

Privacy Policy

(Treatment of Personal Information)

Alphadyne Asset Management Holdings Limited (“Alphadyne Japan”) shall manage handling, etc. of personal information, individual number, and specific personal information (individual number and specific personal information collectively referred to as the “Specific Personal Information, Etc.”) in accordance with the Act on the Protection of Personal Information (the “APPI”), Act on the Use of Numbers to Identify a Specific Individual in Administrative Procedures (the “Individual Numbers Act”) and other laws and regulations, the rules of the Accredited Personal Information Protection Organization that it is a member of, and internal rules, etc., and shall take adequate measures for safety control of such information.

1. Definitions

Except as defined in the following paragraphs, terms defined in the APPI or the Individual Numbers Act shall have the same meanings in this Privacy Policy.

- (1) “Clients” shall refer to individual clients and individuals who belong to a client corporation, individuals who are prospective clients and individuals who belong to a corporation which is a prospective client, and individuals who belong to transaction counterparties and issuers, etc.
- (2) “Employees” refers to employees of Alphadyne Japan.
- (3) “Data Subjects” refers to Clients and Employees.
- (4) “Personal Information” shall refer to information pertaining to living individuals that enables identification of a specific person through name, date of birth and other statement included in such information (including those that can be easily reconciled with other information which results in identification of such individual).
- (5) “Personal Information Database” refers to an assembly of information including Personal Information systematically arranged in such a way that specific Personal Information can be retrieved by a computer; or even without the use of a computer, an assembly of information including Personal Information systematically arranged in such a way that specific Personal Information can be easily retrieved such as by applying certain rules including with alphabetically indexed and ordered client cards, that are maintained to enable generally easy retrieving with table of contents, index, codes, etc.
- (6) “Personal Data” refers to Personal Information constituting a Personal Information Database.
- (7) “Individual Number” refers to the number obtained by converting the resident

record code and designated for identification of the person for whom such resident record code is stated on the resident record, and which is specified in the Individual Numbers Act, Article 7, Paragraph 1 and 2.

- (8) “Specific Personal Information” refers to Personal Information that includes Individual Numbers (including numbers, signs and other symbols corresponding to and used in lieu of the Individual Number other than the resident record code).
- (9) “Retained Personal Data” refers to Personal Data that Alphadyne Japan has the authority to disclose, correct, add or delete the contents of, cease the utilization of, erase, and cease the third-party provision of, and which shall not harm the public or other interests if their presence or absence is made known.
- (10) “Alphadyne” refers to Alphadyne Asset Management LP, Alphadyne Asset Management (UK) LLP, Alphadyne Asset Management (Hong Kong) Limited, Alphadyne (Singapore) Pte. Ltd and Alphadyne Japan.

2. Method of Acquisition and Type of Personal Information

- (1) Alphadyne Japan shall acquire minimum Personal Information (excluding Specific Personal Information, Etc. The same shall apply hereinafter in this Section 2.) necessary for the business by proper means.
- (2) Types of Personal Information of Clients to be acquired includes the following items:
 - (a) Name
 - (b) Address, telephone number, facsimile number, e-mail address
 - (c) Name, address, telephone number, facsimile number, e-mail address of the employer
 - (d) Title held at the employer
- (3) Types of Personal Information regarding Employees to be acquired are set forth in the Japan Employee Data Protection Policy.

3. Purpose of Use of Personal Information

- (1) Alphadyne Japan shall use the Personal Information (excluding Specific Personal Information, Etc. The same shall apply hereinafter in this Section 3) for business, etc. conducted by Alphadyne Japan.
- (2) Alphadyne Japan shall not use Personal Information in a manner that is likely to encourage or induce illegal or unjust acts.
- (3) Alphadyne Japan shall specify the purpose of use each time written Personal Information is to be acquired directly from a Data Subject in advance.
- (4) Alphadyne Japan shall use Personal Information of Clients for the following purposes only:

