

AKJ Data Protection Notice

1. Introduction

The General Data Protection Regulation (GDPR) came into effect 25 May 2018 and outlines the requirements behind the processing of Personal Data and the free movement of such data. Personal Data will be subject to processing and controlling in accordance with Article 6 of GDPR by AKJ and our third-party service providers and their delegates, authorized agents and associated or affiliated companies within the European Union.

2. Personal Data and the legal basis for processing such data

AKJ may collect from you and process Personal Data of the kind that can be found on the below list (not exhaustive):

Name/Email/Address/Passport/CVs/Personal numbers (or equivalent local ID)/Personal trading statements/Bank details/Lexus nexus searches/Phone recordings/IP address/Investor Categorisation/Cookies

Processing of your Personal Data will take place:

- on the basis of being in compliance with a legal obligation and/or
- on the basis of a contractual necessity and/or
- on the basis of a legitimate interest and/or
- on the basis of consent being given.

a. To comply with our legal and regulatory obligations

We may use your personal data to comply with various legal and regulatory obligations, including:

- To be in compliance with financial regulations such as FCA rules.
- To record, when necessary, telephone calls, emails etc.
- To respond to regulators and/or other similar authorities for information requests.
- For the prevention of money-laundering and financing of terrorism.
- To be in compliance with legislation relating to sanctions.
- To fulfil tax related obligations such as FATCA and CRS.

b. To perform a contract with you or to take steps at your request before entering into a contract

We may use your personal data to enter into and perform our contracts, including to:

- Provide you with information regarding our offering and services.
- Assist you and answer your requests.

c. For legitimate interest purposes

We may use your personal data in order to:

- Provide you with information that you would deem helpful and/or of interest. AKJ must undertake the “legitimate interests” test in such scenarios.

d. Giving us consent for specific processing

There may be times when we would require your consent in order to process your data such as:

- Where processing leads to automated decision-making and where such processing may significantly affect you. Should this take place, we would take the necessary steps to inform you of such significance and any consequences of processing such data.

If we need to carry out further processing for purposes other than those mentioned, we will inform you and, where necessary, obtain your consent.

4. Personal Data through AKJ’s website and other electronic means

When visiting our website www.akj.com and www.akjtoken.com AKJ may collect personal information on you that you voluntarily provide to us as a result of either:

a. Sending a query via the website contact form or via email

When sending a query via the website contact form or via email, you are voluntarily providing personal information of the following kind:

- Name (the only mandatory field in the Contact Form)/Company Name/Email/Telephone number/Country where resident

The AKJ website features a contact form for requests of information. Upon submission, the above data is transmitted via email to AKJ. Only the name field in the Contact Form is mandatory together with either an email and/or telephone number, in order to avoid spam & bots.

The Contact Form also contains a check button (“Keep me updated”), which has as a purpose of explicitly asking for your consent in the event that you wish for further information about AKJ.

Any other information you may choose to share with us via the contact form – as filled in the Message field – is entirely up to you.

Unless you have checked the “Keep me updated” button and/ or provided such explicit requests to AKJ, we may not and will not use the personal data you provided other than to answer your query.

b. Filling out the investor categorization link

When filling out the investor categorization link, you are voluntarily providing personal information of the following kind:

- Name/Company Name/Email/Telephone number/Country resident/IP Address (to ensure that multiple requests are not performed by the same one person)/Investor Categorisation

Such information will be processed by AKJ to ensure that you meet the necessary regulatory MiFID II categorization of a professional investor or equivalent, as well as get confirmation from you (as the case may require) that your request comes at your own initiative, in order for us to be able to process your request and send the requested fund information to you.

c. **visiting our website www.akj.com and www.akjtoken.com**

We gather on an automated basis technical data when you visit our website such as cookies and IP addresses.

Cookies

Website visitors may choose to accept or not the cookie use policy as stated on www.akj.com and www.akjtoken.com by clicking on the cookie notification bar that is displayed upon entering the website. AKJ's website uses both permanent and temporary session cookies. Temporary session cookies are only stored during your session on the website and deleted when you close down your web browser. A permanent cookie is a text file stored on your computer.

Please find below a description of the types of cookies that are in existence:

Process – Process cookies help make a website function and deliver the services that the website visitor expects to receive, such as navigation, access to secure areas etc. These cookies are necessary and without them the website will not function properly.

Preference – Preference cookies allow a website to remember a user's preferences in relation to the website such as language, font size, currency, region etc. These cookies are not vital but enhance a user's experience.

Security – Security cookies are used to authenticate users, prevent fraudulent use of login credentials, protect user data from unauthorised parties etc. These cookies are vital to the security of AKJ's website.

