

PRIVACY NOTICE

1. INTRODUCTION

EMKAP UK Ltd ("EMKAP UK", "we", "us" or "our") is committed to protecting the privacy and security of the personal data we process. This Privacy Notice explains how we collect, use, store, share and protect your personal data when you interact with us or use our products and services. It also explains your rights under applicable UK data protection legislation and how you can exercise them.

We process personal data in accordance with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and other applicable data protection laws. As an authorised and regulated investment firm, we also process personal data to comply with our legal and regulatory obligations, including anti-money laundering, counter-terrorist financing, sanctions, tax reporting and financial services legislation.

2. WHO WE ARE

EMKAP UK is a company registered in England and Wales under company number 09779913. We are authorised and regulated by the Financial Conduct Authority (FCA) under Firm Reference Number: 720609.

Principal place of business and registered office:

Address: 9-10 Domingo Street, London, EC1Y 0TA, United Kingdom

Telephone: +44 20 3950 5971

Email: info@emkap.co.uk

Website: <https://emkap.com/>

EMKAP UK Ltd is the data controller in respect of the personal data described in this Privacy Notice. We determine how and why your personal data is processed and are registered with the Information Commissioner's Office ("ICO") under registration number **ZA219257**.

Data Protection Contact:

If you have any questions about this Privacy Notice or wish to exercise your rights under UK data protection legislation, please contact our Compliance Department:

Email: compliance@emkap.co.uk

Telephone: +44 203 865 0430

3. WHAT CATEGORIES OF PERSONAL DATA DO WE COLLECT?

The categories of personal data we collect depend on the nature of our relationship with you and the services we provide. We may collect and process the following categories of personal data:

- identity information, including your name, date of birth, nationality and copies of passports, national identity cards or driving licenses;
- contact information, including your residential address, correspondence address, email address and telephone numbers;
- financial and tax information, including bank account details, tax identification numbers, National Insurance numbers, personal tax reference numbers and other tax residency information;
- employment and professional information, including occupation, employer, job title and employment status;
- know your customer ("KYC") and financial crime information, including source of funds, source of wealth, politically exposed person ("PEP") status, sanctions screening results, adverse media checks and other information required to meet our regulatory obligations;
- verification information, including proof of address documents, bank statements and other documents used to verify your identity or residential address;
- transaction and account information, including records relating to accounts, transactions, communications and instructions provided to us;
- communications and correspondence, including emails, telephone calls letters and other communications between you and EMKAP UK.

4. HOW DO WE COLLECT PERSONAL DATA?

We collect personal data directly from you when you:

- apply for our products or services;
- Enter into, or seek to enter into, a contractual relationship with us;
- Complete onboarding documentation, application forms or questionnaires;
- Communicate with us by telephone, email, post, our website or other electronic means; or
- Provide information during the course of our business relationship.

We may also obtain personal data from third parties where permitted or required by law, including:

- Registrar of Companies
- Regulatory bodies
- Bankruptcy databases
- Published articles

5. SOURCES OF INFORMATION

The personal data we process may be obtained from a variety of sources, including:

- client and counterparty onboarding forms;
- know your customer ("KYC") questionnaires;
- customer due diligence ("CDD") documentation;
- identification documents (such as passports, national identity cards and driving licences);
- Proof of address documents;
- bank statements and other financial documentation;
- tax documentation and declarations;
- communications and correspondence with you;
- third-party verification, compliance, sanctions and AML screening providers;
- publicly available registers and regulatory databases.

6. LAWFUL BASIS FOR PROCESSING PERSONAL DATA

EMKAP UK processes personal data only where we have a lawful basis to do so under the UK General Data Protection Regulation ("UK GDPR"). Depending on the purpose of processing, we rely on one or more of the following lawful bases:

- **Legal Obligation:** To comply with anti-money laundering, counter-terrorist financing, sanctions, tax reporting and other legal or regulatory obligations;
- **Performance of a Contract:** To establish, manage, and fulfil our contractual relationship with you;
- **Legitimate Interests:** Where processing is necessary for our legitimate business interests, provided these are not overridden by your rights and freedoms;
- **Consent:** Where required for specific activities

7. HOW WE USE YOUR PERSONAL DATA

We process personal data only for legitimate business purposes and in accordance with applicable legal and regulatory requirements. We do not sell your personal data. We may use your personal data to:

- provide our products and services;
- establish and manage our relationship with you;
- verify your identity and conduct KYC, AML, sanctions and fraud prevention checks;
- comply with our legal, regulatory and tax obligations;
- process transactions and administer your account;
- communicate with you regarding our services;
- protect our legal rights and prevent fraud or financial crime; and
- maintain appropriate records, governance and business operations.

8. INTERNATIONAL TRANSFERS OF DATA

As part of providing our services, your personal data may be transferred to, stored in or accessed from countries outside the United Kingdom.

Where we transfer personal data internationally, we ensure that appropriate safeguards are in place in accordance with UK GDPR. These safeguards may include:

- transfers to countries recognised as providing an adequate level of protection;
- the UK International Data Transfer Agreement ("IDTA");
- the UK Addendum to the European Commission's Standard Contractual Clauses; or

- any other lawful transfer mechanism permitted under applicable data protection legislation.

You may contact us if you require further information regarding the safeguards applied to international transfers.

9. YOUR RIGHTS UNDER GDPR

Subject to applicable law, you have the following rights:

- right to access – request access to your personal data
- right to rectification – correct incomplete or inaccurate data
- right to data portability – receive your data in a commonly used format and transfer it to another controller
- right to object – object to processing based on legitimate or public interest
- right to restriction – restrict processing under certain circumstances
- right to withdraw consent – withdraw your consent at any time

To exercise your rights, contact us at: compliance@emkap.co.uk

We may require verification of your identity to process your request securely.

10. DATA RETENTION

EMKAP UK retains personal data only for as long as necessary to fulfil the purposes for which it was collected, including to meet legal, regulatory, tax, accounting, and business requirements. Once personal data is no longer required, it is securely deleted or destroyed in accordance with the firm's Data Retention Policy

11. CONSEQUENCES OF NOT PROVIDING YOUR PERSONAL DATA

Providing your personal data is necessary for us to establish and maintain a relationship with you. Without it, we may not be able to offer our services. We may also request further information to confirm your identity and protect your data.

12. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice periodically to reflect changes in our privacy practices or applicable laws.

The most recent version of this Privacy Notice will always be available on our website at www.emkap.com. We encourage you to review this notice periodically to remain informed about how we protect your personal data.

13. LODGING A COMPLAINT

EMKAP UK processes personal data in accordance with this notice and applicable laws. If you are dissatisfied with how we handle your personal data, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) , the UK's independent supervisory authority for data protection matters:

Information Commissioner's Office

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

Email: casework@ico.org.uk

Website: <https://ico.org.uk>