LION FINANCE GROUP PLC PRIVACY POLICY

Lion Finance Group PLC (“we", “LFG” or the “Company”), registered in England and Wales under company number 10917019 and having our registered office at 29 Farm Street, London, United Kingdom, W1J 5RL and the other companies belonging to the Group (hereinafter “Group Companies”) take utmost care of personal information and treat it according to personal data protection legislation.

Lion Finance Group PLC acts as data controller in respect of personal data collected via this website and in connection with the Company's activities as a UK-listed holding company (including investor relations and shareholder data).

Please note that each of JSC Bank of Georgia and Ameriabank CJSC have their own privacy policies, available here:

- https://bankofgeorgia.ge/en/privacy-notice (in the case of JSC Bank of Georgia); and
- https://ameriabank.am/investors/privacy-policy (in the case of Ameriabank CJSC).

Where two or more Group Companies jointly determine the purposes and means of processing your personal data, they act as joint controllers within the meaning of Article 26 of the UK General Data Protection Regulation ("UK GDPR"). Further details of the joint controller arrangement are available on request.

Our Data Protection Officer (“DPO”) can be contacted at by post at Data Protection Officer, Lion Finance Group Plc, 29 Farm Street, London, United Kingdom, W1J 5RL and by email at dpo@lfg.uk.

How we use your personal information

This Privacy Policy explains how the Group processes and uses your personal information. It sets out the principles we follow when handling your personal data and how the law protects you. It covers personal data obtained by the Group, including in the following contexts:

- as a customer or prospective customer of any Group Company;
- as a supplier or business counterparty of any Group Company;
- as a shareholder or investor in the Company;
- as a job applicant to any Group Company;
- as a visitor to our websites and mobile applications; and
- for direct marketing purposes.

This Privacy Policy applies in line with the UK GDPR and the Data Protection Act 2018 ("DPA 2018").

Our privacy promise

We promise:

- To keep your data safe and private;
- Not to use your data unlawfully; and

- To provide you, on request, with clear and complete information about how your personal information is processed.

How the law protects you

In addition to our Privacy Promise, your privacy is protected by the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Law of Georgia on Personal Data Protection, and the Law of the Republic of Armenia on Personal Data (each as applicable depending on the Group Company processing your data and the nature of the processing activity).

Under applicable data protection law, you have a number of rights in relation to your personal data, which are set out in detail in the "Your Rights" section of this Privacy Policy below.

We are only permitted to use your personal data where we have a lawful basis for doing so.

It is fundamental to our approach that the processing of your personal data does not harm your interests. The processing of personal data of a minor is permitted only in accordance with applicable data protection legislation and, in all cases, taking into account the best interests of the minor.

Sources from which we obtain personal information

We can collect personal information about you from the sources provided by you and listed below:

You provide us with the data in the context of a range of interactions, which may include the following:

- When you become a customer/supplier of any Group Company;
- When you register for our online services;
- When you apply for our products and services;
- During a telephone conversation or your visit to us;
- When you use our websites, mobile device apps and web chat;
- When you send letters by mail or e-mail;
- When you carry out banking transactions with our help;
- When you use the services provided by our Group Companies; and
- When you apply for a position with any Group Company.

We collect data from third parties and external sources, including:

- Public registers (including companies registries, land registries, and insolvency registers);
- Payment and transaction processors;
- Credit reference agencies;
- Other financial institutions, where permitted by applicable law;
- Public authorities and law enforcement agencies;
- Fraud prevention agencies and sanctions screening databases; and

- Our Group Companies, where data is shared within the Group for the purposes described in this Privacy Policy.

Cookies

We use cookies and similar tracking technologies on our website to improve user experience and to analyse how our site is used.

Cookies are small files placed on your device (PC, tablet, or mobile phone) by websites when you visit them. They are sent back to the website on subsequent visits.

We use the following categories of cookies:

- Strictly necessary cookies: these are essential for the operation of our website and do not require your consent;
- Analytics and performance cookies: these help us understand how visitors interact with our website. We will only place these cookies with your prior consent; and
- Functional and personalisation cookies: these remember your preferences and settings. We will only place these cookies with your prior consent.

You may withdraw your consent to non-essential cookies at any time by adjusting your cookie preferences via the cookie settings tool on our website. Withdrawing consent will not affect the lawfulness of any processing carried out before withdrawal.

To find out more about how we use cookies, including a full list of the cookies we use and their purposes, please see our Cookie Settings, which can be found on our site, and which set out information about the cookies on our site.

Your rights

Under applicable data protection law (including the UK GDPR, the DPA 2018, Georgian data protection legislation, and Armenian data protection legislation, as applicable), you have certain rights in relation to your personal data.

You can receive the following information:

- What data is being processed with regard to you;
- What is the purpose of data processing;
- Legal basis for the data processing;
- How the data were processed;
- Who the data was transferred to;
- Data issuance ground and purpose.

You can request a copy of the information processed by us.

Under the law, you are authorised to require adjustment, update, addition, blockage, deletion or destruction of your personal data if it appears to be incomplete, incorrect, out-of-date or if the process of information gathering and processing is carried out illegally. We observe the requirements defined by

UK GDPR and other applicable legislation which may prevent us from an immediate deletion of your personal data. Such obligations may stem from the laws on anti-money laundering, tax, activities of commercial banks consumer rights protection and other.

