

Privacy Policy

English Version

Last Updated: July 4, 2025

J.P Capital ("we," "us," or "our") is committed to protecting your privacy. This Privacy Policy outlines how we collect, use, disclose, and safeguard your personal information when you visit our website (<https://jp-capital.co>), interact with our services, or engage with us through other channels. By accessing our website or using our services, you consent to the practices described in this policy. We adhere to applicable data protection laws, including those in Argentina and international regulations relevant to our operations.

1. Information We Collect

We collect information to provide, improve, and personalize our services. The types of information we may collect include:

- **Personal Information:** This includes your full name, email address, phone number, mailing address, and other identifiable information you voluntarily provide when you contact us, register for an account, request services, or participate in our events. For clients, we may also collect financial information, such as account details or investment preferences, to fulfill Know Your Customer (KYC) and Anti-Money Laundering (AML) requirements.
- **Usage Data:** We automatically collect information about your interactions with our website, including your IP address, browser type and version, operating system, device identifiers, pages visited, time and date of visits, and time spent on each page. This data helps us understand user behavior and optimize website performance.
- **Cookies and Tracking Technologies:** We use cookies, web beacons, and similar technologies to enhance your browsing experience, analyze website traffic, and deliver personalized content. Cookies may store preferences or track navigation patterns. You can manage or disable cookies through your browser settings, though this may affect certain website functionalities.
- **Third-Party Data:** With your consent, we may receive information from third parties, such as business partners (e.g., J.P. Morgan

or Grupo ST) or analytics providers, to supplement our understanding of your preferences or needs.

We only collect information that is necessary for our services or required by law, and we aim to minimize data collection where possible.

2. How We Use Your Information

We use your information to deliver high-quality wealth management services and maintain an efficient, secure website. Specific purposes include:

- **Service Delivery:** To respond to your inquiries, process service requests, manage client accounts, and provide tailored investment advice. For example, we use your contact details to schedule consultations or provide updates on your investment portfolio.
- **Personalization:** To customize your website experience, such as displaying relevant content or recommending resources based on your interests or browsing history.
- **Analytics and Improvement:** To analyze website usage patterns, identify technical issues, and enhance user experience. For instance, we may track which pages are most visited to improve navigation or content.
- **Compliance:** To meet legal and regulatory obligations, including KYC and AML requirements, tax reporting, and other financial regulations in Argentina, the United States, and other jurisdictions where we operate.
- **Marketing and Communication:** To send you updates, newsletters, or promotional materials about our services, events, or market insights, provided you have opted in. You can unsubscribe from marketing communications at any time via the link in our emails or by contacting us.
- **Security:** To detect and prevent fraudulent activities, unauthorized access, or other security threats to our website and services.

We ensure that all data usage complies with applicable laws and is conducted with transparency and accountability.

3. Sharing Your Information

We may share your information under specific circumstances to support our services or comply with legal requirements. Recipients and purposes include:

- **Service Providers:** We engage trusted third-party vendors to assist with website hosting, data analytics, customer relationship management, or payment processing. These providers are bound by strict confidentiality agreements and are only permitted to use your information for the purposes we specify.
- **Regulatory Authorities:** We may disclose your information to government agencies, financial regulators, or law enforcement as required by law, such as for KYC/AML compliance, tax reporting, or in response to legal processes (e.g., subpoenas).
- **Business Partners:** With your explicit consent, we may share information with our partners, such as J.P. Morgan or Grupo ST, to facilitate joint services, such as cross-border asset allocation or client onboarding.
- **Business Transfers:** In the event of a merger, acquisition, or sale of assets, your information may be transferred to the acquiring entity, with appropriate safeguards to ensure continued protection.
- **Aggregated Data:** We may share anonymized, aggregated data (e.g., website traffic statistics) with partners or for research purposes, but this data cannot be used to identify you.

We do not sell, rent, or otherwise disclose your personal information to third parties for marketing purposes without your consent.

4. Data Security

We prioritize the security of your personal information and employ robust measures to protect it, including:

- **Technical Safeguards:** Encryption (e.g., SSL/TLS for website data transmission), firewalls, and secure servers to prevent unauthorized access or data breaches.
- **Administrative Controls:** Access to your information is restricted to authorized personnel who require it for their job functions. All staff undergo regular training on data protection practices.
- **Monitoring and Testing:** Regular security audits, vulnerability assessments, and penetration testing to identify and address potential risks.

- **Incident Response:** A comprehensive plan to promptly address and mitigate any data security incidents, including notifying affected users where required by law.

Despite these measures, no online system is entirely immune to risks. We cannot guarantee absolute security but are committed to maintaining high standards to protect your data.

5. Your Rights

As a user, you have several rights regarding your personal information, subject to applicable laws:

- **Access:** You can request a copy of the personal information we hold about you, including details on how it is used.
- **Correction:** You can request corrections to inaccurate or incomplete information.
- **Deletion:** You can request the deletion of your personal information, unless we are required to retain it for legal or regulatory purposes.
- **Restriction:** You can request that we limit the processing of your information under certain conditions.
- **Objection:** You can object to certain uses of your information, such as for direct marketing.
- **Data Portability:** Where applicable, you can request your information in a structured, machine-readable format for transfer to another provider.
- **Opt-Out:** You can opt out of marketing communications at any time by clicking the unsubscribe link in our emails or contacting us.

To exercise these rights, please contact us at support@jp-capitalvip.com. We will respond to your request within the timeframes required by law (typically 30 days) and may require identity verification to protect your privacy.

6. International Data Transfers

As a global wealth management firm, we may transfer your personal information to countries outside Argentina, including the United States (where J.P. Morgan operates) or other jurisdictions where our service providers are located. To ensure your data remains protected:

- **Safeguards:** We use contractual agreements, such as Standard Contractual Clauses (SCCs), to ensure third parties meet data protection standards equivalent to those in Argentina.
- **Compliance:** We comply with international data transfer regulations, including those under Argentine data protection laws and, where applicable, the General Data Protection Regulation (GDPR) for clients in relevant jurisdictions.
- **Risk Assessment:** We conduct regular reviews of our data transfer practices to mitigate risks associated with cross-border data flows.

If you have concerns about international data transfers, please contact us for more details.

7. Changes to This Policy

We may revise this Privacy Policy to reflect changes in our practices, legal requirements, or industry standards. Updates will be posted on the website with the revised "Last Updated" date. We will notify you of significant changes via email or a prominent notice on the website, where required by law. Your continued use of the website or services after the updated policy takes effect constitutes your acceptance of the changes. We encourage you to review this policy periodically to stay informed.

8. Contact Us

If you have questions, concerns, or complaints about this Privacy Policy or our data practices, please reach out to us:

- **Email:** support@jp-capitalvip.com

We will respond promptly to your inquiries and work to resolve any issues in accordance with applicable laws. If you are not satisfied with our response, you may contact the relevant data protection authority in your jurisdiction, such as the Argentine Agency for Access to Public Information (AAIP).