

A scenic view of a mountain range with a forest in the foreground and a yellow vertical bar on the left side. The mountains are rugged and rocky, with a forest of evergreen trees in the foreground. The sky is blue with some clouds. A yellow vertical bar is on the left side of the image.

# Politics of Privacy

**ZAMBELLI INTERNATIONAL CONSULTING LLC**

# **POLITIC Of PRIVACY of ZAMBELLI International Consulting LLC & WISE UNIVERSAL Group Holding Team**

*Last Updated: May 2, 2025*

## **Introduction**

At ZAMBELLI International Consulting LLC, we value your privacy and are committed to protecting your personal data while you interact with our website, [www.jzambelliconsulting.com](http://www.jzambelliconsulting.com) (the "Website"), hosted on the WIX platform. This section outlines how we process and secure your data when you use our Website, including any personal data that may be collected, stored, or transmitted as part of your interactions with our services.

By using our Website, you agree to the collection, use, and processing of your data as described in these Terms and Conditions of Use, which are in compliance with applicable data protection laws and regulations, including but not limited to the European Union's General Data Protection Regulation (GDPR), the United States' Electronic Communications Privacy Act (ECPA), and relevant laws and regulations of other jurisdictions.

We take your privacy seriously and use commercially reasonable efforts to protect your personal information by implementing appropriate technical, organizational, and physical safeguards to prevent unauthorized access, disclosure, alteration, or destruction of your personal data.

This Privacy Policy should be read in conjunction with our Terms and Conditions of Use and the cookie policies, as it serves as an essential guide to understanding how we protect and process your data. It also provides a comprehensive outline of your rights in relation to your personal information when using our Website. We encourage you to review this information carefully to ensure you are fully informed about how your data is handled.

If you have any questions or concerns about how your personal data is being processed or about the security measures we take, please do not hesitate to contact us using the contact details provided at the end of this document.

*ZAMBELLI International Consulting LLC and WISE UNIVERSAL Group (hereinafter collectively referred to as " ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP ," "we," "us," or "our") are committed to safeguarding your privacy and ensuring the security and lawful processing of your personal data and proprietary information. This Privacy Policy is intended to transparently explain how we collect, use, store, transfer, and protect your personal information, in strict compliance with binding international, regional, and domestic data protection frameworks.*

*We process personal data in accordance with the highest standards of data governance, applying the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality.*

*The scope of our compliance obligations and operational controls includes, but is not limited to:*

- The General Data Protection Regulation (EU) 2016/679 (GDPR) — protecting the rights and freedoms of natural persons in the European Union with respect to the processing of personal data.*
- The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 — governing the lawful processing of personal data in the United Kingdom.*
- The California Consumer Privacy Act of 2018 (CCPA) and the California Privacy Rights Act of 2020 (CPRA) — establishing data privacy rights for California residents and obligations for covered businesses.*
- The Delaware Online Privacy and Protection Act (DOPPA) — applicable to the collection of personal information of Delaware residents.*
- The New York SHIELD Act (Stop Hacks and Improve Electronic Data Security Act) — requiring data security measures for New York residents' private information.*

- *The Florida Information Protection Act (FIPA) — setting forth privacy and data breach notification requirements applicable in Miami and across Florida.*
- *Relevant United Nations Guidelines on the Protection of Privacy and Transborder Flows of Personal Data.*
- *Applicable international trade secret protections, including the Defend Trade Secrets Act of 2016 (United States) and the Trade Secrets (Enforcement, etc.) Regulations 2018 (United Kingdom).*

*Additionally, we adhere to obligations under the eIDAS Regulation (EU No 910/2014) on electronic identification and trust services, as well as the Directive 2000/31/EC governing e-commerce and information society services.*

#### *Purpose and Lawfulness of Processing*

*Your personal data is processed for specific, explicit, and legitimate purposes, including but not limited to:*

- *The execution of pre-contractual and contractual obligations between you and ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP .*
- *Compliance with legal and regulatory requirements under U.S., EU, UK, and international law.*
- *The protection of our legitimate interests, including business operations, fraud prevention, network and information security, and the safeguarding of trade secrets and intellectual property.*
- *The management and administration of our investment projects, consulting services, and corporate holdings.*
- *Direct marketing and communication activities, based on your consent where legally required.*

*We ensure that all processing activities are grounded in at least one lawful basis as defined under applicable data protection laws, including consent, contractual necessity, legal obligation, vital interests, public task, or legitimate interests.*

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*International Data Transfers and Binding Corporate Rules*

*Given the global scope of our operations, your personal data may be transferred to and processed in jurisdictions outside of your country of residence, including but not limited to the United States and the United Kingdom.*

*We ensure that all international data transfers are conducted in compliance with the GDPR, UK GDPR, and other applicable laws by implementing appropriate safeguards, including:*

- *Standard Contractual Clauses (SCCs) approved by the European Commission and the UK Information Commissioner's Office.*
- *Binding Corporate Rules (BCRs) where applicable, ensuring intra-group compliance.*
- *Transfers based on adequacy decisions where the destination country provides an adequate level of protection.*

*All cross-border data transfers are subject to rigorous security controls and legal protections designed to preserve your rights and protect your information from unauthorized access, alteration, or disclosure.*

#### *Data Subject Rights under GDPR, UK GDPR, and Other Laws*

*You, as a data subject, are entitled to exercise the following rights under applicable privacy legislation:*

- *Right of Access: Obtain confirmation as to whether your personal data is being processed and, if so, access to that data.*
- *Right to Rectification: Request correction of inaccurate or incomplete personal data.*
- *Right to Erasure ("Right to be Forgotten"): Request deletion of your personal data where legally permissible.*
- *Right to Restriction of Processing: Limit processing under certain conditions.*
- *Right to Data Portability: Receive your personal data in a structured, commonly used, and machine-readable format and transmit it to another controller.*
- *Right to Object: Object to processing based on legitimate interests, direct marketing, or profiling.*

- *Right to Withdraw Consent: Where processing is based on consent, you have the right to withdraw that consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.*
- *Right to Lodge a Complaint: Submit a complaint to a supervisory authority such as the Information Commissioner's Office (ICO) in the UK, the Data Protection Authority in your EU member state, or the Federal Trade Commission (FTC) in the United States.*

*To exercise your rights, please contact our Data Protection Officer (DPO) at:  
Email: [info@zambelliconsulting.com](mailto:info@zambelliconsulting.com)*

*Please read this Policy carefully and in full before providing your personal information or using our services. Your use of our website and engagement with ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP signifies your agreement to this Privacy Policy and our lawful processing of your personal data in accordance with applicable laws.*

## **Terms of Service for ZAMBELLI INTERNATIONAL CONSULTING LLC**

**ZAMBELLI INTERNATIONAL CONSULTING LLC (hereinafter referred to as "ZAMBELLI") is committed to maintaining the privacy and confidentiality of your personal data. We will never share or disclose personal information that can identify the user to third parties without obtaining prior consent. However, in certain cases, collaborations may be made with other professionals or entities, and in such instances, the user's consent will be required, including clear information regarding the identity of the collaborating entity and the specific purpose of the collaboration. These collaborations will be conducted with the highest security standards in place, in compliance with applicable data protection laws and regulations.**

**In line with international financial regulations such as the Markets in Financial Instruments Directive (MiFID II), the Financial Action Task Force (FATF) standards, and the UK Financial Conduct Authority (FCA) regulations, we ensure that our services align with EU/UK/US operational footprints. This includes observing all relevant financial conduct standards, privacy regulations, and security measures for handling personal and financial data.**

**Remarketing Functionality:**

We may use remarketing tools to target users who have previously visited our website. This feature allows us to deliver personalized messages to users based on their prior interactions with our website. Through this, we can re-engage users by showing them relevant advertisements on third-party platforms. By using our website, you agree to the collection of this information for remarketing purposes. This collection process will adhere to privacy regulations and will be used solely for the intended remarketing objectives.

**Social Media Interactions:**

Certain services on our website may allow interactions with social networks or other external platforms. These interactions, along with any data collected through such interactions, will be subject to the user's privacy settings within each social media platform. Even if a user does not engage with these services, it is possible that non-identifiable data related to their web traffic may be collected when interacting with the website, especially when third-party services are used.

