



Asset Management One International Ltd.

Privacy Notice

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1 Introduction

1.1 Definitions, Acronyms and Abbreviations

The following acronyms and abbreviations are used throughout this document

Affiliate	Any entity owned by Asset Management One Co., Ltd.; Asset Management One International Ltd., Asset Management One USA Inc., Asset Management One Singapore Pte. Ltd., Asset Management One Hong Kong Limited.
AMOI	Asset Management One International Ltd.
Personal Data	<p>any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier including, but not limited to:</p> <ul style="list-style-type: none"> • A Name (First Name, Last Name, Alias); • An identification number (including, but not limited to, Passport number, Employee Number or Driving License Number); • An online identifier; • Location data (home or work addresses); • Contact information (telephone numbers, email addresses); • Photographs and biometric data; • one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
Staff	Refers to employees, temporary workers, contractors and 3 rd party consultants.

1.2 Purpose

For the purposes of data protection law, Asset Management One International Ltd. (AMOI) is a data controller in respect of your Personal Data. AMOI is responsible for ensuring that it uses your Personal Data in compliance with data protection law.

AMOI is registered in the UK and its registered address is at Mizuho House, 30 Old Bailey, London, England, EC4M 7AU and its company registration number is 3472865.

This Privacy Notice applies if AMOI processes Personal Data of contractors, contractors, market participants and clients. The Privacy Notice sets out the basis on which any Personal Data about you that you provide to AMOI, that AMOI creates, or that AMOI obtains about you from other sources, will be processed by AMOI. Please take the time to read and understand this Privacy Notice.

1.3 Types of Personal Data collected

AMOI collects and processes the following Personal Data about you:

- Contact details (including address, telephone numbers, email addresses);

- Individuals' names;
- Personal identifiers (including tax codes, national identification references, National Insurance numbers, bank account details and passport numbers);
- Photographs;
- Information about our business relationship with you;
- Professional information (including job title, role, department)
- Communication preferences (including preferred language)
- Vendor contact and sub-contractor details;
- Data subject details associated with the author or modifier of electronic records.

1.4 Purpose of Processing the Personal Data

Your Personal Data may be stored and processed by AMOI in the following ways and for the following purposes:

- Allowing AMOI to provide services to you;
- Backup retention and management supporting business continuity;
- Contacting you as part of the conduct of normal business;
- Providing an audit trail relating to the conduct of normal business; and
- For operation and maintenance purposes, IT applications and infrastructure.

AMOI is entitled to use your Personal Data in these ways because:

- the performance of AMOI's obligations under its contract with you (otherwise AMOI may not be able to fulfil its obligations and provide services to you);
- AMOI has legal and regulatory obligations that it has to discharge;
- AMOI may need to in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings; or
- the use of your Personal Data as described is necessary for AMOI's legitimate business interests (or the legitimate interests of one or more of AMOI's affiliates), such as:
 - Accounting;
 - Administration of employee benefits;
 - Book Maintenance;
 - Business Continuity Planning;
 - Change Management;
 - Payroll processing;
 - Provision of employee medical and life insurance;
 - Purchasing and procurement;
 - Recruitment and Human Resource administration;
 - Regulatory monitoring and administration;

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| - Collateral Management and Treasury operations; | - Regulatory reporting; |
| - Communications (telephones, intranet, internet, emails); | - Risk Management; |
| - Compliance checks and conflict monitoring; | - Risk Management and Reporting; |
| - Data Management and Governance; | - Sales and Trading and Order Management; |
| - Enterprise Collaboration and Mobility | - Sales Credit and Commission Management Reporting; |
| - Accounts Payable processing; | - Sanctions, KYC and AML screening; |
| - Fraud prevention; | - Staff record keeping; |
| - Health and Safety management; | - Staff training; |
| - Information Security management and administration; | - Trade Affirmation and Clearing; |
| - IT controls; | - Travel and Entertainment; |
| - IT Disaster Recovery and BCP Plan Management; | - Travel Bookings; |
| - Legal management; | - User access verification; |
| - Mobile device management and service provision; | |

1.5 Third party recipients of personal data

AMOI may disclose your Personal Data to its affiliates. AMOI will take steps to ensure that the Personal Data is accessed only by staff of such affiliates that have a need to do so for the purposes described in this Privacy Notice.

AMOI may also share your Personal Data outside of AMOI and its affiliates:

- to AMOI vendors and market participants;
 - if AMOI sells any of its business or assets, in which case AMOI may disclose your Personal Data to the prospective buyer for due diligence purposes;
- if AMOI is acquired by a third party, in which case Personal Data held by AMOI about you will be disclosed to the third party buyer;
- to third party agents or contractors for the purposes of providing services to AMOI. These third parties will be subject to confidentiality requirements and they will only use your Personal Data as described in this Privacy Notice; and
- to the extent required by law, for example if AMOI is under a duty to disclose your Personal Data in order to comply with any legal obligation, establish, exercise or defend its legal rights.

1.5.1 Transfer of personal data to a third country

The Personal Data that AMOI collects from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by staff operating outside of the EEA who work for AMOI’s affiliates or for one of AMOI’s suppliers.

Where AMOI transfers your Personal Data outside the EEA, it will ensure that it is protected in a manner that is consistent with how your Personal Data will be protected by AMOI in the EEA. This can be done in a number of ways, for instance:

- the country that AMOI sends your Personal Data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your Personal Data; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit AMOI to otherwise transfer your Personal Data outside the EEA. In all cases, however, AMOI will ensure that any transfer of your Personal Data is compliant with data protection law.

You can obtain more details of the protection given to your Personal Data when it is transferred outside the EEA (including a copy of the relevant safeguards) by contacting AMOI as set out in section 1.7.

1.5.2 Technical and organisational security measures

AMOI ensures that suitable contractual arrangements are in place with third parties such that safeguards equivalent to AMOI’s are in place for the processing of your Personal Data.

1.5.3 Retention time

Personal Data is kept for the time necessary to provide the services to the User or to fulfil legal, contractual or ongoing business interests. Once the purpose for processing the Personal Data has been discharged AMOI shall keep such Personal Data no longer than is necessary, subject to any laws or regulations that may set a minimum period for which AMOI has to keep your Personal Data.

1.6 The Rights of Data Subjects

Subject to applicable exemptions, you have the right, at any time:

- to obtain information regarding the processing of your Personal Data and access to the Personal Data which AMOI holds about you;
- where it was basis of AMOI processing your Personal Data, to withdraw your consent to AMOI processing your Personal Data at any time;
- to receive some Personal Data in a structured, commonly used and machine-readable format and/or request that AMOI transmits those data to a third party where this is technically feasible;
- to request that AMOI rectifies your Personal Data if it is inaccurate or incomplete;

- to request that AMOI erase your Personal Data;
- to object to, and the right to request that AMOI restricts its processing of your Personal Data; and
- to lodge a complaint with the data protection regulator if you think that any of your rights have been infringed by AMOI.

You can exercise these rights by contacting AMOI as detailed in section 1.7. You can find out more information about your rights by contacting the Information Commissioner's Office, or by searching their website at <https://ico.org.uk/>.

1.7 Contact

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or the exercise of any of the rights listed above, please address questions, comments and requests to:

Asset Management One International Ltd.
Mizuho House
30 Old Bailey
London
EC4M 7AU

Contact email: info@am-one-int.co.uk

1.8 Changes to this Privacy Notice

AMOI reserves the right to make written changes to this Privacy Notice at any time. If AMOI makes any changes, they will be updated on the Asset Management One International website: www.am-one-int.co.uk