

# PRIVACY POLICY

Issue Date: 29th May 2025

Last Review Date: 25th June 2026

## 1. Our Commitment to You

Amber Fund Management Ltd (the "Company") is committed to protecting the confidentiality and privacy of your Personal Data through appropriate technical and organizational measures. This Policy explains how we process your Personal Data under the EU General Data Protection Regulation 2016/679 ("GDPR"). By accessing our website or contacting us, you agree that this Policy governs how we collect, store, use, share, and otherwise process your Personal Data, both during and after our relationship. This Policy supersedes any conflicting terms in existing Client Agreements. The Company is the Data Controller of your Personal Data and may update this Policy from time to time, with the latest version always available on our website.

Key definitions used throughout: Commissioner (FCA); Consent (freely given, informed agreement to processing); Controller/Processor/Third-party (as defined under GDPR); Personal Data (any information relating to an identified or identifiable person); Personal Data Breach (a security breach affecting Personal Data); Personal Data Processing (any operation performed on Personal Data).

## 2. Collection of Information

As part of client account opening and ongoing obligations, the Company complies with FCA's legislative framework, including AML Law 188(I)/2007 and related Directives, and GDPR record-keeping requirements under Law 87(I)/2017. The Company is obliged to collect and retain, for at least five (5) years, the following categories of Personal Data:

Category	Examples
Contact	name, address, phone, email
Documentary	ID/passport, proof of residence, source-of-funds documents, appropriateness assessment
Personal specific	gender, date of birth
Financial	assets, income, employment details
Socio-Demographic	education, profession, nationality
Contractual	details of services/products provided
Trading/Transactional	trading experience, risk profile, bank/e-wallet/card details
National identifier	Tax ID (TIN/TIC), country of tax residence
Location	IP address, phone-derived country
Communication	email, mail, and chat correspondence
Public Records	publicly available information
Consent/Permission	consents and preferences given to us
Behavioural	trading history, product preferences
Technical	device and technology details

Data may be collected directly from you or from credit agencies, fraud prevention agencies, banks, and public registers. We also collect website usage and trading behaviour data, and record communications (calls, chats, correspondence) as Company property and evidence of our relationship.

## 3. How Do We Use Your Personal Data

We process Personal Data only as required for regulatory compliance and to provide quality service, for the

following purposes:

- **Account Setup & Verification:** opening/administering your account, identity verification, support, payment processing.
- **Complaints:** handling concerns, complaints, and legal claims.
- **Personalisation:** with your consent, tailoring services to your background and trading experience.
- **Marketing:** sending marketing communications per your preferences (see Section 4).
- **Risk Management:** evaluating and managing business and trading risk.
- **Diagnostics, R&D:** improving our website and services.
- **Legal & Regulatory:** compliance, audits, responding to authorities, enforcing agreements.
- **Business Transfers:** sharing data in connection with a merger, acquisition, or sale of assets.
- **Other:** loss prevention and protecting our rights, safety, and property.

Data is processed for the specific purposes it was collected for ("purpose limitation"). Where we transfer Personal Data outside the EEA, we rely on European Commission adequacy decisions, Standard Contractual Clauses, or other GDPR Chapter V safeguards.

## 4. Personal Data - Marketing Opt-Out

We will not rent, swap, or sell your personal information to other organisations for their own marketing without your consent. We may market products, services, and promotions relevant to you if you have given consent. Any cross-border transfer of data for this purpose will follow an approved transfer mechanism.

To opt out of marketing communications at any time, email us at [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com)

- We need up to 72 hours to process changes to your marketing preferences.
- Even after opting out, we may still send important account-related information.

## 5. Contacting You, Disclosure & Consent

We may contact you by phone, fax, email, or post to administer our Agreement, and — with your agreement — for marketing or market research. We may disclose your Personal Data to: service providers/advisers (IT, financial, compliance); Partners or Tied Agents; regulatory authorities; anyone you authorise; fraud/AML investigators; trade repositories; and Company employees exercising their duties. All external recipients must contractually respect confidentiality and applicable data protection law.

The legal basis for processing is generally your consent, provided via the Client Agreement or account opening process. You may withdraw consent at any time by emailing [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com). Consent must be freely given, specific, informed, and unambiguous — it cannot be bundled into non-negotiable terms. We may also process data without consent where necessary: to comply with a legal obligation; to perform a contract; to protect vital interests; to perform a public-interest task; or for legitimate interests that do not override your rights.