Communication security

Whilst we take steps to protect the security of communications between you and us (including the use of encryption technologies where appropriate), please be aware that the transmission of information over the internet is not completely secure and we cannot guarantee the security of data transmitted to us electronically.

If you communicate with us by email in the ordinary course of business, we will use reasonable endeavours to protect such communications, but we cannot accept liability for the security of information transmitted to us by email where the risk of interception or loss arises outside our systems.

Who we share your personal information with

We may share your personal data with the following non-exclusive list of categories of recipients, in each case only to the extent necessary and in accordance with applicable data protection law:

Third-party service providers who assist us with activities such as:

- Designing, developing and maintaining internet-based tools and applications;
- IT infrastructure and application services, including cloud hosting providers;
- Legal, auditing or other professional services (i.e. lawyers, notaries, trustees, company auditors or other professional advisors);
- Identifying, investigating or preventing fraud or other misconduct; and
- Carrying out banking/financial arrangements (e.g. trustees, investors, and advisers).

Other Group Companies, where sharing is necessary for the purposes described in this Privacy Policy.

Regulatory and public authorities, including the Financial Conduct Authority (FCA), the National Bank of Georgia, the Central Bank of Armenia, HM Revenue & Customs, the Financial Intelligence Unit, and other governmental or regulatory bodies, where we are required by law to do so or where disclosure is necessary for the prevention or detection of crime.

Credit reference agencies and fraud prevention agencies, for the purposes of credit assessment, AML screening, and fraud detection.

We may also share your personal information if the corporate structure of the Group changes in the future:

- We may choose to sell, transfer, or merge parts of our business, or our assets.
- If any such transaction occurs, we will share your data with the relevant counterparties only to the extent necessary. Any acquirer will be required to treat your personal data in accordance with applicable data protection law.
- Any change in our group structure will not affect the protections afforded to your data under this Privacy Policy and applicable data protection law.

Whenever we share your personal data with third parties, we ensure the appropriate contractual and organisational safeguards are in place to protect it, including by entering into data processing agreements or data sharing agreements with third-party recipients as required by applicable law.

International Transfers

In case your Personal Data is transferred outside the EU and the EEA, the Group will take all reasonable steps to ensure that the data is treated securely and in accordance with this Privacy Policy and we will ensure that it is protected and transferred in a manner consistent with the legal requirements applicable to the Personal Data.

How we use your information to make automated decisions

For making automated decisions, including profiling, we may use the personal data we have, or are allowed to collect from other entities based on the legislation, contracts signed with you, or consent given by you. This helps us ensure that our decisions are quick, fair, and efficient. These automated decisions can affect the quality of products and services offered by us now or to be offered in the future.

You can ask us to stop sending you marketing messages by contacting us at any time at ir@lfg.uk. We respect your wishes and will stop using your data for marketing purposes.

Personal data processing for direct marketing purposes

We may use your personal information to tell you about relevant products and offers.

We gather your personal information from what you share with us and what we collect from the sources available to us when you use our services.

We study your data to form a view on what you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

We will only use your personal information to send you marketing messages if we have either your explicit consent or a legitimate interest in doing so. Where we rely on legitimate interests, we will always balance our interests against yours and will not use your data for marketing where our interests are overridden by any prejudice to your interests, rights, or freedoms.

You have an absolute right to object to your personal data being used for direct marketing purposes at any time, without providing any reason. To exercise this right, you may:

- click the "unsubscribe" link in any marketing email we send you;
- reply "STOP" to any marketing text message (SMS) we send you; or
- contact us at ir@lfg.uk.

We will action your request within one month of receipt. Once you have opted out, you will continue to receive essential service communications (such as statements and notifications of changes to your account terms), but we will not send you marketing messages.

Your security is important to us. Therefore, you will continue to receive statements regarding the changes in the facilities proposed to you and in terms of service.

How long we keep personal data

We retain your personal data for as long as is necessary for the purposes for which it was collected, and in accordance with our legal and regulatory obligations. Different retention periods apply to different categories of data. Where we are required by law or regulation to retain data, we will retain the data for the period required by law. We will not retain your personal data for longer than is necessary for the purposes for which it is held.

How to withdraw your consent

You can withdraw your consent at any time, in case there are no other legislative requirements. To do so, please contact us at dpo@lfg.uk or, in the case of consent to direct marketing, use one of the opt-out methods described above.

This will only affect the way we use information when our reason for doing so is that we have your consent. Withdrawing your consent will not affect the lawfulness of any processing we carried out before you withdrew it.

If you withdraw your consent, we may not be able to provide certain products or services to you. We will inform you of any such consequence at the time you withdraw your consent, or as soon as reasonably practicable thereafter.

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time to remain compliant with changes in applicable law and/or to reflect changes in how the Group processes personal data. Where we make any material change to this Privacy Policy — for example, a change that affects the purposes for which we use your data or the categories of recipients with whom we share it — we will update the "last updated" date at the top of this page.

We recommend that you review this Privacy Policy periodically.

How to contact us

If you have any questions about this Privacy Policy, wish to exercise any of your data subject rights, or have a concern about how we handle your personal data, please contact us by post at Data Protection Officer, Lion Finance Group Plc, 29 Farm Street, London, United Kingdom, W1J 5RL and by email at dpo@lfg.uk.

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