

Introduction

This Notice describes how Monoceros (defined below) collates, uses and shares data and information about you while operating our business.

In this Notice, where we refer to "**Monoceros**" (or "**we**"/"**us**"/"**our**"), we mean:

- ♦ Monoceros Innovation Advisory Limited "**MIAL**"; and
- ♦ Emma German t/a Monoceros Law "**ML**", as the context requires.

MIAL is an innovation consultancy operating in the Island of Jersey.

ML is a Jersey legal practice operating in the Island of Jersey.

This Notice describes how we collect and use personal information about you during and after your relationship with us pursuant to the Data Protection (Jersey) Law 2018 ("**DPJL**").

Where you instruct MIAL, MIAL is a "Data Controller", which means MIAL is responsible for deciding how MIAL hold and use personal information. MIAL are registered with the Jersey Office of the Information Commissioner ("**JOIC**") with registration number 70446.

Where you instruct ML, Emma German trading as "Monoceros Law" is a "Data Controller", which means ML is responsible for deciding how ML hold and use personal information. ML is registered with JOIC with registration number 101266.

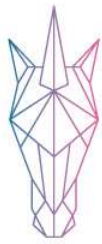
Monoceros have internal data sharing arrangements and it is possible that MIAL act as process to ML and vice versa as detailed further below.

In whichever capacity, we will comply with the DPJL, the principles of which 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 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 your data only as long as necessary for the purposes we collected it.

Kept securely.

References in this Notice to "**your information**" are also to personal information that you provide to us or which we otherwise gather in the course of operating our business.



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Data Protection Officer ("DPO")

We have appointed a DPO to oversee compliance with this Notice.

If you have any questions about this Notice or how we handle your personal information, contact the DPO at dpo@monoceros.co.uk.

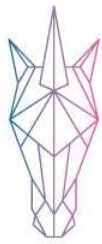
You have the right to make a complaint at any time to JOIC.

Contact details for Monoceros and JOIC are included at the bottom of this Notice.

The data we collect

We may collect various types of personal data about you, including:

- ♦ your personal identification information (which may include your name and passport information, your IP address, geolocation information 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 Monoceros to provide its services and to complete its customer due diligence (CDD) processes and discharge its Anti-money laundering/Countering the Financing of Terrorism/Proliferation Financing AML/CFT obligations ("AML/CFT/PF"))
- ♦ your contact information (which may include postal address and e-mail address and your home and mobile telephone numbers)
- ♦ your family relationships (which may include your marital status, the identity of your spouse and the number of children that you have)
- ♦ your 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)
- ♦ financial information, sources of wealth, sources of funds and your assets (which may include details of your assets, sources of wealth, shareholdings and your beneficial interest in assets, your bank details, crypto wallets and your credit history)
- ♦ information about client matters which may include personal information such as information about employment, health, travel and regulatory status
- ♦ 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
- ♦ if you apply for a position with us we may collect personal information relating to your past employment, professional qualifications and education, your nationality and immigration/residential status, opinions from third parties about you (such as references) and other details about you which may be gathered during the recruitment process.



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- ♦ we may also review publicly available information about you on your social media accounts.

Where we obtain your personal data

We collect your personal information from the following sources:

- ♦ personal information which you give to us, such as:
 - ♦ forms and documents as we may request that are completed in relation to the administration/management of any of our services
 - ♦ information gathered through client due diligence carried out as part of our compliance with regulatory requirements whether directly or indirectly (including via our agents and e-ID and verification service providers appointed by us from time to time including Tiller Technology Limited)
 - ♦ any personal information provided by way of correspondence with us by phone, e-mail during meetings or otherwise
- ♦ personal information we receive from third party sources, such as:
 - ♦ our clients: in connection with matters upon which we are or may be instructed (for example where you are a counterparty to a transaction)
 - ♦ entities in which you or someone connected to you has an interest
 - ♦ your legal and/or other advisors
 - ♦ financial institutions who hold and process your personal information
 - ♦ e-ID and verification service providers
 - ♦ credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements
 - ♦ 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.

Data collected through our website and social media

You may choose to provide personal data by completing any of the forms on our public websites (www.monocerosinnovation.com or www.monoceros.co.uk). These are included on the following pages:

- ♦ Contact Us

In addition to the information you knowingly provide, Monoceros may collect the domain names and IP addresses of its visitors, along with usage statistics, analytics and browsing history. This data is used to promote our services. Please see our cookies policy for more details about this. You may also provide us with personal information if you contact us by email, telephone, social media, or letter or provide us with a business card.



Data collected through social media

We may also collect information about you through social media such as your LinkedIn and Instagram details. This data is used to promote our services.

How we use your information

We are committed to protecting and respecting your privacy. We provide consultancy and governance services and in relation to ML only, legal services, to our clients and we use your personal data for those purposes. Normally the purposes for which we use your personal data will be clear when we collect that data.

We will not use your personal data for purposes that are not clear when we collect that data and will only use your personal information to:

- ♦ conduct administrative or operational processes within our business;
- ♦ provide and improve our services;
- ♦ compile anonymous statistics, for example website usage statistics;
- ♦ perform a contract which we may have with you;
- ♦ comply with our legal and regulatory obligations;
- ♦ to establish, exercise or defend the legal rights of Monoceros or for the purpose of legal proceedings;
- ♦ process and respond to requests, enquiries or complaints received from you or someone connected to you;
- ♦ send you marketing material (e.g. papers and links to podcasts and webinars);
- ♦ provide you with personalised content;
- ♦ invite you to events;
- ♦ for other legitimate business purposes; and
- ♦ to review and process your application should you apply for a position with us.

How and why we share your information

Within Monoceros

We share personal information within Monoceros for the purposes set out above.