**Non-Identifiable Data Collection:**

While browsing this website, we may collect non-personally identifiable data, such as IP addresses, approximate geographic location, usage data, and browsing patterns, which cannot be used to directly identify individual users. This data may be analyzed to help us improve website functionality, user experience, and service offerings. This data may be collected through third-party analytics tools such as Google Analytics, which helps us monitor site performance, user behavior, and trends.

**Data Security and Confidentiality:**

ZAMBELLI INTERNATIONAL CONSULTING LLC is fully committed to securing the personal and professional data of its users, investment groups, companies, and clients. We implement appropriate technical, administrative, and organizational measures to safeguard such data from unauthorized access, alteration, loss, or misuse. This includes ensuring compliance with applicable data protection

regulations such as the General Data Protection Regulation (GDPR) and relevant laws governing data privacy in the jurisdictions where we operate.

This website is secured using SSL encryption, which ensures that all data transmitted between the user and our server is encrypted, guaranteeing the confidentiality of the data. However, while we strive to maintain robust security measures, ZAMBELLI cannot guarantee the absolute protection of data over the Internet and disclaims responsibility for data breaches caused by fraudulent third-party access.

**Confidentiality of Data Processing:** ZAMBELLI INTERNATIONAL CONSULTING LLC ensures that any person authorized to process client data (including staff, collaborators, and third-party service providers) will be under a strict confidentiality obligation, either through a contractual or legal commitment. In the event of a security incident that compromises the confidentiality of client data, we will notify the client without undue delay and provide timely information regarding the incident as it becomes available, or upon request by the client.

**Accuracy of Data:**

As a user of ZAMBELLI's services, you are solely responsible for ensuring the accuracy and truthfulness of the personal data you provide to us. ZAMBELLI INTERNATIONAL CONSULTING LLC disclaims responsibility for any errors or inaccuracies in the data provided. Users guarantee the validity, authenticity, and completeness of their data and agree to promptly update this information as necessary. Furthermore, users agree to provide accurate and complete information when completing any forms or subscriptions on our website.

**Acceptance and Consent:**  
By using our services, users acknowledge that they have been informed of the data protection terms outlined in this privacy policy. By continuing to use our website or engaging with our services, users explicitly consent to the collection, processing, and handling of their personal data in accordance with this privacy policy and the purposes described herein.

***1. Data Controller and Corporate Legal Identity***

*The Data Controllers for the purposes of applicable data protection laws, including but not limited to the EU General Data Protection Regulation (Regulation (EU)*

2016/679) ("GDPR"), the UK Data Protection Act 2018, and other relevant statutes, are:

**ZAMBELLI INTERNATIONAL CONSULTING LLC**

- *Principal Address: 16192 Coastal Highway, Lewes, Delaware 19958, Sussex County, United States.*
- *State Registration Number: 3592130 (Registered in the State of Delaware).*
- *BOIR ID Number: 50000002396221 (Registered with the U.S. Financial Crimes Enforcement Network - FinCEN).*
- *Registered Agent: Counsel & BA (PLS) José Zambelli, Chief Executive Officer (CEO), Director & Chief Legal Officer (CLO).*
- *United Nations Global Marketplace (UNGM) Registration Number: 771827.*
- *EU Investor User ID: N007JP87.*
- *Tel :*

**WISE UNIVERSAL GROUP Ltd**

- *Jurisdiction of Incorporation: England and Wales.*
- *Company Registration Number: 14615225.*
- *Registered Office: 128 City Road, EC1V 2NX, London, United Kingdom.*

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**Protected Proprietary and Confidential Information**

*The protected and confidential information covered under this Privacy Policy and relevant trade secret laws includes, but is not limited to:*

- *Emails and Attachments transmitted from the domain [@jzambelliconsulting.com](mailto:@jzambelliconsulting.com), whether sent or received, are considered privileged communications and are subject to protection under applicable data privacy, electronic communications, and trade secret statutes.*
- *Corporate Documents, Legal Instruments, and Materials authored, signed, or issued under the authority of Counsel & BA (PLS) José Zambelli, in his capacity as CEO, Director, and CLO of ZAMBELLI INTERNATIONAL CONSULTING LLC, are protected under U.S. corporate governance laws, professional legal privilege, and international commercial confidentiality principles.*
- *Proprietary Information and Know-How pertaining to the internal operations, investment projects, strategic plans, financial arrangements, and commercial*

*negotiations of WISE UNIVERSAL GROUP Ltd, which constitute trade secrets under the UK Trade Secrets (Enforcement, etc.) Regulations 2018 and the U.S. Defend Trade Secrets Act of 2016.*

#### ***Legal Framework and Compliance***

***ZAMBELLI INTERNATIONAL CONSULTING LLC has implemented this website and its data processing activities in full compliance with the following legal instruments:***

- ***Regulation (EU) 2016/679 (GDPR): On the protection of natural persons with regard to the processing of personal data and on the free movement of such data.***
- ***Regulation (EU) No 910/2014 (eIDAS Regulation): On electronic identification and trust services for electronic transactions in the internal market.***
- ***Directive 2000/31/EC: On certain legal aspects of information society services, in particular electronic commerce, in the Internal Market (commonly known as the e-Commerce Directive).***
- ***Ley de Servicios de la Sociedad de la Información y Comercio Electrónico (LSSICE or LSSI), Spain: Applicable to electronic communications and commercial communications within the European Union.***

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#### ***Identity and Responsibility for Data Processing***

##### ***Data Controller:***

- ***Name: José Zambelli***
- ***Position: CEO, Director & CLO***
- ***Commercial Entity: ZAMBELLI INTERNATIONAL CONSULTING LLC***
- ***Principal Place of Business: 16192 Coastal Highway, Lewes, Delaware 19958, Sussex County, United States.***
- ***Administrative Management & Holding Organization: WISE UNIVERSAL GROUP Ltd***
  - ***Registered in England and Wales: Company Number 14615225***
  - ***Registered Office: 128 City Road, EC1V 2NX, London, United Kingdom***

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#### ***A. Personal Data We Collect***

*In the course of providing our services, managing our corporate projects, and operating this website, ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP may collect and process the following categories of personal data:*

- *Identification Data: This includes your full name, surname, mailing address, email address, telephone number, and any government-issued identification data when required for compliance purposes (e.g., Know Your Customer (KYC) checks).*
- *Professional and Employment Data: This includes your job title, employing company, business address, country of professional residence, and industry sector, where applicable.*
- *Financial and Economic Data: In specific cases related to our investment project management, financial consulting, or transactional services, we may collect and process financial data such as bank account information, investment portfolios, transaction history, tax identification numbers, and other financial or economic details necessary for contract execution and compliance with anti-money laundering (AML) regulations.*
- *Technical and Browsing Data: This includes your IP address, browser type and version, device identifiers, operating system, the pages visited on our website, the time and date of your visit, approximate geographic location, and other analytics data, collected via cookies and tracking technologies, in compliance with applicable ePrivacy laws.*
- *Voluntary Information: Any other information that you voluntarily provide to us through web forms, electronic communications, email correspondence, or participation in events, webinars, and consultation sessions.*

***Special Note on Data Relating to Minors:***

*We do not knowingly collect or process personal data from individuals under the age of thirteen (13) without obtaining verifiable parental or guardian consent, as required by applicable child data protection laws including the U.S. Children's Online Privacy Protection Act (COPPA). In no case do we knowingly collect sensitive or financial data pertaining to minors. If you are under the age of 13, please do not register or provide any personal data without parental consent.*

### ***B- Security of Processing and Protection of Trade Secrets***

***At ZAMBELLI & WISE, the security and confidentiality of your personal data and our proprietary corporate information are of paramount importance. We have implemented a comprehensive information security management system (ISMS) aligned with leading international standards, including ISO/IEC 27001 and NIST Special Publication 800-53.***

