

PRIVACY STATEMENT

Page Asset Management Limited (PAML) is committed to ensuring that the personal information we retrieve from you is protected and respected. This privacy notice is to let you know how PAML promises to look after your personal information. This includes what you tell us about yourself and what we learn by having you as a client, investor, supplier, or business. This notice also tells you about your privacy rights and how the law protects you, the information we collect about you, and how we process it.

1. Information that you provide:

We collect your information when you complete our client onboarding/KYC forms, when you give us your business card (or similar), or when you correspond with us by telephone, post, email, or otherwise. The information we receive may include your name, email address, telephone number, profession, background, interests, geographical location, employee details (for organizations), tax identification number, bank account details, and any information about your business relationship with PAML that you may directly or indirectly provide.

2. Information that our website and other systems collect about you:

At times when you visit our website, we may automatically retrieve information about your Internet protocol (IP) address, browser type and version, and the pages on our site that you visit. In addition, when you exchange emails, telephone conversations, or other electronic communications with our employees and other staff members, our information technology systems may record details of those conversations, sometimes including their content. Some of our premises have closed circuit TV systems which may record you if you visit our premises, for security and safety purposes.

3. Other information:

We may also collect some information from other sources. For example: If we have a business relationship with the organization that you represent, your colleagues or other business contacts may give us information about you such as your contact details or details of your role in the relationship. We sometimes collect information from third-party data providers or publicly available sources for anti-money laundering, background checking, and similar purposes, and to protect our business and comply with our legal and regulatory obligations.

4. How we use your information:

We may use your information for any of the following purposes:

1. To operate, manage, develop, and promote our business and, in some instances, our relationship with the organization you represent (if any) and related transactions – this includes, for example, deal announcements, billing/payment, and marketing purposes;
2. To operate, administer and improve our websites and premises and other aspects of how we conduct our operation;
3. To protect the security of our premises;
4. To protect our business from fraud, money laundering, breach of confidence, theft of proprietary materials, and other financial or business crimes; and
5. To comply with our legal or regulatory obligations and to bring and defend legal claims.

We may from time to time review information about you held in our systems – including the contents of and other information related to your email and other communications with us – for compliance and business-protection purposes as described above. This may include reviews for disclosure of information relevant to litigation and/or reviews of records relevant to internal or external regulatory or criminal investigations. To the extent permitted by applicable law, these reviews will be conducted reasonably and proportionately and approved at an appropriate level of management. They may ultimately involve the disclosure of your information to governmental agencies and litigation counterparties as described below.

We will only process your personal information as necessary so that we can pursue the purposes described above, and then only where we have concluded that our processing does not prejudice you or your privacy in a way that would override our legitimate interest in pursuing those purposes. In exceptional circumstances, we may also be required by law to disclose or otherwise process your personal information. We will tell you, when we ask you to provide information about yourself if the provision of the requested information is necessary for compliance with a legal obligation or, on the other hand, if it is purely voluntary and there will be no implications if you decline to provide the information. Otherwise, you should assume that we need the information for our business or compliance purposes (as described above). If you are uncertain as to PAML's need for the information that we request from you, please contact the PAML representative requesting the information, or contact us (see below), with your query.

5. Disclosure and international transfer of your information:

We may disclose personal information about you, where reasonably necessary for the various purposes set out:

1. amongst affiliates and subsidiaries within the Page group;
2. to service providers who host our websites or other information technology systems or otherwise hold or process your information on our behalf, under strict conditions of confidentiality and security;
3. to partners who run any events that you sign up for through our websites
4. to business partners, suppliers, and sub-contractors for the performance of any contract, we enter into with, them or you
5. to a person who takes over our business and assets, or relevant parts of them; or
6. in exceptional circumstances:
 - to competent regulatory,
 - prosecuting and other governmental agencies,
 - or litigation counterparties, in any country or territory;
 - or where we are required by law to disclose.

These disclosures may involve transferring your personal information overseas. If you are dealing with us within the European Economic Area (or the UK, after it has left the European Economic Area), you should be aware that this may include transfers to countries outside the European Economic Area / UK, which do not have similarly strict data privacy laws. In those cases, where we transfer personal data to other members of the PAML group or our service providers, we will ensure that our arrangements with them are governed by data transfer agreements, designed to ensure that your personal information is protected, on terms approved for this purpose by the European Commission. Please Contact us (see below) if you would like to know whether any such agreements are in place or, if so, to see a copy.

6. Retention and deletion of your information

We will delete the information that we hold about you when we no longer need it.

Note that we may retain some limited information about you even when we know that you are no longer a client or an employee so that we can maintain a continuous relationship with you if and when we are in contact with you again.

7. Your rights

Under current data protection law, you are afforded rights in relation to our use of your information. These rights include:

1. The right to object – This allows you to object to us keeping or using your personal information for direct marketing purposes at any time and you may have the right to object to our processing of some or all of your personal information (and require them to be deleted or updated where inaccurate).
2. The right to be forgotten – “This allows you to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. However, there may be legal or other official reasons why we need to keep or use your data. If you wish to exercise any of these rights, please contact us as set out below.
3. The right to restrict the use of your data – We may sometimes be able to restrict the use of your data. This means it can only be used for certain things, such as legal claims or to exercise legal rights. You can ask us to restrict the use of your personal information if:
 - It is not accurate;
 - It has been used unlawfully but you don't want us to delete it;
 - It is not relevant anymore, but you want us to keep it for use in legal claims; and
 - You have already objected to us processing your data, but we are considering whether we have legitimate grounds to process your data that override your right to restriction.
 - If we do restrict your information in this way, we will not use or share it in other ways while it is restricted.

If you wish to exercise any of these rights, please contact us as set out below.

8. Contact us

Please email us at info@pageaml.com for any questions, comments, or requests you may have concerning the processing of personal information.

9. Changes to this policy

Any changes we make to this privacy statement in the future will be posted on our website (www.pageaml.com)