Analytics – Analytics cookies collect information in an anonymous form about how a user interacts with a website. This information may include: the number of users visiting the website, the pages a user visits the activity of the user on the website and how often the user returns.

How to change a cookie setting

In order to control your cookie settings and delete as applicable, you will have to access the settings section in your web browser. Within the settings section, there will be a sub-section called "privacy and security" or similar depending on the browser that you use. From there you can control and delete as applicable your saved cookies.

More information about cookies, please go to: allaboutcookies.org

IP addresses

Upon visiting AKJ's website our servers will record your IP address together with the date and time of your visit. An IP address is an assigned number, similar to a telephone number, which allows your computer to communicate over the internet. We will use your information for demographic and statistical purposes, including to determine the number of visitors to our websites in any given period, and to analyze patterns of use of our websites.

Clicking on one of AKJ's advertisements (such as text ads, web banners) used in online advertising.

The personal data we collect from visitors clicking on online advertisements, as defined under the GDPR, are cookie files and IP addresses.

AKJ online ads are displayed on Google browsers and on other publishers' websites according to Google's algorithms that take into account Campaign and Budget settings. Except Campaign default settings as defined by Google and selected by AKJ, AKJ has no influence on how and where the online ads will be displayed.

In its capacity of online advertiser by means of Google's AdWords Platform and Account, AKJ is subject to Google's Privacy Policy and Terms of Use on all associated Google Platforms.

5. Personal data from telephone recordings

All telephone conversations and electronic communications between you and us may be recorded and retained by us, and will be recorded where those conversations or communications, result or may result in the conclusion of a transaction in accordance with all relevant statutory or other regulatory requirements for such period specified from time to time in the applicable Regulations. Such records shall constitute conclusive evidence of the conversations, instructions or orders recorded.

6. Who do we share your personal data with?

In order to fulfil the purposes specified in section 3, but subject to applicable law relating to information sharing, we will only disclose your personal data to data processors appointed by AKJ and its or their duly appointed agents and any of their respective related, associated or affiliated companies; as well as service providers which perform services on AKJ's behalf; Financial, taxation, regulatory or judicial authorities, state agencies or public bodies, upon request and to the extent permitted by law; and certain regulated professionals such as lawyers, notaries and auditors; and companies reviewing AKJ for Due Diligence purposes.

7. The Data Protection Principles

AKJ is classed as a Data Controller and Processor under GDPR. This statement confirms our commitment to protect your privacy and to process your Personal Data in accordance with the regulations. Such data will be processed and protected in accordance with GDPR's 7 principles in Article 5 of the regulation:

I. Lawfulness, fairness, and transparency

Personal Data will be processed lawfully, fairly and in a transparent manner.

II. Purpose limitations

Personal Data collected for a specified purpose will not be processed for any other purpose that is incompatible with that specified purpose, except where any specific exception applies.

III. Data minimization

Personal Data is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed. AKJ will ensure that it is not excessive.

IV. Accuracy

Personal Data needs to be accurate and where necessary kept up to date. AKJ will take every reasonable step to ensure that Personal Data is not inaccurate, having regard to the purposes for which it is processed, and thereafter erased or rectified without delay if applicable.

V. Storage limitations

Personal Data is kept in a form that permits identification of data subjects for no longer than is necessary for the processing purpose(s).

VI. Integrity and confidentiality

Personal Data is processed in a manner that ensures appropriate security of the data using appropriate technical or organization measures, including against unauthorized or unlawful processing, accidental loss, destruction or damage.

VII. Accountability

AKJ as controller is responsible for compliance with the Principles and can demonstrate that processing activities are compliant with these Principles.

8. Transfer of Personal data

Transfer of Personal Data provided to any country including countries outside the European Economic Area which may not have equivalent data protection laws to those in your jurisdiction, may take place for any of the purposes described in this policy. Where this is the case, we will put appropriate safeguards in place to protect the transferred Personal Data in accordance with the General Data Protection Regulation 2016/679, including the use of standard contractual clauses or such other methods as we consider appropriate for such transfers.

As stated above, we will only transfer your Personal Data outside of the EEA:

- where the transfer is to a place, or by a method or in circumstances that is regarded by the European Commission as providing adequate protection for your Personal Information. For example, where we have put in place standard data protection clauses adopted by the European Commission; or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defense of legal claims.

9. Confidentiality

We agree to take customary and reasonable precautions to maintain the confidentiality of all Personal Data by ensuring that our personnel engaged with processing of Personal Data is provided with the requisite training in relation to GDPR and the importance of confidentiality.