#### ***Our Data Protection Measures Include:***

- Encryption: All personal data transmitted electronically is encrypted using Transport Layer Security (TLS) protocols. Data stored at rest is protected through Advanced Encryption Standard (AES-256).***
- Access Controls: Strict role-based access control (RBAC) mechanisms limit access to personal data and confidential business information to authorized personnel only, under the principle of least privilege.***
- Data Anonymization and Pseudonymization: Applied where feasible, to minimize risks in case of data breaches.***
- Incident Response: A formal data breach response plan is in place in compliance with GDPR Articles 33 and 34 and U.S. breach notification laws, including the New York SHIELD Act and the California Data Breach Notification Statute.***

#### ***Protection of Trade Secrets:***

***In addition to personal data protection, we maintain robust safeguards for the protection of trade secrets and proprietary business information, consistent with:***

- The Defend Trade Secrets Act of 2016 (U.S.)***
- The Trade Secrets (Enforcement, etc.) Regulations 2018 (UK)***
- Relevant European Union directives and international best practices.***

***This includes legal, technical, and organizational measures designed to prevent unauthorized disclosure, acquisition, use, or misappropriation of sensitive internal documentation, investment strategies, financial models, client records, and intellectual property assets.***

***Any unauthorized access to, or disclosure of, our trade secrets is subject to civil and criminal penalties under applicable laws.***

#### ***4. Retention Period and Recordkeeping Obligations***

*We retain personal data only for as long as is necessary to fulfill the purposes for which it was collected, including the satisfaction of legal, regulatory, contractual, and legitimate business requirements.*

***Retention Periods:***

- *Identification and Contact Data: Retained for a minimum period of five (5) years from the end of our business relationship, in compliance with anti-money laundering (AML) and counter-terrorist financing (CTF) regulations, including the U.S. Bank Secrecy Act (BSA) and the EU 5th AML Directive.*
- *Financial and Transaction Data: Retained for seven (7) to ten (10) years in accordance with tax, financial reporting, and audit obligations under U.S. Internal Revenue Service (IRS) regulations, the UK Companies Act 2006, and international financial compliance rules.*
- *Technical and Browsing Data: Retained for a period of twelve (12) months from the date of collection unless anonymized for statistical purposes.*
- *Voluntary Information and Communications: Retained for the duration of the business relationship and up to three (3) years thereafter, subject to applicable limitation periods for legal claims.*

***Recordkeeping Obligations:***

*As corporate entities operating across multiple jurisdictions, ZAMBELLI & WISE are subject to statutory recordkeeping obligations, including but not limited to:*

- *U.S. Securities and Exchange Commission (SEC) rules for investment-related records.*
- *UK Financial Conduct Authority (FCA) requirements for financial services firms.*
- *General commercial law obligations under the Delaware General Corporation Law (DGCL), UK Companies Act, and EU regulations.*
- *Electronic communications retention under the EU eIDAS Regulation and the U.S. Electronic Communications Privacy Act (ECPA).*

*We implement automated retention and disposal schedules to ensure compliance with these obligations while respecting your data protection rights.*

*Note: When the applicable retention period expires, your personal data will be securely deleted, anonymized, or destroyed using methods consistent with*

*international data destruction standards, including NIST SP 800-88 and ISO/IEC 27040.*

### ***3. Purpose of Data Processing***

*ZAMBELLI & WISE collect and process your personal data strictly for specified, explicit, and legitimate purposes, in accordance with the principles of lawfulness, fairness, and transparency established under the General Data Protection Regulation (GDPR), the UK GDPR, the California Consumer Privacy Act (CCPA), and other applicable legal frameworks. We ensure that your personal data is not further processed in a manner that is incompatible with these purposes.*

*Your personal data will be used for the following lawful purposes:*

#### ***3.1 Managing and Administering Your Relationship with ZAMBELLI & WISE***

- Establishing and maintaining contractual or pre-contractual relations with clients, investors, partners, and suppliers.*
- Processing applications and onboarding participants in our investment, consulting, and corporate management programs.*
- Facilitating due diligence checks, including Know Your Customer (KYC) and Anti-Money Laundering (AML) verifications.*
- Maintaining up-to-date and accurate records in our client and stakeholder databases.*

#### ***3.2 Responding to Inquiries and Information Requests***

- Handling your queries, requests for information, and correspondence, whether submitted through our website, email, or other communication channels.*
- Scheduling meetings, consultations, webinars, or project discussions initiated by your requests.*
- Providing you with requested reports, financial insights, or documentation related to our services and operations.*

#### ***3.3 Managing Your Participation in Investment Projects and Programs***

- Processing personal and financial data to evaluate your eligibility and suitability for investment participation, in accordance with applicable securities and investment laws.*

- *Administering investment transactions, project documentation, funding disbursements, and performance tracking.*
- *Ensuring compliance with jurisdiction-specific legal obligations such as U.S. Securities and Exchange Commission (SEC) requirements, UK Financial Conduct Authority (FCA) guidelines, and relevant EU financial services regulations.*

### ***3.4 Sending Informational and Commercial Electronic Communications***

- *Communicating with you regarding updates, newsletters, market reports, corporate announcements, and invitations to events or programs, where you have provided explicit consent.*
- *Delivering promotional content and targeted marketing communications, in compliance with the EU ePrivacy Directive (2002/58/EC), the CAN-SPAM Act (United States), and other applicable electronic communications laws.*
- *Allowing you to manage your subscription preferences and exercise your right to opt-out from direct marketing communications at any time.*

### ***3.5 Complying with Legal and Regulatory Obligations***

- *Fulfilling mandatory legal obligations under international, regional, and domestic law, including tax reporting, financial audits, and recordkeeping requirements.*
- *Complying with statutory obligations under data protection laws (e.g., GDPR, CCPA), financial regulations (e.g., AML/CTF laws), and corporate law (e.g., Delaware General Corporation Law, UK Companies Act 2006).*
- *Responding to lawful requests from regulatory authorities, law enforcement agencies, or courts in accordance with due process.*

### ***3.6 Protecting Our Legitimate Interests***

- *Safeguarding the confidentiality, integrity, and availability of our proprietary business information and trade secrets, in line with the Defend Trade Secrets Act (DTSA), the UK Trade Secrets Regulations, and international best practices.*
- *Implementing fraud detection and prevention mechanisms to protect our business and stakeholders from financial crime and security threats.*

- *Enhancing the quality, safety, and security of our services and digital platforms through analytics, monitoring, and cybersecurity measures.*
- *Asserting, exercising, or defending legal claims in the context of legal proceedings, arbitration, or regulatory investigations.*

***Lawful Basis for Processing:***

***Each purpose outlined above is supported by a lawful basis for processing under applicable data protection law, which may include:***

- *Your explicit consent (where required by law);*
- *The necessity for the performance of a contract or to take steps at your request prior to entering into a contract;*
- *Compliance with our legal obligations;*
- *The pursuit of our legitimate interests, provided that such interests are not overridden by your rights and freedoms.*

***4. Protection of Trade Secrets and Confidentiality***

***At ZAMBELLI & WISE, we recognize that the protection of trade secrets and confidential business information is critical to maintaining trust, competitive advantage, and legal compliance. We are firmly committed to safeguarding all confidential data accessed or exchanged in the course of our business relationships.***

***Our Commitments Include:***

- *Implementing technical security measures such as encryption, secure servers, access controls, and intrusion detection systems to maintain the confidentiality, integrity, and availability of sensitive information in accordance with international standards, including ISO/IEC 27001 and NIST SP 800-53.*
- *Applying organizational safeguards such as employee confidentiality agreements, internal policies, staff training on trade secret protection, and role-based data access restrictions.*
- *Enforcing legal protections through binding non-disclosure agreements (NDAs), confidentiality clauses in our contracts, and by invoking national and international trade secret laws such as:*

- *The Defend Trade Secrets Act (DTSA) of 2016 (United States)*
- *The EU Trade Secrets Directive (2016/943)*
- *The UK Trade Secrets (Enforcement, etc.) Regulations 2018*

***Disclosure Limitations:***

***We do not disclose, transfer, or permit access to your confidential information or our proprietary trade secrets without:***