## 6. Managing Your Data & Safeguard Measures

We apply appropriate technical and organisational security measures, restrict data access to employees/partners who need it, use secure computer storage and servers, and train staff on confidentiality — with disciplinary penalties for breaches. We have appointed a Data Protection Officer (DPO). Personal Data is retained for the duration of our business relationship and generally up to five (5) years afterward, or longer where legally required. Breaches will be reported to the Commissioner within 72 hours where required, and affected individuals notified without undue delay where there is high risk to their rights.

## 7. Change of Information

You may update or request deletion of your Personal Data at any time by emailing [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com)

We will act on your instructions except where retention is required for regulatory, legal, or service-provision purposes.

## 8. Your Rights Under GDPR

Subject to certain exemptions, and verified via two forms of ID, you have the right to:

- **Access:** request a copy of your Personal Data (within 1 month, extendable to 3 for complex requests).
- **Correction:** request correction of inaccurate data (within 1 month).
- **Withdraw consent:** where processing is based on consent (not where based on legitimate/legal interest).
- **Erase:** request deletion where there is no compelling reason to retain data.
- **Data portability:** obtain and transfer data you provided, where technically feasible.
- **Restrict processing:** request suspension of processing in certain circumstances.
- **Object:** object to processing based on legitimate interests.
- **Automated decisions:** request human involvement in decisions with legal/significant effect (we do not currently make such automated decisions).

To exercise any right, contact us at [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com)

## 9. Sharing Personal Data & Regulatory Disclosure

With your consent, we may share data with agents, advisers, counter-party banks, liquidity providers, marketing agencies, IT providers, business-transfer counterparties, payment-processing banks, regulators, law enforcement, and anyone you authorise. We do not sell or lease personal information. Transfers outside the EEA occur only with adequate safeguards and, where required, Commissioner authorisation. We may disclose data as required by law, court order, or regulatory request (including under FATCA, CRS, EMIR, and MiFIR reporting obligations), always on a need-to-know basis.

## 10. Data Retention (incl. Log Data & Cookies)

We retain Personal Data for at least five (5) years after the business relationship ends, and recorded communications for five (5) to ten (10) years depending on local requirements — whichever is longer among: the period needed for the service, any legally required period, the end of related litigation/investigation, or our legitimate interest.

### Log Data & Cookies

Our website ([www.amber-fund-management.com](http://www.amber-fund-management.com)) collects Log Data (IP address, browser type, referring page) and uses cookies — strictly necessary, analytical/performance, and functionality cookies — to operate and improve the site. We use Google Analytics, which may transmit data to Google servers in the US. Cookies used do not contain personally identifiable information. You may disable cookies via your browser settings, though this may limit site functionality.

## 11. Questions, DPO & Complaints

For questions, access/change requests, or complaints, email our Data Protection Officer at [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com)

Postal Address: 3 More London Riverside, London, England, SE1 2AQ. We will respond within thirty (30) days. You also have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection (United Kingdom) at [www.ico.org.uk](http://www.ico.org.uk), though we welcome the chance to resolve concerns directly first.

## 12. Update of this Policy

We may update this Policy from time to time. Material changes will be posted on [www.amber-fund-management.com](http://www.amber-fund-management.com). We encourage you to review this Policy periodically.

## 13. Website Use & Limitation of Liability

Website content is for information purposes only and does not constitute investment advice or a solicitation. The Company is not liable for losses arising from website use, technical unavailability, or third-party linked sites. The website is accessible via EU IP addresses; availability of financial products may be restricted by local law in certain jurisdictions.

## APPENDIX 1 - Amber Fund Management Mobile Applications

This appendix governs use of the Company's mobile applications ("Applications"). Registration is optional but required for full functionality. We collect user-provided data (name, email, username, transaction details, payment information) and automatically collected data (device type, device ID/IP, OS, browser, usage patterns). The Applications do not collect precise real-time location data.

Only aggregated, anonymised data is shared with external services to improve the Applications. We may otherwise disclose data as required by law, to protect rights/safety, or with trusted service providers bound by this Policy. You may opt out by uninstalling the Applications or emailing us. "User Provided Data" is retained while you use the Applications and for a reasonable period after; "Automatically Collected Information" is retained up to 24 months. We do not knowingly collect data from children under eighteen.

Questions about the Applications may be sent to [legal@amber-fund-management.com](mailto:legal@amber-fund-management.com)