

Privacy Notice

AZR Capital LTD (“AZR Capital” “we”, “us”) is committed to protecting the privacy and security of your personal information. This Privacy Notice explains how we may utilize Personal Data in connection with your interest in our services and/or our working relationship with you in accordance with applicable laws including the General Data Protection Regulation (“GDPR”) effective as of 25 May 2018 (together “Data Protection Legislation”).

This notice applies to prospective, current and former clients, employees and contractors of AZR Capital, as well as those with a general or ongoing interest with us. It does not form any part of a contract for services or employment.

AZR Capital as Data Controller

For the purposes of Data Protection Legislation AZR Capital is a “data controller”. This means we are both responsible and accountable for how we hold and use personal data that we may have about you.

What is Personal Data?

“Personal Data” means any information relating to you by which you may be identifiable such as:

- Information about your identity, such as your name, address, e-mail address, phone number, company name and job title;
- Information about your personal financial profile, such as your risk tolerance levels, goals and objectives, assets, liabilities, savings and investments.
- Where such personal information is held by us, it is held solely for the purpose of conducting our financial services business.

When we use the term “Services” we mean to refer collectively to:

- The provision of financial advisory and fund placement services to our clients and prospective clients (“Client Services”)

The majority of our clients are corporate entities and data about entities is not personal data. But we do process personal data of company employees, representatives and other personal data clients provide to us, or allow us to collect on their behalf, while providing the Client Services. This includes contact information and any other personal data that is relevant to or necessary for us to perform a proper background check, or a required “Anti-Money Laundering” or “Know Your Customer” background check, or otherwise to deliver the Client Services

Usage of Information

We will only use your Personal Data in lawful circumstances. Most commonly in the following circumstances:

- The performance of our contractual obligations with you;
- To comply with our legal obligations;
- Where you have consented for us to do so; or
- If we (or a third party) have a legitimate interest which is not overridden by your interests or fundamental rights and freedoms.

What Sources We Obtain Your Information From:

We collect and process personal data about a number of different individuals through the provision of the Services. These individuals include our individual clients and prospective clients, their representatives, visitors to our offices, visitors to our Sites, vendors, and other individuals.

Privacy Notice Amendments and Updates

We will continue to conduct our business in a manner that conforms with our pledge to you, your expectations and all applicable laws; however, our policy about obtaining and disclosing information may change from time to time. We will provide you with notice of any material change to this policy before we implement the change.

Principles for the Protection of your Personal Data

AZR Capital will comply with applicable Data Protection Legislation. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes
- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

How we use sensitive personal information

We need to have strong justifications for collecting, storing and use of sensitive Personal Data. We have in place an appropriate policy document and safeguards which we are required by law to maintain when

processing such data. We may process special categories of personal information in the following circumstances:

- Where we need to carry out our legal obligations or exercise rights in connection with employment.
- We may possibly also process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

We may also process such information about current or former employees or candidates in the course of legitimate business activities paying due care and attention to the appropriate safeguards. Such processing will as a rule be kept to the absolute minimum.

With whom will we share your information?

When using your Personal Data for the purposes and on the legal basis described above we may share your Personal Data amongst service providers we work with. We may also, as a matter of law, have to share your Personal Data with regulators, public institutions, courts or other third parties, always in accordance with EU laws and other applicable laws and regulations on data protection.

Your rights in relation to your information

You have rights as an individual which you can exercise under certain circumstances in relation to your Personal Data that we hold. These rights are to:

- Request access to your Personal Data (commonly known as a "data subject access request") and request certain information in relation to its processing;
- Request rectification of your Personal Data;
- Request the erasure of your Personal Data;
- Object to the processing of your Personal Data.

If you want to exercise one of these rights, please contact

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, or, as the case may be, any other competent supervisory authority.

How long will we retain your information?

We will only retain your Personal Data for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.



To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

Upon expiry of the applicable retention period we will securely destroy your Personal Data in accordance with applicable laws and regulations.

How to contact us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us. You can do this by writing to us at:

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