- *Your prior written consent, or*
- *A valid legal obligation imposed by competent judicial or governmental authorities, in which case disclosures are made in strict compliance with applicable law and subject to protective measures where allowed.*

***Unauthorized access to, or misappropriation of, confidential information may result in civil liability, injunctive relief, and criminal prosecution under applicable trade secret and intellectual property laws.***

***5. International Data Transfers and Third-Party Disclosures***

***Given the global nature of ZAMBELLI & WISE's operations, your personal data and confidential information may be transferred internationally, including to jurisdictions that may not provide the same level of data protection as your home country.***

***International Data Transfers***

- ***Data Transfers to the United States and United Kingdom: Data processed by ZAMBELLI International Consulting LLC (Delaware, USA) and WISE UNIVERSAL GROUP Ltd (UK) is subject to the data protection frameworks applicable in these jurisdictions.***
- ***EU to Third Country Transfers: Where we transfer personal data from the European Economic Area (EEA) or the United Kingdom to third countries, we ensure adequate protection by implementing appropriate safeguards, including:***
  - *European Commission Standard Contractual Clauses (SCCs)*
  - *UK International Data Transfer Agreement (IDTA)*
  - *Binding Corporate Rules (BCRs), where applicable.*
  - *Additional technical, organizational, and contractual measures in line with the European Data Protection Board (EDPB) recommendations.*

### *Third-Party Disclosures*

*We may disclose personal data to trusted third parties, only where necessary and always subject to appropriate data protection agreements:*

- *Service Providers: Including IT hosting, data analytics, financial institutions, and professional advisors who act as processors or sub-processors on our behalf.*
- *Regulatory Bodies and Law Enforcement: To comply with legal obligations, prevent fraud, protect security, or respond to lawful government requests, subpoenas, or court orders.*
- *Corporate Transactions: In connection with mergers, acquisitions, divestitures, or corporate restructuring, provided that such transfers are made in compliance with applicable privacy laws.*

*We do not sell your personal data to third parties, nor do we allow unauthorized use of confidential information.*

### *6. Rights of Data Subjects and Methods of Exercising Those Rights*

*Under applicable data protection laws, you have specific rights in relation to the personal data we process about you. ZAMBELLI & WISE uphold these rights and provide mechanisms for you to exercise them effectively.*

*Your Rights Include:*

- *Right of Access: You have the right to obtain confirmation as to whether your personal data is being processed, and to access such data, in accordance with GDPR Article 15 and equivalent provisions under the UK GDPR and CCPA.*
- *Right to Rectification: You may request the correction of inaccurate or incomplete personal data (GDPR Article 16).*
- *Right to Erasure (Right to Be Forgotten): Under certain conditions, you may request the deletion of your personal data (GDPR Article 17), subject to our legal and regulatory retention obligations.*
- *Right to Restriction of Processing: You can request that we restrict processing where contestation or legal grounds are applicable (GDPR Article 18).*

- *Right to Data Portability: Where applicable, you may receive your personal data in a structured, commonly used, and machine-readable format, and transmit it to another controller (GDPR Article 20).*
- *Right to Object: You have the right to object, on grounds relating to your particular situation, to processing carried out on the basis of our legitimate interests, including profiling (GDPR Article 21).*
- *Right to Withdraw Consent: Where processing is based on your consent, you may withdraw it at any time, without affecting the lawfulness of processing based on consent before its withdrawal.*
- *Rights under CCPA: If you are a California resident, you have additional rights, including the right to opt-out of the sale of personal information, the right to know about the categories and specific pieces of personal data collected, and the right to non-discrimination for exercising your privacy rights.*

***Methods of Exercising Your Rights:***

***You may exercise your rights by submitting a written request to our Data Protection Officer (DPO) or Legal Department at:***

***Email: [privacy@jzambelliconsulting.com](mailto:privacy@jzambelliconsulting.com)***

***Postal Address (U.S.):***

***ZAMBELLI International Consulting LLC***

***16192 Coastal Highway, Lewes, Delaware 19958, Sussex County, USA***

***Postal Address (UK):***

***WISE UNIVERSAL GROUP Ltd***

***128 City Road, EC1V 2NX, London, United Kingdom***

***We aim to respond to valid requests within one (1) month from receipt, as mandated by the GDPR and UK GDPR, and within applicable timelines under the CCPA and other jurisdictions.***

***If you are unsatisfied with our response, you have the right to lodge a complaint with the supervisory authority:***

- ***For EU residents: Your local Data Protection Authority.***
- ***For UK residents: The Information Commissioner's Office (ICO).***
- ***For California residents: The California Attorney General's Office.***

**5. Legal Basis for Processing**

We process your personal data based on the following legal grounds, in compliance with applicable data protection laws and regulations, including but not limited to the General Data Protection Regulation (GDPR), the California Consumer Privacy Act (CCPA), and other relevant national and international data protection laws:

- 1. Your Explicit Consent:** We may process your personal data where you have explicitly consented to such processing for one or more specific purposes, such as subscribing to our newsletters, providing feedback, or agreeing to participate in our services. This consent can be withdrawn at any time, and we will provide you with a clear method to do so.
- 2. Performance of a Contract or Pre-Contractual Measures:** We process personal data when necessary for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into a contract. This includes situations where you engage with us for services, initiate business discussions, or request information about our offerings.
- 3. Compliance with a Legal Obligation:** We may process your personal data in order to comply with our legal obligations under applicable laws, including regulatory requirements, tax obligations, anti-money laundering (AML) laws, financial reporting, or other legal frameworks that mandate the collection and use of your data.
- 4. Our Legitimate Interests:** We process personal data based on our legitimate interests, which include, but are not limited to, the improvement of our services, the prevention of fraud, ensuring the security of our operations, or conducting market research. This processing will be done in a manner that respects your rights and freedoms, ensuring that our interests do not override your rights to privacy. If our legitimate interests require data processing that might impact your rights, we will perform a careful balancing test to ensure that your rights are safeguarded.

In all cases, we strive to ensure that the processing of your personal data aligns with the principles of necessity, proportionality, and transparency, and we will keep you informed about how your data is being used in accordance with our privacy policy.

## United States

In the United States, Zambelli International Consulting LLC and WISE UNIVERSAL Group operate in full compliance with the Electronic Signatures in Global and National Commerce Act (E-SIGN Act) and the Uniform Electronic Transactions Act (UETA), which collectively affirm that electronic records, contracts, and signatures possess full legal validity, enforceability, and evidentiary weight, irrespective of their digital form, provided they meet statutory requirements. In line with Section 7 and Section 8 of UETA, any transaction agreed upon electronically shall not be denied legal effect solely because it is conducted through electronic means, and parties' obligations to provide records in writing may be satisfied via electronically retained documents that are accessible, printable, and storable by recipients. Moreover, pursuant to Section 12 of UETA, records retained electronically are deemed compliant with legal retention requirements, including for evidentiary and audit purposes, provided they accurately reflect the original and remain accessible for reference. *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* also adhere strictly to the Electronic Communications Privacy Act (18 U.S.C. §§ 2510-2521), which protects against unauthorized interception or disclosure of electronic communications. Furthermore, we uphold the highest standards of confidentiality and trade secret protection as mandated by the Defend Trade Secrets Act of 2016 (DTSA) and aligned with the Uniform Trade Secrets Act (UTSA) as adopted by individual states, including New York, Florida (Miami), California, and Delaware. Our handling of sensitive information is conducted in compliance with U.S. Securities and Exchange Commission (SEC) regulations, Financial Industry Regulatory Authority (FINRA) rules, and Financial Crimes Enforcement Network (FinCEN) mandates, particularly concerning the prohibition of unauthorized disclosure or use of non-public offering materials and confidential financial data. Additionally, we observe protections under applicable U.S. Copyright Law, Patent Law, Database Rights, and International Intellectual Property Treaties, ensuring that intellectual assets and proprietary information are safeguarded across all jurisdictions in which we operate.