- (a) Solicitation/proposal concerning the business, etc. conducted by Alphadyne Japan or notice of services
 - (b) To determine appropriateness of provision of investment products and services in light of principle of suitability, etc.
 - (c) Confirmation of the Client or his/her representative's identity
 - (d) Provision of investment advisory service
 - (e) Reporting of investment results and asset balance, etc. to the Client
 - (f) Administration of transaction with the Client
 - (g) To study and develop investment products, financial products or services by conducting market research, data analysis, and surveys, etc.
 - (h) Otherwise for appropriate and smooth performance of transactions with Clients
- (5) Alphadyne Japan shall use Personal Information of Employees for the purposes set forth in the Japan Employee Data Protection Policy. To the extent the terms of this Privacy Policy conflict with the Japan Employee Data Protection Policy, the terms of the Japan Employee Data Protection Policy shall govern Personal Information of Employees.
- (6) Alphadyne Japan shall use Personal Information to the extent necessary for performance of its business within the scope of purpose of use and shall not use the same for other purposes.
- (7) The purpose of use shall be made publicly available by measures including posting of this Privacy Policy on the home page of Alphadyne Japan.

4. Provision of Personal Information to Third Parties

- (1) Alphadyne Japan will not provide Personal Information (excluding Specific Personal Information, Etc. The same shall apply hereinafter in this Section 4) of the Data Subject to a third party without the consent of the Data Subject; provided, however, that necessary scope of Personal Information of a Data Subject may be provided to a third party as an exception in the following cases:
- (a) In case it is based on the laws
 - (b) In case the business is outsourced in accordance with the purpose of use
 - (c) In case of re-entrustment of investment
 - (d) In case Personal Information is deposited with a third party to outsource the business of handling Personal Data
- (In the case of (b), (c), or (d) above, necessary measures under the law will be taken, including investigation of such subcontractor/third party and execution of necessary contracts.)
- (2) In the case that Alphadyne Japan provides Personal Information to a third party

located in a foreign country with the consent of the Data Subject, and when Alphadyne Japan is unable to identify the foreign country in which the third party to which the Personal Information is provided is located at the time of obtaining the Data Subject's consent, (a) Alphadyne Japan shall, upon the Data Subject's request, provide the Data Subject with information regarding the name of the foreign country, etc. in accordance with the APPI if it becomes possible to identify such foreign country after such consent, and (b) Alphadyne Japan shall, upon the Data Subject's request, provide the Data Subject with information on measures taken by the third party to protect Personal Information if it becomes possible to provide information on such measures after such consent. In addition, when Alphadyne Japan provides Personal Information to a foreign country without the consent of the Data Subject, Alphadyne Japan shall, in accordance with the APPI, provide the Data Subject with information on measures necessary to ensure the third party's continuous implementation of measures equivalent to those required to be taken by businesses handling Personal Information, upon the Data Subject's request.

5. Joint Use of Personal Information.

Alphadyne Japan may jointly use all or part of Personal Information of Data Subjects acquired by Alphadyne Japan as stated below.

- (1) Items of the jointly used Personal Information
Personal Information described in Section 2, Paragraph 3
- (2) Scope of entity jointly using such Personal Information
Alphadyne Asset Management LP (U.S.A.)
Alphadyne Asset Management (UK) LLP (UK)
Alphadyne Asset Management (Hong Kong) Limited (China)
Alphadyne (Singapore) Pte. Ltd. (Singapore)
- (3) Purpose of use for the entity jointly using such Personal Information
Purpose described in Section 3, Paragraph 5
- (4) Entity responsible for management of such Personal Information jointly used
Alphadyne Japan

6. Purpose of Use of Specific Personal Information, Etc.

- (1) Alphadyne Japan shall acquire and use Specific Personal Information, Etc. within the scope prescribed in the Individual Numbers Act.
- (2) Alphadyne Japan shall not use Specific Personal Information, Etc. in a manner that is likely to encourage or induce illegal or unjust acts.
- (3) Alphadyne Japan shall specify the purpose of use each time written Specific Personal Information, Etc. is to be acquired directly from a Data Subject in advance.

