



Version	1.02
Document Reference	CYJ-0094
Classification	Public
Effective Date	19/02/2025
Last Review Date	24/02/2026
Next Review Date	24/02/2027
Document Owner	Chief Compliance Officer
Document Approver	ISMF (Information Security Management Forum)
Document Summary	This policy details how we store, process and handle personal information in our website and blog

# Shareholders/Investors

CYJAX respects your privacy and is committed to protecting your personal data. When you invest in CYJAX we process your data, and we are the data controller. This means that we are responsible for deciding how we hold and use your personal data.

This notice explains how we obtain and manage your data.

## 1 Collection of personal data

In connection with your shareholding/investment, most of the information will be provided by you or someone on your behalf with your knowledge, such as a financial/investment agent. The information we will collect, use and store will usually include:

- Contact Information: Name, address, email address, phone number.
- Identity information: Copies of identity documents, shareholder information and any other information required to comply with legal or regulatory requirements.
- Communication data: Correspondence between you and our investor relations team, including emails, letters, and notes from meetings or calls.

## 2 How we use your personal data

We process your personal data for the following purposes:

- Investor Relationship Management: To communicate with you about your investments, provide you with updates on our company's performance.
- Compliance with Legal and Regulatory Obligations: To meet our obligations under securities laws, tax laws, and anti-money laundering (AML) regulations.
- Processing Transactions: To process investment transactions, payments, and to fulfill any related administrative tasks.
- Communication and Notifications: To send you reports, communications, notices of meetings, and other important corporate updates.
- Recordkeeping and Reporting: To maintain accurate records of your investments and ensure compliance with legal, financial, and regulatory requirements.

## 3 Lawful basis and purpose of processing personal data

- Contractual Necessity: The processing is necessary for the performance of an investment agreement or to take steps prior to entering into such an agreement.
- Legal Obligations: We process your personal data to comply with applicable laws and regulatory requirements (e.g., anti-money laundering, securities regulations).
- Legitimate Interests: We process your data based on our legitimate interests in managing investor relations and ensuring our compliance with financial and regulatory obligations.
- Consent: In certain circumstances, we may seek your explicit consent to process specific types of personal data (such as for marketing communications or sharing your data with third parties for specific purposes).

## 4 Retention

We retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal, financial, and regulatory obligations. After this period, we will securely delete or anonymise your data. Specific retention periods may apply, depending on the nature of the data and applicable regulations.

## 5 Security

CYJAX is dedicated to ensuring that all information is protected against unauthorised access, processed appropriately, and held securely in accordance with the UK and EU General Data Protection Regulation (GDPR) and Data Protection Act 2018.

Our ISMS (information security management system) is certified to ISO/IEC 27001, demonstrating that we have the appropriate Framework in place to ensure that all our information assets and networks are secure.

All data is encrypted both in transit, end-to-end and at rest using AES-256.

## 6 Storage

We primarily store your personal data in the United Kingdom. However, there may be occasions when we need to transfer your personal data to countries outside of the United Kingdom, including those outside of the European Economic Area (EEA). These transfers may occur when, for example, we engage with third-party service providers or partners located outside the UK.

When your personal data is transferred abroad, we ensure that appropriate safeguards are in place to protect your data, in accordance with applicable data protection laws, including the use of standard contractual clauses, where necessary.

## 7 Sharing

We will only share your data internally and with third parties for the purposes of managing your shareholding and/or investment. The third parties may include your financial/investment agent.

CYJAX or its service providers share your personal data with third parties when:

- required by law.
- requested by a regulator.
- necessary to manage your investment, including operational, administrative, and financial processes.
- where required by applicable law, regulation or regulatory authority
- necessary for fraud and data error investigations.

The third parties include the following service providers:

Third party	Purpose
Adobe	Contract e-signing
M365	Document storage and email

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 8 Your rights in relation to personal data

Under data protection laws in the European Union and the UK, you have certain rights in relation to your personal information. You have the right:

- to be informed about the collection and the use of your personal data.
- to access personal data and supplementary information.

- to have inaccurate personal data rectified or completed if it is incomplete.
- to erasure (to be forgotten) in certain circumstances.
- to restrict processing in certain circumstances.
- to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services.
- to cease/object to processing in certain circumstances.
- rights in relation to automated decision making and profiling.
- to complain to the Information Commissioner.
- Withdraw your consent at any time.

A full list of your rights under the UK General Data Protection Regulation (GDPR) is available on the Information Commissioner's Office (ICO) website.

We will handle all requests in accordance with applicable law. However, depending on the right you wish to exercise, and the nature of the personal information involved, there may be legal reasons why we cannot grant your request. If this is the case, we will write to you to explain the reasons why.

## 9 Accessing, rectifying, restricting, objecting or erasure of your personal information.

To exercise your right to access, rectify, restrict, object to processing of, or erase the personal information CYJAX holds about you, please contact our Data Privacy Manager at [privacy\[at\]cyjax.com](mailto:privacy[at]cyjax.com) or, if you are based in the EU or our EU Representative (details below).

Requests will be acknowledged within three working days, with the final response and disclosure of information (subject to exemptions) within 30 calendar days.

A 'cease processing request' from an individual will be acknowledged immediately with an automatic email response stating that CYJAX intends to comply with the request.

For information on the Privacy and Electronic Communications (EC Directive) Regulations 2003, UK General Data Protection Regulation (GDPR), Data Protection Act 2018 and the Information Commissioner's Office, please follow this link: <https://ico.org.uk/>.

CYJAX is registered with the United Kingdom Information Commissioner's Office (ICO) under reference ZA053004, as required by UK (United Kingdom) legislation.

### 9.1 EU (European Union) Representative

As we do not have an establishment in the European Union ("EU"), we have appointed a representative based in Ireland, who you may contact if you are located in the EU to raise any issues or queries you may have relating to our processing of your Personal Data and/or this Privacy Notice. Our EU representative is Data Protection Limited, located at 2 Pembroke House, 28-32 Upper Pembroke Street, Dublin, Ireland D02 EK84. Our EU representative can be contacted directly on 00 353 1 447 0402 or at [cyjax@willansdps.com](mailto:cyjax@willansdps.com).

## 10 How to raise a Complaint

If you have concerns about how we collect or use your personal data, we encourage you to contact us first. We are committed to resolving privacy complaints quickly and fairly.

### Step 1: Contact Us

Email: [privacy\[at\]cyjax.com](mailto:privacy[at]cyjax.com)

Post: Data Protection Officer, First Floor, 1 Des Roches Square, Witan Way, Witney, OXON OX28 4BE

Please include: Your full name and contact information, a summary of your concern and any relevant dates or evidence.

**Step 2: Our Response**

We will acknowledge your complaint within 30 days. You will receive a full response as soon as possible (typically within 45 days).

**Step 3: If You're Not Satisfied**

If you are not happy with our response, you may escalate the matter to the Information Commission (ICO): <https://ico.org.uk/make-a-complaint/>

## 11 Document History

Revision Version	Revision Date	Description of Revision	Revision Author(s)
1.01	18/9/2025	Added in details on how to raise a complaint	Louise Cook
1.00	19/02/2025	Split out from Main Privacy notice to publish separately on the website	Louise Cook