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* further ensure compliance with federal and state-level statutes governing the protection of sensitive business data, client information, and intellectual property. In adherence to the Federal Trade Secrets Protections and SEC Confidentiality Regulations, we strictly prohibit the unauthorized use, reproduction, distribution, or disclosure of any non-public information, offering materials, or proprietary business processes entrusted to us during the course of commercial engagements. All electronic communications and records processed by our platforms are protected in accordance with the Electronic Communication Privacy Act (ECPA), thereby preventing unlawful surveillance, interception, or exploitation of client communications. We maintain robust cybersecurity frameworks and enforce organizational safeguards designed to align with both U.S. federal law and international best practices, including encryption protocols, multi-factor authentication, secure access controls, and regular compliance audits.

Additionally, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* recognize and uphold the enforceability of electronic records and signatures under applicable state laws, including but not limited to Delaware General Corporation Law (DGCL), New York State Electronic Signatures and Records Act (ESRA), Florida Electronic Signature Act, and California Uniform Electronic Transactions Act (Cal. Civ. Code § 1633.1 et seq.), thus ensuring that all client transactions and agreements effected through our systems meet statutory standards for validity and legal effect. The protection of intellectual property extends to compliance with the United States Copyright Act (17 U.S.C.), the Patent Act (35 U.S.C.), Database Protection Laws, and relevant international treaties, including the Berne Convention and WIPO-administered agreements, thereby shielding our clients' creative works, inventions, and business databases from unauthorized exploitation worldwide.

Furthermore, we apply record retention and evidence standards under UETA Section 12 and applicable federal rules, affirming that electronically maintained records are valid for litigation, regulatory audits, and financial reporting purposes, provided they retain integrity, authenticity, and accessibility throughout their retention period. Our commitment extends to cross-border compliance

obligations, ensuring that all international data transfers are governed by lawful frameworks such as Standard Contractual Clauses (SCCs), Binding Corporate Rules (BCRs), and privacy shield mechanisms, where applicable, safeguarding the lawful processing of data across the United States, European Union, and United Kingdom. *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* further comply with the comprehensive regulatory framework established by the U.S. Securities and Exchange Commission (SEC), including but not limited to Rule 10b-5 under the Securities Exchange Act of 1934, which prohibits the use of any manipulative or deceptive device in connection with the purchase or sale of securities. We strictly enforce the confidentiality of material non-public information (MNPI) and ensure that no client, employee, or affiliate engages in insider trading, tipping, or unlawful disclosure in violation of federal securities laws. In adherence to SEC Regulation S-P (Privacy of Consumer Financial Information), we implement privacy policies and practices that restrict the sharing of nonpublic personal information (NPI) about our clients and investors, except as permitted by law or authorized by the data subject.

Additionally, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* uphold compliance with Regulation S-ID (Identity Theft Red Flags Rule), which requires financial institutions and creditors to develop and implement identity theft prevention programs. Our operations are further aligned with FINRA Rule 3110 (Supervision) and FINRA Rule 2210 (Communications with the Public), ensuring that all communications, advertisements, and promotional materials meet standards of fairness, balance, and disclosure as mandated for investment management activities. Records retention and reporting obligations are maintained in compliance with SEC Rule 17a-4, which mandates the preservation of certain records, including electronic communications, for specified durations and in formats that guarantee accessibility, authenticity, and integrity for regulatory examination and legal proceedings.

Moreover, in accordance with the Defend Trade Secrets Act (DTSA) of 2016 and applicable Uniform Trade Secrets Act (UTSA) provisions, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* strictly prohibit the misappropriation, disclosure, or unauthorized use of proprietary financial

models, investment strategies, client portfolios, and confidential business information. Our firm operates under robust anti-money laundering (AML) protocols, fulfilling obligations under the Bank Secrecy Act (BSA) and Financial Crimes Enforcement Network (FinCEN) regulations, including customer due diligence (CDD), suspicious activity reporting (SAR), and enhanced due diligence (EDD) measures for high-risk clients and cross-border transactions. Through the integration of these SEC and federal regulatory frameworks, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* affirm our unwavering commitment to lawful, ethical, and transparent business practices in all securities, investment, and financial advisory engagements globally.

By integrating these comprehensive legal safeguards, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* reaffirm our dedication to preserving client confidentiality, upholding trade secret integrity, securing intellectual assets, and ensuring the lawful and ethical processing of electronic records and communications in every jurisdiction we serve.

### **United Kingdom**

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* are fully committed to complying with a comprehensive suite of both U.S. federal regulations and United Kingdom laws to ensure the highest standards of transparency, security, and legal integrity in all aspects of our business operations. In line with U.S. federal laws, we adhere to the Securities and Exchange Commission (SEC) regulations, including Rule 10b-5 of the Securities Exchange Act of 1934, ensuring that no client, employee, or affiliate engages in any illegal activity such as insider trading, market manipulation, or misrepresentation. *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* also comply with the Electronic Signatures in Global and National Commerce Act (E-SIGN Act), which guarantees that electronic signatures and contracts are legally valid and enforceable in transactions involving interstate or foreign commerce, thereby protecting the integrity of electronic records. Additionally, we abide by the Defend Trade Secrets Act of 2016 (DTSA) and Uniform Trade Secrets Act (UTSA), safeguarding the confidentiality of proprietary data, investment strategies, and

trade secrets from unlawful use or disclosure. On the international stage, our operations are governed by the Foreign Account Tax Compliance Act (FATCA) and anti-money laundering (AML) regulations, ensuring that we maintain compliance with the Financial Crimes Enforcement Network (FinCEN) and Bank Secrecy Act (BSA) in preventing money laundering and financial fraud. Our policies also include ensuring compliance with FINRA, SEC Rule 17a-4, and anti-corruption measures under the Foreign Corrupt Practices Act (FCPA).

In the United Kingdom, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* fully respect and comply with the Financial Conduct Authority (FCA) regulations, which govern all financial services firms and their conduct in relation to clients, the markets, and their obligations towards investors and stakeholders. Our operations are aligned with the UK Bribery Act 2010, ensuring a strict anti-bribery and anti-corruption framework in place across all business activities, and we adhere to the Crime and Courts Act 2002, safeguarding against fraudulent activity in financial and corporate matters. Under Civil Procedure Rules (CPR), Article 31.4 clarifies the definition of "documents" as including electronic records such as emails, databases, word-processed documents, and metadata, which must be preserved in their integrity for legal compliance and evidence submission. This extends to the use of Electronic Communications Act 2000, which implements the EU Electronic Signatures Directive, ensuring the admissibility and legal enforceability of electronic signatures and certificates in UK courts. By adhering to these comprehensive legal frameworks across multiple jurisdictions, *ZAMBELLI & WISE* ensure the highest standards of data security, financial integrity, and legal compliance in our international operations, ensuring that all communications, transactions, and agreements are conducted with the utmost professionalism and legal rigor, while maintaining full transparency and protection for all parties involved.

## Europe

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* In accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, GDPR), Article 17 ("Right to be Forgotten") of the General Data

Protection Regulation (GDPR) of the European Union regarding the protection of personal and commercial data, , Zambelli International Consulting, with an established presence in France, acts as the data controller for the processing of personal data collected from users of its website and subscribers within the European Economic Area (EEA). Furthermore, in compliance with Regulation (EU) No 910/2014 on electronic identification and trust services for electronic transactions in the internal market (eIDAS Regulation), along with its corresponding implementing regulations (EU) 2015/1501 and (EU) 2015/1502, Zambelli International Consulting ensures that all electronic transactions, identification processes, and trust services adhere to the interoperability frameworks and minimum technical security standards mandated by EU law. In the conduct of its international legal and financial operations, Zambelli International Consulting also complies with enhanced due diligence obligations and transparency measures introduced by successive amendments to the EU legal framework, including the establishment of publicly accessible registers of beneficial ownership for companies, trusts, and other legal entities; the strengthening of the powers and information access rights of EU Financial Intelligence Units (FIUs); and the application of reinforced safeguards for financial transactions involving high-risk third countries. These measures collectively ensure the protection of natural persons in relation to the processing of personal data and uphold the principles of transparency, security, and lawful data transfer across EU and international markets, in full alignment with the free movement of data guaranteed under the GDPR.

