

PRIVACY NOTICE

1. INTRODUCTION

- 1.1 This Privacy Notice sets out how personal information is collected, processed and disclosed in connection with the Aventus Protocol Foundation (the "**Foundation**").
- 1.2 As a result of a proposed or actual transaction with the Foundation either made by you or a firm or entity with which you have a connection (the "**Aventus Staker**"), your personal information and/or the personal information of other relevant individuals of the Aventus Staker (such as directors, officers, employees or beneficial owners) (together, the "**Relevant Individuals**") may be provided to the Foundation and its service providers.
- 1.3 The Foundation will act as data controller, in respect of its use of personal information about Relevant Individuals. In this Privacy Notice, "the Foundation", "**we**" or "**us**" refers to the Foundation and "**you**" refers to the Relevant Individual.
- 1.4 Service providers appointed by the Foundation (as referred to in the Foundation's Terms and Conditions) may also process personal information relating to Relevant Individuals when conducting administrative and other activities relating to the Foundation. Where they are required to do so in order to comply with their own legal and regulatory obligations, they will do so as data controllers in their own right.
- 1.5 This Privacy Notice sets out how the personal information of Relevant Individuals is collected, processed and disclosed in connection with the activities of the Foundation. Unless otherwise provided for in this Privacy Notice, terms and expressions defined in the Foundation's Terms and Conditions shall have the same meaning where used in this Privacy Notice.

2. THE PERSONAL INFORMATION WE PROCESS

- 2.1 We may collect various types of personal data about you, including:
 - 2.1.1 identification information (which may include your name, IP address and personal data relating to claims, court cases and convictions, politically exposed person (PEP) status, personal data available in the public domain and such other information as may be necessary for the Company and its service providers to perform their functions and comply with their processes and discharge AML/CFT obligations);
 - 2.1.2 contact information (which may include postal address and e-mail address and your home and mobile telephone numbers);
 - 2.1.3 professional and employment information (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold); and

2.1.4 financial information, sources of wealth and your assets (which may include your Ethereum Public Key, holding of AVT and/or details of your interests in the Foundation).

2.2 We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.

3. **WHERE WE OBTAIN YOUR PERSONAL INFORMATION:**

3.1 We collect personal information from the following sources:

3.1.1 personal information which you provide to us or which is given to us by the Aventus Staker, including but not limited to:

- (a) such forms and documents as we may request that are completed in relation to the Foundation;
- (b) information gathered through client due diligence carried out as part of our compliance with regulatory requirements; or
- (c) any personal information provided by way of correspondence with us by phone, e-mail or otherwise;

3.1.2 personal information we receive from third party sources, such as:

- (a) entities in which you or someone connected to you has an interest;
- (b) your legal and/or financial advisors;
- (c) other financial institutions who hold and process your personal information; and
- (d) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and

3.1.3 personal information received in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

4. **WHY WE COLLECT YOUR PERSONAL INFORMATION:**

Lawful grounds for processing:

4.1 We may hold and process your personal information on the following lawful grounds, namely where:

4.1.1 the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;

- 4.1.2 the processing is necessary to comply with our respective contractual duties to the Aventus Staker under the terms of the Foundation's Terms and Conditions and any supplemental agreements thereto;
- 4.1.3 the processing is necessary to comply with our legal and regulatory obligations;
- 4.1.4 (on rare occasions) where we have obtained consent to processing personal information for a specific purpose; and
- 4.1.5 on rare occasions, where it is needed in the public interest.

Purposes of processing

- 4.2 Pursuant to paragraph 4.1 above, personal information may be processed for the purposes set out below ("**Purposes**"). The Purposes based on our legitimate interests are set out in paragraphs 4.2.1 to 4.2.3 inclusive):
 - 4.2.1 facilitating the administration of the Foundation and its service providers;
 - 4.2.2 communicating with data subjects as necessary in connection with the contract between the Aventus Staker and the Foundation;
 - 4.2.3 monitoring and recording telephone and electronic communications and transactions:
 - (a) for quality, business analysis, training and related purposes in order to improve service delivery; and
 - (b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);
 - 4.2.4 to comply with the legal, regulatory, reporting and/or financial obligations of the Foundation or any legal or regulatory obligations of any service provider or functionary (or his/her employer) of the Foundation;
 - 4.2.5 disclosing your personal information to any bank, financial institution or other third party lender providing any form of facility, loan, finance or other form of credit or guarantee to the Foundation;
 - 4.2.6 to enforce or defend the rights of the Foundation, or those of third parties who provide services to the Foundation;
 - 4.2.7 collecting, processing, transferring and storing customer due diligence, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations; and
 - 4.2.8 liaising with or reporting to any regulatory authority (including tax authorities) with whom

we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate in relation to an investment, and which has jurisdiction over the Foundation or its investments.

5. SHARING PERSONAL INFORMATION

- 5.1 We may share your personal information with our group companies and third party service providers, including those referred to in the Foundation's Terms and Conditions, banks, financial institutions or other third party lenders, IT service providers, auditors and legal professionals to facilitate the running of the Foundation. The third party service providers to whom your information may be transferred are based in the following jurisdictions: Jersey and the UK.
- 5.2 Where we share your information with a third party, we require the recipients of that personal information to put in place adequate measures to protect it.
- 5.3 Where we transfer your personal information outside the European Economic Area, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:
 - 5.3.1 the country to which we send the personal information may be approved by the European Commission as providing adequate protection for personal data; or
 - 5.3.2 by utilizing a contract based on “model contractual clauses” approved by the European Commission.
- 5.4 In other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA.
- 5.5 If you would like further information about sharing personal information, and about the safeguards we have in place to protect your personal information, please contact dpo@aventus.io.

6. RETENTION OF PERSONAL INFORMATION

- 6.1 Your personal information will be retained for as long as required:
 - 6.1.1 for the Purposes for which the personal information was collected;
 - 6.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
 - 6.1.3 as required by data protection laws and any other applicable laws or regulatory requirements.

7. ACCESS TO AND CONTROL OF PERSONAL INFORMATION

- 7.1 You have the following rights in respect of the personal information about you that we process:

- 7.1.1 the right to access and port personal information;
 - 7.1.2 the right to rectify personal information;
 - 7.1.3 the right to restrict the use of personal information;
 - 7.1.4 the right to request that personal information is erased; and
 - 7.1.5 the right to object to processing of personal information.
- 7.2 You also have the right to lodge a complaint about the processing of your personal information either with us, with the Office of the Information Commissioner in Jersey (<https://oicjersey.org/>) or the data protection authority in the EU member state of your usual residence or place of work.
- 7.3 Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.
- 7.4 If you wish to exercise any of the rights set out in this paragraph 7, please contact dpo@aventus.io.

8. **INACCURATE OR AMENDED INFORMATION**

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon the Foundation's ability to provide services. Failure to provide information where it is required for anti-money laundering or other legal requirements means that we may not be able to proceed with transactions in relation to the Aventus Staker.

9. **QUESTIONS**

- 9.1 If you have any questions about this Privacy Notice or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact dpo@aventus.io.
- 9.2 This Privacy Notice is up-to-date as of 1 January 2021. If it is updated, we will provide the Aventus Staker with the updated version and require them to bring it to your attention.