You acknowledge and agree that we may disclose from time to time Personal Data to our other offices, branches, subsidiaries, affiliates, units and Associated Companies.

10. Retention, return and deletion of data

AKJ and its third-party providers shall ensure that Personal Data is retained in accordance with the applicable regulations and/or in accordance with GDPR as applicable. It is our policy to retain your Personal Information for the length of time required for the specific purpose or purposes for which it was collected. However, we may be obliged to store some Personal Information for a longer time, taking into account factors including:

- legal obligation(s) under applicable law to retain data for a certain period of time;
- statute of limitations under applicable law(s);
- (potential) disputes and
- guidelines issued by relevant data protection authorities

Whilst we continue to process your Personal Information, we will ensure that it is treated in accordance with this Privacy Policy. Otherwise, we securely erase your information once this is no longer needed.

AKJ will promptly respond to a request by a Data Subject to view and/or return and/or delete its data.

We will generally respond to your request within one month of receipt of your request. We can extend this period by an additional two months if this is necessary taking into account the complexity and number of requests that you have submitted:

- you request additional copies of your Personal Information undergoing processing, in which case we may charge for our reasonable administrative costs, or
- you submit manifestly unfounded or excessive requests, in particular because of their repetitive character, in which case we may either: (a) charge for our reasonable administrative costs; or (b) refuse to act on the request

11. Your rights

Processing of Personal Data shall be collected, processed and retained in a form that meets the “Principles relating to processing of personal data” in Article 5 of GDPR. AKJ will take all appropriate measures and make available to you information retained on you as required in the applicable legislation. You shall have a right to rectify inaccurate Personal Data concerning you

and have the right to request for the erasure of Personal Data concerning you. You further have the right to object to any Data Processing in accordance with article 18 of the GDPR.

The following section explains your rights. The various rights are not absolute and each is subject to certain exceptions or qualifications. We will grant your request only to the extent that it follows from our assessment of your request that we are allowed and required to do so under data protection laws. Nothing in this Privacy Policy is intended to provide you with rights beyond or in addition to your rights as a data subject under data protection laws.

Your Rights – What does this mean?

1. The right to be informed

You have the right to be provided with clear, transparent and easily understandable information about how we use your Personal Information and your rights. This is why we are providing you with the information in this Privacy Notice.

2. The right of access

You have the right to obtain a copy of your Personal Information (if we are processing it), and other certain other information (similar to that provided in this Privacy Notice) about how it is used. This is so you are aware and can check that we are using your information in accordance with data protection law. We can refuse to provide information where to do so may reveal Personal Information about another person or would otherwise negatively impact another person's rights.

3. The right to rectification

You can ask us to take reasonable measures to correct your Personal Information if it is inaccurate or incomplete, e.g. if we have the wrong name or address for you.

4. The right to erasure

This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of your Personal Information where there's no compelling reason for us to keep using it or its use is unlawful. This is not a general right to erasure; there are exceptions, e.g. where we need to use your Personal Information in defence of a legal claim.

5. The right to restrict processing

You have rights to 'block' or suppress further use of your Personal Information when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your Personal Information, but may not use it further. We keep lists of people who have asked for further use of their Personal Information to be 'blocked' to make sure the restriction is respected in future.

6. The right to data portability

You have rights to obtain and reuse certain Personal Information for your own purposes across different organisations.

7. The right to object

You have the right to object to certain types of processing, on grounds relating to your particular situation, at any time insofar as that processing takes place for the purposes of legitimate

interests pursued by us or by a third party. We will be allowed to continue to process your Personal Information if we can demonstrate “compelling legitimate grounds for the processing which override your interests, rights and freedoms” or we need this for the establishment, exercise or defence of legal claims.

12. Your Consent

You specifically authorise that we may use, store or otherwise process any Personal Data in accordance with GDPR (whether provided electronically or otherwise) and may disclose any such Data (including, without limitation, information relating to your transactions and accounts) either as we or any of our relevant Associated Companies shall be obliged or requested to under or pursuant to any Applicable Rules or by any regulatory authority (including any tax authority) or as may be required to administer GDPR, in order to provide services to you.

13. Contact Us

For any questions you may have on how AKJ processes your data, please contact compliance@akj.com or at [49 Grosvenor Street, Mayfair, London, UK, W1K3PH](#).

You have the right to lodge a complaint with us in relation to our use of Personal Data by sending an email to compliance@akj.com or with the relevant supervisory authority under the General Data Protection Regulation 2016/679 which shall be the Information Commissioner’s Office (<https://ico.org.uk/>) in the UK or the equivalent national regulator in any EU country.