/or affected individuals. Any person who becomes aware of an actual or suspected compromise of personal data relating to Bora should promptly contact the Data Protection Supervisor or Bora through an official channel.

14. DATA RETENTION

Bora retains personal data only for as long as reasonably necessary for the purpose for which it was collected, subject to legal, regulatory, contractual, accounting, tax, evidentiary and legitimate business requirements. Because Bora operates in a regulated financial services environment, some records must be retained after the end of a client relationship.

AML/CFT/CPF and related records will ordinarily be maintained for at least the minimum statutory or regulatory period applicable to Bora, which may include at least six years after termination of a business relationship or completion of a transaction where applicable. Records may be retained longer where required by a regulator, litigation hold, investigation, tax requirement, contractual claim or the need to establish, exercise or defend legal rights.

At the end of the applicable retention period, personal data will be securely destroyed, deleted, anonymized or otherwise disposed of in accordance with Bora’s records-management and retention procedures.

15. ACCURACY AND DATA QUALITY

Bora takes reasonable steps to keep personal data accurate, complete and current where necessary. Clients and other data subjects should promptly notify Bora of changes to their personal information. Bora may periodically request refreshed KYC, identification, contact, financial or other information to meet regulatory requirements and maintain reliable records.

16. DATA SUBJECT RIGHTS

Subject to the Data Protection Act, 2012 (Act 843) and other applicable laws, an individual may have rights including the right to:

- be informed about the collection and use of personal data;
- request confirmation whether Bora processes personal data about the individual;
- request access to personal data held by Bora;
- request correction or rectification of inaccurate or incomplete personal data;
- object to certain processing;
- request prevention of processing that causes or is likely to cause unwarranted damage or distress where the law provides for such a right;
- object to processing for direct marketing;
- withdraw consent where processing is based on consent;
- request blocking, erasure or destruction where legally applicable;
- challenge or obtain appropriate safeguards in relation to certain automated decisions where applicable;
- seek remedies where data-protection rights have been infringed; and
- lodge a complaint with the Data Protection Commission.

These rights are not absolute. Bora may lawfully decline or limit a request where it is required or permitted to continue processing, including to meet AML/CFT/CPF, securities regulation, tax, litigation, fraud-prevention, recordkeeping or other legal obligations.

17. EXERCISING YOUR RIGHTS

Requests concerning personal data should be submitted to Bora’s Data Protection Supervisor using an official Bora contact channel. Bora may require sufficient information to verify identity and authority before acting on a request. Valid requests will be handled within the period required by applicable law. Where Bora cannot fulfil a request in whole or in part, it will provide an explanation where legally permitted.

18. DATA PROTECTION SUPERVISOR

Bora has designated a trained Data Protection Supervisor ("DPS") to coordinate data-protection compliance, support awareness and controls, maintain relevant privacy records, facilitate data-subject rights, oversee breach management and serve as a point of contact for privacy matters.

Data Protection Supervisor
Bora Capital Advisors LTD
No. 3 Dano Court, Boundary Road, East Legon, Accra
Email: info@boradvisors.com
Telephone: +233 50 771 2343

19. COMPLAINTS TO THE DATA PROTECTION COMMISSION

Bora encourages individuals to raise privacy concerns directly with the Company so that they can be investigated and addressed. This does not limit the right of an individual to lodge a complaint with the Data Protection Commission of Ghana or to pursue any other remedy available under applicable law.

20. DIRECT MARKETING

Where permitted by law, Bora may send information about investment products, services, publications, events or market updates. Where consent is required, direct marketing will be based on appropriate consent. An individual may opt out at any time using an unsubscribe mechanism where available or by contacting Bora. An opt-out does not prevent operational, transaction, regulatory, legal or service communications.

21. COOKIES AND SIMILAR TECHNOLOGIES

Bora's website may use cookies and similar technologies to support security, functionality, preferences, performance and analytics. Cookies are small data files placed on or associated with a device or browser. Depending on the website configuration, Bora may use:

- Strictly Necessary Cookies – required for security and core website operation.
- Functional Cookies – used to remember preferences and support enhanced functions.
- Performance and Analytics Cookies – used to understand website use and improve performance.
- Marketing Cookies – where implemented and lawfully permitted, used to measure or support marketing activity.

Where required, the website will provide appropriate controls to accept, reject or manage non-essential cookies. Browser settings may also be used to control cookies. Disabling certain cookies may affect website functionality. Bora should maintain a separate Cookie Notice where the website uses non-essential cookies or third-party analytics/advertising tools.

22. THIRD-PARTY WEBSITES AND SERVICES

Bora's website may contain links to websites or services operated by third parties. Bora does not control and is not responsible for the privacy, security, availability or content of third-party services. Users should review the privacy notices and terms of those third parties before providing information to them.

23. ELECTRONIC COMMUNICATIONS AND RECORDKEEPING

Bora maintains policies and controls governing business communications conducted electronically. Clients and other persons dealing with Bora should use the communication channels designated or approved by Bora for the relevant purpose.

Business communications may be retained, monitored, reviewed, retrieved and produced where necessary for securities regulation, supervision, recordkeeping, audit, dispute resolution, cybersecurity, fraud prevention and legitimate business purposes. Relevant electronic communications may form part of Bora's official books and records and may be preserved to maintain a complete and reliable audit trail.

24. CHILDREN AND MINORS

Bora's website and investment services are not generally directed at children. Where personal data relating to a minor is lawfully processed in connection with an investment or another legitimate relationship, Bora will take appropriate steps to comply with applicable requirements, including the involvement or consent of a parent, guardian or other legally authorised person where required.

25. AUTOMATED DECISION-MAKING

Bora may use technology to assist with screening, fraud prevention, transaction monitoring, compliance reviews and risk assessments. Where a decision producing significant legal or similarly material effects is made solely through automated processing, Bora will apply applicable legal safeguards. Bora does not ordinarily rely solely on automated processing for material client-suitability or regulatory decisions without appropriate controls and human oversight.

26. CONFIDENTIALITY

In addition to data-protection obligations, client and business information may be subject to contractual, fiduciary, professional and regulatory duties of confidentiality. Employees, contractors and service providers with access to confidential or personal information are required to handle such information consistently with applicable confidentiality, privacy, security and need-to-know requirements.

27. CHANGES TO THIS PRIVACY POLICY

Bora may amend this Privacy Policy to reflect changes in law or regulation, regulatory guidance, products or services, technology, processing activities or privacy practices. The current version will be published on the website with its effective or revision date. Where a change materially affects the manner in which personal data is processed, Bora will take reasonable steps to provide appropriate notice.

28. CONTACT US

General Enquiries
Bora Capital Advisors LTD
No. 3 Dano Court, Boundary Road, East Legon, Accra
Telephone: +233 50 771 2343
Email: info@boradvisors.com
Website: https://www.boradvisors.com

Privacy Enquiries
Data Protection Supervisor
Email: info@boradvisors.com