### **United Arab Emirates**

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* is committed to compliance with all applicable federal laws in the United Arab Emirates (UAE) regarding electronic commerce, transactions, and data protection. In accordance with Federal Law No. 1 of 2006 on Electronic Commerce and Transactions, we ensure that electronic transactions, contracts, and communications hold legal validity and enforceability. Further, in line with Federal Law No. 4 of 2012 concerning Electronic Evidence and the Evidence Law in Civil and Commercial Transactions, as amended by Federal Law No. 36 of 2006, we

maintain strict standards for the admissibility and integrity of electronic records in litigation, ensuring compliance with UAE's evolving digital legal framework. As stipulated by Federal Law No. 11 of 1992 on Civil Procedure, and its amendments, we adhere to legal procedures governing the use of electronic communications in civil and commercial litigation. The firm also complies with Federal Law No. 5 of 2017 regarding the use of Remote Communication Technology in Criminal Proceedings, as well as Ministerial Resolution No. 259 of 2019 that governs electronic and remote litigation procedures in criminal cases. Furthermore, our operations are aligned with the Federal Decree Law No. 20 of 2018 on Anti-Money Laundering (AML) and Combating the Financing of Terrorism and Illegal Organizations, as well as the Cabinet Decision No. 10 of 2019, which establishes the implementing regulations for combating money laundering and terrorist financing. In particular, we ensure that all financial transactions are conducted with full transparency and adherence to the UAE's AML laws, which include stringent reporting and due diligence requirements. As a provider of consultancy services involving trade secrets, we rigorously protect proprietary and confidential business information under Federal Decree-Law No. (5) of 2012, which combats Cybercrimes and ensures the integrity of digital assets. We also adhere to The Abu Dhabi Global Market (ADGM) Data Protection regulations, which offer a robust legal framework for the protection of personal data, ensuring that the privacy of all individuals and corporate entities is respected in accordance with international standards for data security. Additionally, we safeguard the confidentiality of trade secrets through comprehensive risk management protocols, in compliance with UAE's trade secret protection laws, and ensure that all data processing activities meet the latest legal and regulatory requirements in the region. This policy encompasses the protection of both personal and proprietary information, with a firm commitment to preventing unauthorized access, use, or disclosure, in full compliance with UAE's current and future legislative updates governing digital commerce, data privacy, and corporate governance.

## Argentina

In accordance with the Argentine Civil Code, Law No. 25.506 on Digital Signatures, and relevant legal frameworks in 2025, *ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* (the "Company") adheres to the provisions outlined in Article 974 of the Civil Code, which grants flexibility in the form of legal acts unless specific laws prescribe otherwise. As such, the parties involved in transactions or agreements may freely choose the most appropriate forms for these acts. Under Article 978, the law allows for legal expressions to be made either through public instruments or private documents, unless the law mandates a public instrument exclusively for certain transactions. Specifically, Article 1020 provides that there is no special form for acts under private signature, as long as they comply with the solemnities and formalities deemed appropriate by the parties, ensuring freedom of contract while respecting the integrity of the transaction.

Furthermore, the Digital Signature Law No. 25.506 establishes that a digital signature is the outcome of applying a mathematical procedure to a digital document, ensuring that it is uniquely linked to the signer and is under their exclusive control. The law requires that such signatures must be verifiable by third parties to ensure the authenticity of the signer and to detect any alterations to the document post-signing. In compliance with Article 6, digital documents are recognized as valid forms of representation of acts or events, satisfying the requirement for written documents. Article 11 of the Digital Signature Law further clarifies that electronically signed documents, including digitally reproduced documents from original first-generation copies, shall be considered originals and hold probative value equivalent to physical documents, provided they follow the regulations determined by the Enforcement Authority. This ensures that digital documentation and signatures are recognized as legally binding and enforceable, in line with international technological standards and Argentine legal principles. These frameworks not only govern the creation and authentication of electronic records but also fortify their use as admissible evidence in legal and business proceedings, ensuring compliance with evolving technology and privacy

standards, and offering legal certainty for both digital and physical transactions conducted by ZAMBELLI & WISE.

## Canada

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* are fully committed to complying with the Personal Information Protection and Electronic Documents Act (PIPEDA) and the Digital Charter Implementation Act (2020), which govern the collection, use, and disclosure of personal data by private sector organizations in Canada. We adhere to the principles of accountability, transparency, and fairness, ensuring that all personal information is processed in compliance with Canadian privacy laws and regulations. In alignment with these principles, we implement stringent security measures to protect data from unauthorized access, disclosure, or misuse, in line with the latest regulatory updates on data breach notification requirements under PIPEDA and the Privacy Act. Furthermore, ZAMBELLI & WISE comply with Canada's Anti-Spam Legislation (CASL), which regulates the sending of commercial electronic messages and the installation of software, ensuring that our marketing and communication practices are fully opt-in, consensual, and respectful of user preferences. In relation to the Canadian Securities Act and National Instrument 51-102 (Continuous Disclosure Obligations), we ensure the timely and accurate disclosure of financial and material information in compliance with applicable securities regulations to maintain transparency and protect investors. Additionally, ZAMBELLI & WISE strictly observe the Anti-Money Laundering (AML) and Terrorist Financing Act, maintaining comprehensive internal compliance programs designed to detect and prevent money laundering and terrorist financing activities. As part of our cross-border operations, we integrate these Canadian legal requirements with international standards such as the General Data Protection Regulation (GDPR) in the European Union and the U.S. Securities and Exchange Commission (SEC) rules to ensure a holistic approach to regulatory compliance and data protection across our global business activities. Our firm guarantees that all client transactions, investments, and data processing activities are conducted within the framework of legal, ethical, and regulatory norms, including those governing trade secrets, confidentiality, and electronic records retention.

## **Luxembourg**

**ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP** ensure full compliance with Luxembourg's Data Protection Laws in line with the General Data Protection Regulation (GDPR) (EU Regulation 2016/679), and Luxembourg Data Protection Act of 2002, as amended to align with the EU's GDPR provisions. As a global consulting and investment firm, we adhere to Luxembourg's specific requirements under Article 1-16 of the Law of August 1, 2018, which implements the EU Directive on the protection of natural persons with regard to the processing of personal data and the free movement of such data. Our practices are in full conformity with the Luxembourg Commission Nationale pour la Protection des Données (CNPD), which is the data protection authority responsible for monitoring compliance with data protection laws in Luxembourg. Moreover, in accordance with the Law on Electronic Communications, ZAMBELLI & WISE ensure that all electronic communications, including data transfers and marketing communications, are conducted with the highest levels of security, transparency, and integrity. We further comply with Luxembourg's trade secret protection laws, which provide comprehensive protections for proprietary and confidential business information. Under Article 24 of the Trade Secrets Protection Law of 2019, we implement strict security measures and confidentiality agreements to safeguard any proprietary business information, strategies, and intellectual property against unlawful disclosure, acquisition, or use. Additionally, we adhere to Luxembourg's financial regulations and compliance frameworks for international trade, including the Luxembourg Anti-Money Laundering Law (2019), and the EU's 5th Anti-Money Laundering Directive (AMLD5). We rigorously enforce financial transaction screening, customer due diligence (CDD), and enhanced due diligence (EDD) processes to ensure the prevention of money laundering and terrorist financing in accordance with Article 9-14 of the Luxembourg Law of July 12, 2013. ZAMBELLI & WISE also integrate enhanced protection measures for cross-border data transfers and international trade activities under Regulation (EU) 2021/1230, which governs the transfer of personal data outside the EU to third countries, including mechanisms such as Standard Contractual Clauses (SCCs) and Binding Corporate Rules (BCRs).

Furthermore, ZAMBELLI & WISE comply with Luxembourg's Securities Laws and financial regulations set forth by the CSSF (Commission de Surveillance du Secteur Financier), ensuring our investment management activities follow Luxembourg's financial markets laws, including those governing securities offerings, investor protection, and market transparency. Through the integration of these legislative safeguards, ZAMBELLI & WISE guarantees full compliance with Luxembourg's privacy, financial, and intellectual property laws, while protecting trade secrets and personal data at the highest global standards.

