

WEBSITE PRIVACY, COOKIE AND DATA USE POLICY

Welcome to AX1 Ltd's Privacy and Data Use Policy. The purpose of this policy is to explain how we collect personal information about you and how we can use your information.

Protection of your personal data is of great importance to us. We therefore, as a matter of routine, handle your personal data responsibly and in compliance with the applicable statutory data protection act.

This Privacy Policy contains information for you about our data processing methods. We explain what data will be processed by us whenever you access this website

PRIVACY NOTICE

Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how AX1 Ltd collects and processes your personal data through your use of this website, including any data you may provide through this website when you register for an account with us.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

AX1 Ltd is the controller and is responsible for your personal data (collectively referred to as "AX1", "we", "us" or "our" in this privacy notice).

Details of the registration of the General Partner as data controller can be found on the website of the Jersey Information Commissioner: www.dataci.je.

Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to

collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

DATA PROTECTION

Information relating to prospective AX1 Tokenholder(s) (and, where applicable, any underlying investor(s)) will be transferred to and/or requested by the Issuer and/or the Administrator. The Issuer will act as a "data controller" and will hold any Personal Data in accordance with the Data Protection (Jersey) Law 2005 of Jersey and any applicable secondary legislation or any other legislation in force in Jersey from time to time concerning data protection.

Any Personal Data will be held by the Issuer and may be processed for the following purposes:

to undertake and administer the Issuer's operations and business, including maintaining the register of members and mailing lists, verifying the identity of the Issuer in connection with any actual or proposed investments or for any other purpose which the Directors and/or the Administrator consider is in the legitimate business interest of the Issuer;

- to carry out statistical analysis or market research;
- to comply with the listing, legal, regulatory, reporting and/or financial obligations of the Issuer or legal or regulatory obligations of any service provider or functionary (or his/her employer) of the Issuer;
- for archiving and record keeping purposes;
- to contact the AX1 Tokenholder(s) with information about other products and services provided by the Issuer and/or any of their affiliates, which may be of interest to the prospective investor; and
- for any other specific purpose to which the prospective investors have given consent or for any purpose reasonably ancillary to the foregoing.

Personal Data may be disclosed to:

- affiliates or group companies of the Issuer and any professionals, advisors or agents appointed by the Issuer;
- any service providers appointed by the Issuer (including but not limited to the Administrator) and its or their affiliates or group companies, agents

or professional advisors, and functionaries of the Issuer (including their employer);

- regulatory or governmental authorities if required pursuant to applicable law or regulatory requirements.

This may include sharing Personal Data with third parties in one or more of the countries mentioned below (and these countries may have different (and possibly lower) standards of data protection legislation). Any transfer of Personal Data shall be in accordance with the Jersey Data Protection Legislation, which includes the requirement to take appropriate technical and organisational measures to prevent the unauthorised or unlawful processing of personal data and safeguard against accidental loss or destruction of or damage to personal data.

The countries referred to above include, but need not be limited to, those in the European Economic Area or the European Union and any of their respective dependent territories overseas, Argentina, Australia, Brazil, Canada, Hong Kong, Hungary, Japan, New Zealand, Singapore, South Africa, Switzerland, the British Virgin Islands, the Cayman Islands and the United States of America.

Personal Data must be retained on record for a period of up to 10 years after it is no longer used in order to comply with regulatory requirements. Thereafter, personal data shall be deleted unless there is a specific ongoing reason for its retention (which may include but shall not be limited to meeting legal or regulatory obligations).

Details of the registration of the General Partner as data controller can be found on the website of the Jersey Information Commissioner: www.dataci.je.

Your legal rights

You have the right to make a written request for a copy of the personal data we hold about you. To make a request, please support@ax1.io. We aim to respond to your request as soon as possible and in any event within one month after we receive your request. Please note, we may require further information from you before we can respond in order to verify your identity.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend

legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

No fee usually required

you will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response

COOKIE POLICY

Information about our use of cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

I.P ADDRESS

Our website logs your Internet Protocol (I.P) address. All computers that are linked to the Internet have an I.P number. An I.P address does not provide identifiable personal information.

LINKS

Our website provides links to other websites. Our Privacy, Cookie and Data Use Policy applies only to this site and we are not responsible for the privacy and/or data capture and use practices of third party sites.

Changes to the Privacy Policy

Changes to this Privacy Policy may be required from time to time, for example due to the ongoing development of our digital presence or as a result of changes in legislation. AX1 Ltd therefore reserves the right to change the Privacy Policy at any time, with effect from a future date. Accordingly, we recommend that you re-read this Privacy Policy on a regular basis.