Legal Disclaimer (Global Uniform Application)

1. General Information

The Aurora Bosphorus Capital website (acaaurora.com) and all related platforms provide information for general reference purposes only and do not constitute any form of investment advice, offer, solicitation, or legal opinion. All content is provided “as is” without any express or implied warranties.

2. Not an Offer or Solicitation

Nothing on this website constitutes an offer or solicitation to sell securities, investment products, or provide investment services to any person in any jurisdiction. Aurora Bosphorus Capital does not provide personalized investment advice through this website. Any investment decision should be based on your independent judgment and consultation with qualified professional advisors.

3. Forward-Looking Statements

Certain statements on this website may constitute “forward-looking statements” as defined under the U.S. Private Securities Litigation Reform Act of 1995 or other applicable laws. Such statements involve multiple risks, uncertainties, and assumptions that may cause actual results to differ materially from expectations. Aurora Bosphorus Capital has no obligation to update or revise any forward-looking statements.

4. No Warranties and Disclaimer

Aurora Bosphorus Capital makes no express or implied warranties regarding the accuracy, completeness, timeliness, or suitability of the website content.

To the maximum extent permitted by law, we shall not be liable for any loss (direct, indirect, incidental, consequential, or punitive) arising from the use of or reliance on the information on this website.

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To the maximum extent permitted by applicable law, Aurora Bosphorus Capital, its affiliates, officers, directors, employees, and agents shall not be liable for any loss arising from access to or use of this website (including third-party links), including but not limited to loss of profits, goodwill, or data.

6. Third-Party Links

This website may contain links to third-party websites. We are not responsible for their content, privacy policies, or practices, and access is at your own risk.

7. Intellectual Property

All content on the website (including but not limited to text, graphics, logos, software, and databases) is owned by Aurora Bosphorus Capital or its licensors and is protected by U.S., EU, and international copyright, trademark, and intellectual property laws. Copying, modification, distribution, or commercial use without written authorization is prohibited.

8. Governing Law and Dispute Resolution

This legal disclaimer is governed by and construed in accordance with the laws of the State of Colorado, USA, without regard to conflict of law principles. Any dispute shall first be resolved through good-faith negotiation; if unsuccessful, it shall be submitted to the exclusive jurisdiction of the competent courts in

Colorado. However, EU users may bring proceedings in their member state court under Article 79 of the GDPR.

9. Changes to Disclaimer

We reserve the right to modify this legal disclaimer at any time. Material changes will be announced on the website or notified by email 30 days in advance. Continued use constitutes acceptance of the latest version.

Privacy Policy (Global Regional Compliance Version)

1. Scope and Regional Principles

This policy applies uniformly worldwide, but automatically triggers different levels of privacy protection based on your place of residence or location of access, ensuring you always receive the highest level of protection.

2. U.S. Users

Subject to U.S. federal law, Colorado state law, and the Gramm–Leach–Bliley Act (GLBA).

Contact for exercising rights: privacy.us@acaaurora.com

3. EU, EEA, and UK Users

Fully compliant with the General Data Protection Regulation (GDPR) and UK GDPR.

Data Controller: Aurora Bosphorus Capital Ltd, 5475 Tech Center Dr #300, Colorado Springs, CO 80919, USA

Data Protection Officer (DPO): dpo@acaaurora.com

You have full data subject rights: access, rectification, erasure, restriction of processing, data portability, objection to processing (including automated decision-making), and withdrawal of consent at any time.
Legal basis for processing: contract performance, legal obligations, legitimate interests (subject to LIA assessment).
International transfer safeguards: EU-U.S. Data Privacy Framework (EU-U.S. DPF) approved by the European Commission, Standard Contractual Clauses (SCC), and supplementary measures.

4. Users in Other Jurisdictions

Subject to mandatory privacy laws in your country or region. If local law provides higher protection, that standard shall prevail.

5. Information We Collect (Global Uniform)

Identity information: name, date of birth, nationality, ID/passport
Contact information: email, phone, mailing address
Financial information: bank account, transaction records, tax residency
KYC/AML information: identity documents, source of funds proof
Technical information: IP address, device identifiers, browser fingerprint, access logs
Cookies and tracking technology data

6. Purposes of Use (Global Uniform)

To provide asset management and investment education services
To conduct KYC, AML/CFT, and sanctions screening
To fulfill tax reporting obligations (FATCA, CRS)
For risk management and fraud prevention

To improve products and services (after anonymization)

For marketing communications with your explicit consent

7. Data Sharing (Strictly Controlled)

Shared only in the following cases:

Compliant custodian banks, payment processors, audit institutions

Regulatory authorities and law enforcement (as required by law)

Business successors (in case of merger or acquisition)

We do not sell, rent, or share data with third parties for direct marketing purposes.

8. Data Security

We employ bank-grade AES-256 encryption, TLS 1.3 transmission, zero-trust architecture, multi-factor authentication, regular penetration testing, and an ISO 27001-certified security management system.

9. Data Retention

Data is retained only for the minimum period necessary to fulfill the collection purpose or legal requirements. KYC documents are retained for up to 5 years after the end of regulatory requirements; marketing consent can be withdrawn at any time.

10. Your Global Unified Contact Methods

Privacy matters: privacy@acaaurora.com

EU Data Protection Officer: dpo@acaaurora.com

U.S. compliance line: privacy.us@acaaurora.com

Mailing address: 5475 Tech Center Dr #300, Colorado Springs, Colorado 80919, United States of America

We promise: No matter where you are in the world, your privacy will receive the highest standards and the most rigorous protection.

Aurora Bosphorus Capital Legal and Compliance Team