### **British Virgin Islands (BVI)**

*ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP* is fully committed to compliance with the legal and regulatory frameworks applicable in the British Virgin Islands (BVI), as well as the broader international standards governing data protection, trade secrets, and financial transactions. In accordance with the BVI Data Protection Act, 2021 (as amended), ZAMBELLI & WISE ensures that all personal data collected and processed in the course of our operations is handled in a lawful, transparent, and secure manner, protecting the rights of individuals and ensuring the proper safeguards for cross-border data transfers. We adhere to global privacy standards, including the General Data Protection Regulation (GDPR) of the European Union, and ensure that any personal data transferred between the EU, BVI, and the United States complies with both GDPR and the BVI Data Protection Act to guarantee lawful processing, consent management, and data subject rights enforcement. Additionally, our firm abides by the BVI International Business Companies Act (IBA) and Financial Services (Exemptions) Regulations, which ensure the lawful structuring and reporting of corporate activities, particularly with respect to financial transactions, trade secrets, and corporate governance. We uphold strict protocols related to anti-money laundering (AML) and counter-terrorism financing (CTF) under the BVI Proceeds of Crime Act (2008) and the Financial Action Task Force (FATF) Recommendations, ensuring that our investment activities, due diligence practices, and reporting obligations remain fully compliant with international and regional anti-financial crime regulations. Furthermore, in line with the British Virgin Islands Business Companies (Beneficial Ownership) Regulations, we

**maintain a transparent and compliant register of beneficial owners, ensuring full regulatory compliance with respect to ownership structures for our clients. The firm further complies with the Financial Services Commission Act (FSC) and related BVI Investment Business Regulations that oversee investment services, ensuring transparent financial management, reporting, and governance aligned with the Securities and Exchange Commission (SEC) in the U.S. and the European Securities and Markets Authority (ESMA) in the EU. We also ensure strict adherence to trade secrets protections under the BVI Trade Secrets Protection Law, safeguarding intellectual property and sensitive commercial information from unauthorized access, disclosure, or misuse. By following these extensive and updated regulatory frameworks, ZAMBELLI & WISE guarantees that all personal, corporate, and financial data is handled with the highest degree of legal and ethical responsibility, safeguarding the privacy and business interests of our clients, while promoting transparency, security, and legal compliance across international jurisdictions.**

**If you have any concerns or wish to exercise your rights in relation to the processing of your personal data, you can contact us directly using the contact details provided in this policy.**

#### **6. Data Sharing**

**We are committed to maintaining the confidentiality and security of your personal data. Your data will not be shared with third parties, except under the following circumstances:**

- 1. Service Providers: We may share your personal data with trusted service providers who assist us in the delivery of our services. These third-party service providers are bound by confidentiality agreements and are required to adhere to appropriate data protection laws and security standards. Examples of such service providers include hosting services, email platforms, payment processors, and customer support tools. We ensure that these providers process your data solely for the purpose of providing services to us and that they are not permitted to use the data for any other purposes.**

2. **Public Authorities:** We may share your personal data with public authorities or governmental agencies, including regulatory bodies, law enforcement, or other authorities, when required by law, legal process, or a court order. This could include compliance with tax laws, anti-money laundering (AML) regulations, financial reporting, or national security requirements.
3. **Mergers, Acquisitions, or Business Restructuring:** In the event of a merger, acquisition, corporate restructuring, or sale of assets, we may transfer your personal data to the acquiring entity, provided that they uphold the privacy standards outlined in this Privacy Policy. If such a transfer takes place, we will notify you in advance of any material changes to the handling of your data.
4. **No Sale of Personal Information:** We will never sell your personal information to third parties for marketing or any other purposes. Your privacy is a top priority, and we are dedicated to ensuring that your personal data remains protected from unauthorized use.

We will take appropriate measures to ensure that your personal data is treated securely and in accordance with applicable laws when shared with third parties. If any additional sharing of your personal data is required, we will seek your prior consent, except in cases where sharing is mandated by law or regulation.

If you have any concerns or questions about how your personal data is shared, please do not hesitate to contact us.

#### **7. International Data Transfers**

ZAMBELLI INTERNATIONAL CONSULTING LLC and WISE UNIVERSAL GROUP (hereinafter referred to as "ZAMBELLI & WISE") operate globally, with a presence in multiple jurisdictions. As part of our operations, it may be necessary to transfer your personal data to countries outside of your country of residence, including countries located outside the European Economic Area (EEA), the United Kingdom, and the United States, depending on where our service providers, affiliates, or business partners are located.

In order to ensure that your personal data is adequately protected during such transfers, we implement appropriate safeguards in compliance with applicable data protection laws, including but not limited to:

- 1. Standard Contractual Clauses (SCCs):** We may use Standard Contractual Clauses approved by the European Commission, the UK Information Commissioner's Office (ICO), or other competent regulatory bodies as a legal mechanism to ensure that your personal data remains protected when transferred to countries outside the EEA or UK.
- 2. Adequacy Decisions:** In certain cases, personal data may be transferred to countries that have been recognized by the European Commission or UK government as providing an adequate level of data protection, such as those within the EEA or countries with adequacy decisions under the General Data Protection Regulation (GDPR) and UK GDPR.
- 3. Binding Corporate Rules (BCRs):** For transfers within our corporate group, we may also implement Binding Corporate Rules (BCRs), which are legally binding commitments governing how personal data is processed across our internal network, ensuring compliance with data protection standards.
- 4. Other Mechanisms:** In cases where the above mechanisms are not available or applicable, we may rely on other legal frameworks, such as consent from the data subject or other derogations under the GDPR or applicable data protection laws, to ensure that data transfers are conducted in a lawful and secure manner.

By using our services, you acknowledge and consent to the possibility of international data transfers, and we assure you that we take all reasonable and necessary measures to ensure the security and protection of your personal data when such transfers occur.

If you have concerns about how your data is transferred or wish to obtain further information about the safeguards in place, please contact us directly.

## **8. Your Rights**

In accordance with applicable data protection laws, you have the following rights regarding your personal data:

- 1. Right of Access:** You have the right to request access to the personal data we hold about you. This allows you to be informed about the nature of the data we process, the purposes for which it is being processed, and to obtain a copy of your personal data.

2. **Right to Rectification:** You have the right to request the correction of any inaccurate or incomplete personal data we hold about you. We encourage you to keep your personal data up to date to ensure its accuracy.
3. **Right to Erasure (Right to be Forgotten):** You have the right to request the deletion of your personal data, subject to certain conditions. This includes situations where the data is no longer necessary for the purposes for which it was collected, or where you withdraw your consent and no other legal basis for processing exists.
4. **Right to Restriction of Processing:** You have the right to request the restriction of processing of your personal data in certain circumstances, such as when the accuracy of the data is contested or when you have objected to the processing of your data and are awaiting verification.
5. **Right to Object to Processing:** You have the right to object to the processing of your personal data, including for marketing purposes or for processing based on legitimate interests. In such cases, we will cease processing your data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights, and freedoms.
6. **Right to Data Portability:** You have the right to request that your personal data be transferred to another data controller, in a structured, commonly used, and machine-readable format, where technically feasible, provided that the processing is based on consent or the performance of a contract.
7. **Right to Withdraw Consent:** If we are processing your personal data based on your consent, you have the right to withdraw that consent at any time. Withdrawing consent will not affect the lawfulness of processing based on consent before its withdrawal.

To exercise any of the above rights, please contact us by sending an email to [info@jzambelliconsulting.com](mailto:info@jzambelliconsulting.com). We will respond to your request within the timeframes required by applicable data protection laws.

Please note that some of these rights may be subject to exceptions or limitations under applicable laws, and we may need to verify your identity before processing your request to ensure your data is protected.

## 9. Data Retention

We will retain your personal data for no longer than necessary to fulfill the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements. The retention period may vary depending on the type of data and the applicable legal or regulatory obligations.