Outside Monoceros

We also share personal information outside Monoceros. This may include disclosures to:

- ♦ third party agents, suppliers or contractors, in connection with the processing of your personal information for the purposes described in this Notice, which may include, but is not limited to:
 - ♦ IT, cybersecurity, website and communications service providers



- ♦ software developers
- ♦ E-ID and verification services providers
- ♦ our own advisers such as legal advisors, consultants, data protection officer/manager, compliance professionals, HR professionals, auditors and accountants which we may instruct from time to time
- ♦ third parties relevant to the services that we provide, which may include, but is not limited to:
 - ♦ counterparties to transactions
 - ♦ other professional service providers
 - ♦ regulators
 - ♦ law enforcement agencies
 - ♦ governmental institutions
 - ♦ tribunals and courts
- ♦ to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal information in order to comply with any legal obligation such as our AML/CFT obligations
- ♦ we may disclose your personal information for the purposes of seeking references and confirmation of the details which you have provided should you apply for a position with us.

International transfers

Where possible, we seek to ensure that all software services providers are situated within Jersey or the European Economic Area (the "**EEA**"). However where we transfer your personal information outside the EEA, 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 several different ways, for instance:

- ♦ The country to which we send the personal information may have been assessed by the European Commission ("**EC**") as providing an "adequate" level of protection for personal data (this includes Jersey)
- ♦ The recipient may have signed a contract based on standard contractual clauses approved by the EC.

In other circumstances, the law may permit us to transfer your personal information outside the EEA. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law. You can obtain more details of the protection given to



our personal information when it is transferred outside Europe by contacting us using the details set out below.

Direct marketing

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the relevant application form or page on our website where necessary. We may also contact you by email or other means to inform you about other services or events which may be of interest to you. You have the right at any time to stop us from contacting you for marketing purposes. If you wish to do so, please either unsubscribe or contact dpo@monoceros.co.uk

Retention of personal information and security

Your personal information will be retained for as long as required:

- ♦ for the purposes for which the personal information was collected
- ♦ in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations
- ♦ as required by data protection laws and any other applicable laws or regulatory requirements.

We will ensure that the personal information that we hold is subject to appropriate security measures.

Access to and control of your personal information

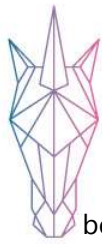
Rights of Data Subjects

You may have the following rights in respect of the personal information about you that Monoceros process pursuant to the DPJL including:

- ♦ the right to access and port personal information
- ♦ the right to have your personal information rectified or erased
- ♦ the right to restrict the use of personal information
- ♦ the right to object to the processing of or restrict the processing of personal information
- ♦ the right to withdraw your consent to the processing of your personal information.

Please note that the ability to rely on the rights set out above are subject to certain exemptions and conditions. We may decline to comply with any request to access, correct, delete or restrict the use of your information if there is a specific legal ground or exemption.

Where we are processing your information on the basis of contractual necessity or legal and regulatory requirement, it is likely that the provision and processing of such information will



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be mandatory. In addition, where the provision of your personal information is generally a contractual or legal requirement, or is a requirement in order for us to enter into a contract, in the event that you choose not to provide any personal information or to exercise one or more of the rights above to restrict the processing of your information, this may restrict the services which Monoceros is able to provide or we may have to decline to act on your behalf.

Should you wish to exercise any of your rights you should send your request to dpo@monoceros.co.uk. We will respond to your request in accordance with the DPJL.

We reserve the right to ask for proof of your identity and address (such as a copy of your driving license or passport - please do not send any original documents) and we also further reserve the right, in accordance with DPJL, to request for additional information reasonably required to identify the specific information being requested or referred to, or any additional information reasonably required to confirm your identity.

You can use the Data Subject Access Request form, available on our Cookie Banner or make email a request. If you have any questions about this process or any of your rights, contact our DPO at dpo@monoceros.co.uk. You can also make this request by phone or email.

We will respond to your request within four weeks after satisfactory verification of your identity. In some circumstances we can apply an eight-week extension to this time frame if the request is complex in nature, and it cannot be answered in the four-week time frame. If this is to happen, we will inform you as soon as practicably possible.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, contact our DPO at dpo@monoceros.co.uk.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

Complaints

You also have the right to lodge a complaint about the processing of your personal information either with us or with JOIC. JOIC's contact details are as follows:

Jersey Office of The Information Commissioner
2nd Floor, 5 Castle Street, St. Helier, Jersey JE2 3BT



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enquiries@jerseyoic.org

+44 (0) 1534 716530

<https://jerseyoic.org/>

Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.

If you wish to exercise any of the rights set out above, please contact our data protection officer at dpo@monoceros.co.uk.

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 our ability to provide services to you.

Questions and contact information

If you have any questions in relation to this notice please contact us at: info@monoceros.co.uk or dpo@monoceros.co.uk.

Changes to this Notice

We may change this Notice from time to time by updating this page. You should check this page from time to time to ensure you are happy with any changes.

Version 2.

We last updated this Notice on 2 August 2024.

Monoceros entities

- Monoceros Innovation Advisory Limited, a company incorporated in Jersey with registered number 133604, of L'ecurie, Les Marais, La Route du Marais, Jersey JE3 2GG, carrying on consultancy and innovation services.
- Emma German t/a Monoceros Law of L'ecurie, Les Marais, La Route du Marais, Jersey JE3 2GG, carrying on Jersey legal services. Founding Principal Emma German is regulated by the Law Society of Jersey for professional conduct matters and is supervised by the Jersey Financial Services Commission for the purposes of the prevention of money laundering and terrorist financing in respect of the services it provides that fall within Schedule 2 of the Proceeds of Crime (Jersey) Law 1999.