Specifically:

1. **Duration of Business Relationship:** Your personal data will be retained for the duration of our business relationship or as long as necessary to provide you with the services you have requested.
2. **Compliance with Legal Obligations:** After the business relationship ends, we may need to retain certain data for longer periods to comply with legal obligations, such as tax, financial, or regulatory requirements. This may include retaining records for audit purposes or to comply with laws related to anti-money laundering, fraud prevention, or contract law.
3. **Legitimate Interests:** We may also retain data for a period that allows us to protect our legitimate interests, such as for the establishment, exercise, or defense of legal claims or other administrative purposes related to our business.
4. **Archival Purposes:** In certain cases, we may retain your data for historical or archival purposes where permitted by law.

#### Data Retention for Judicial Processes

ZAMBELLI International Consulting LLC adheres to strict data retention practices that are in full compliance with applicable legal, regulatory, and industry standards. Specifically, we retain data for judicial processes such as e-discovery, commercial discovery, and framework asset recovery, in accordance with various national and international regulations, including:

- **FINCEN (Financial Crimes Enforcement Network):** As required by FINCEN and other relevant U.S. regulatory bodies, we may retain personal and transactional data for the purpose of complying with anti-money laundering (AML) regulations, fraud detection, and other financial crimes prevention measures. This data may be retained for the duration required to support

investigations, audits, and legal proceedings, and may be disclosed to law enforcement or regulatory authorities when required.

- **GAFILAT (Grupo de Acción Financiera de Latinoamérica):** In compliance with GAFILAT regulations, which align with the global Financial Action Task Force (FATF) standards, we retain certain financial and personal data for the purpose of combating money laundering and terrorist financing. This includes records related to financial transactions, client due diligence, and suspicious activity reporting. We will retain such data for as long as necessary to meet legal obligations or support regulatory investigations.
- **Middle East Comptroller General Regulations:** In certain jurisdictions within the Middle East, local regulatory authorities may require the retention of specific types of financial or personal data as part of anti-money laundering (AML) and know-your-customer (KYC) requirements. In compliance with such regulations, we may store relevant data to assist with asset recovery, fraud prevention, and legal proceedings related to financial crimes or commercial disputes.
- **FTAC (Financial Transaction and Anti-Corruption Act) and FATF (Financial Action Task Force):** In compliance with the FATF standards and related legislation such as FTAC, we may retain relevant financial and personal data for the purpose of supporting anti-corruption investigations, commercial dispute resolution, asset recovery, and compliance with global anti-money laundering (AML) and counter-terrorism financing (CTF) measures. This data is retained as long as necessary for these purposes and in accordance with applicable legal requirements.

Data retention related to judicial processes will be managed with strict confidentiality and security measures in place to protect against unauthorized access, loss, or misuse. We will retain the data for as long as legally necessary or until the judicial process or framework asset recovery is complete, whichever is later. Data will be securely disposed of or anonymized once it is no longer required for these purposes.

Please note that any disclosure of personal or sensitive data will only be made in compliance with relevant legal obligations or regulatory requirements, and data

will not be shared with third parties unless specifically required by law or regulatory authorities.

For further inquiries regarding our data retention practices and your rights, please feel free to contact us at the details provided.

Once the retention period expires, your data will be securely deleted or anonymized, unless a legal obligation or legitimate interest requires its continued retention.

#### **10. Information Security**

At ZAMBELLI & WISE, we prioritize the protection of your personal data and have implemented robust technical and organizational measures to safeguard it against unauthorized access, alteration, disclosure, or destruction. These measures are designed to ensure the confidentiality, integrity, and availability of your data and to comply with the highest security standards in accordance with applicable data protection laws.

Our security measures include, but are not limited to:

- 1. Encryption:** We use advanced encryption technologies to protect the transmission of sensitive data, ensuring that it remains confidential and secure during transit between our systems and users.
- 2. Secure Protocols (SSL/TLS):** We implement secure communication protocols such as SSL (Secure Sockets Layer) and TLS (Transport Layer Security) to ensure the integrity and privacy of data exchanged between our website and its visitors.
- 3. Access Restrictions:** Access to your personal data is strictly controlled and limited to authorized personnel only. We enforce role-based access controls, ensuring that only those who need the data to perform their duties are granted access. Additionally, we regularly review access rights to maintain tight security.
- 4. Regular Internal Audits:** We conduct periodic internal audits and security assessments to evaluate the effectiveness of our data protection measures. These audits help us identify any potential vulnerabilities and take corrective actions promptly.

5. **Data Backup and Recovery:** We maintain regular data backups and disaster recovery protocols to ensure that in the event of a data breach or system failure, we can restore your data securely and promptly.
6. **Employee Training and Awareness:** :Our staff undergoes regular training on data protection and security practices to ensure they are aware of potential threats and understand how to safeguard personal data appropriately.

While we take every precaution to protect your data, please be aware that no method of transmission over the internet or method of electronic storage is 100% secure. We cannot guarantee absolute security, but we continually strive to maintain a high level of security for your personal information.

#### **11. Cookies and Similar Technologies**

This website uses cookies and similar tracking technologies to enhance your user experience, analyze site traffic, and provide personalized content. Cookies are small text files stored on your device when you visit our site. These technologies enable us to recognize your preferences, improve the functionality of our website, and ensure that you have an optimal browsing experience.

The use of cookies serves several purposes, including:

1. **Functionality Cookies:** These cookies are essential for the proper functioning of the website. They enable basic features, such as page navigation and secure areas of the website. Without these cookies, the website may not function properly.
2. **Analytical Cookies:** We use analytical cookies, such as Google Analytics, to collect information about how visitors use our website. This information helps us understand user behavior, identify areas for improvement, and optimize the website's performance.
3. **Preference Cookies:** These cookies allow us to remember your preferences, such as language settings and personalization options, to provide a more tailored experience during your visit.
4. **Marketing and Retargeting Cookies:** We may use marketing cookies to show relevant advertisements or promotional content to users who have previously visited our website. These cookies track user activity across

different websites and enable us to provide targeted advertising based on your interests.

5. **Third-Party Cookies:**Our website may include third-party content, such as social media widgets, embedded videos, or advertisements. These third-party services may use cookies to track your activity on our site, and we encourage you to review the privacy policies of these third parties to understand how they collect and use your data.

#### **Managing Cookies:**

You have the option to control the use of cookies on your device through your browser settings. You can disable cookies, delete stored cookies, or configure your browser to alert you when a cookie is being set. However, please note that disabling certain cookies may impact the functionality and performance of the website.

For more detailed information on how we use cookies, and to manage your preferences, please refer to our Cookie Policy.

#### **12. Policy Changes**

ZAMBELLI & WISE reserve the right to modify, update, or amend this Privacy Policy at any time to reflect changes in applicable laws, regulations, or business practices. These changes may be necessary due to legislative or case law developments, adjustments to our operational procedures, or new data protection requirements. We recommend that you periodically review this policy to stay informed about how we are protecting your personal information.

Any amendments, modifications, or updates to this Privacy Policy will take effect immediately upon publication on our website. We will make reasonable efforts to notify users of significant changes, either through direct communication or a prominent notice on our website. By continuing to use our services after such changes are published, you acknowledge and consent to the updated terms of the Privacy Policy.

For any questions or concerns regarding these changes or the processing of your data, please feel free to contact us at [info@jzambelliconsulting.com](mailto:info@jzambelliconsulting.com).

#### **13. Contact Us**

If you have any questions, concerns, or requests regarding this Privacy Policy, or if you wish to exercise any of your rights outlined herein, please do not hesitate to contact us at:

Privacy Email Address: [info@jzambelliconsulting.com](mailto:info@jzambelliconsulting.com)

We are committed to ensuring your privacy and data protection, and our team will be happy to assist you in addressing any queries or concerns you may have.

On behalf of the team at ZAMBELLI INTERNATIONAL CONSULTING LLC, we would like to sincerely thank you for taking the time to read and understand this Privacy Policy.

We appreciate your trust and look forward to serving you with the utmost professionalism and care.

Sincerely,

Mr. José Zambelli

Counsel & BA (PLS)

CEO, Director & CLO

ZAMBELLI INTERNATIONAL CONSULTING LLC & WISE UNIVERSAL GROUP  
HOLDING COMPANY



**[www.jzambelliconsulting.com](http://www.jzambelliconsulting.com)**