(4) Alphadyne Japan shall use Specific Personal Information, Etc. to the extent necessary for performance of business within the scope of purpose of use and shall not use the same for other purposes.

7. Provision of Specific Personal Information, Etc. to Third Parties

Alphadyne Japan shall not provide Specific Personal Information, Etc. of the Data Subject to a third party other than in cases permitted under the Individual Numbers Act, regardless of the Data Subject's consent or approval.

8. Method for Management of Personal Data and Specific Personal Information, Etc.

(1) Appropriate measures will be taken to ensure that the Data Subject's Personal Data and Specific Personal Information, Etc. are accurate and latest information.

(2) Appropriate information security measures will be taken to prevent loss, destruction, alteration, and leaks, etc. of the Data Subject's Personal Data and Specific Personal Information, Etc. For more information on the safety control measures implemented by Alphadyne Japan, please contact the contact office set forth in Section 11.

9. Request for Notice of Purpose of Use, Disclosure, Revision/Addition/Deletion, Suspension of Use, Erasure, and Suspension of Provision to Third Parties of Retained Personal Data and Disclosure of Third Party Provision Records from the Data Subject (collectively referred to as "Disclosure")

(1) Notice of Purpose of Use, Disclosure, and Revision/Addition/Deletion of Retained Personal Data and Disclosure of Third Party Provision Records

(a) In case the Data Subject requests notice of purpose of use or disclosure of information concerning the Data Subject or disclosure of third party provision records, response to such requests will be given unless there are specific reasons not to, subject to confirmation that the requester is the Data Subject or the Data Subject's representative.

(b) In case the information concerning the Data Subject is inaccurate, it will be replaced with accurate information.

(2) Suspension of Use, Erasure, and Suspension of Provision to Third Parties of Retained Personal Data

In case the Data Subject requests suspension of use, erasure, or suspension of provision to third parties of information concerning such Data Subject, measures to suspend use, erase, suspend provision to third parties, etc. will be taken unless there is specific reason not to.

10. Procedure for Request on Retained Personal Data Disclosure from Data Subject

(1) Items Subject to Request for Disclosure

Items of “Retained Personal Data” subject to Disclosure include the items set forth in Section 2, Paragraph 2 and Section 2, Paragraph 3:

(2) Application for Disclosure

Please make application for Disclosure by post addressed to the contact stated in Section 11, Paragraph 1, using the designated application form with attachment of personal identification documents, etc. Please state “Disclosure Request Documents” on the envelope.

(3) Documents to be Submitted for Requesting Disclosure

(a) Request by the Data Subject: Please send designated application form and personal identification documents.

(b) Request by the Data Subject’s representative: In addition to the designated application form and personal identification documents, please submit the designated power of attorney, etc., and personal identification documents of the representative as specified below.

(i) Request by Legal Representative

a. Document stating the legal representative rights (any format)

b. Document for confirming the legal representative right (certificate of registered information of the adult guardian system; provided, however, that a copy of transcript/extract of family register or resident certificate showing both the Data Subject and the legal representative and their relationship may suffice if the legal representative is a person with parental authority)

c. Personal identification document for the legal representative

(ii) In case of representative through power of attorney

a. Designated power of attorney (please affix the seal that is affixed on the Certificate of Seal Impression of the Data Subject)

b. Certificate of Seal Impression of the Data Subject

c. Personal identification document of the representative

(c) Please contact the address stated in Section 11, Paragraph 1 to request for application form and power of attorney, etc.

(4) Method for Requesting Disclosure

By postal mail.

(5) Method for Confirmation of the Person or Representative of the Requester of Disclosure

Please send the original or copy of formal documents such as driver’s license,

various insurance certificates, passport, certificate of alien registration.

(6) Fee for Disclosure

Disclosure shall be made free of charge; provided, however, that any expense incurred by the Data Subject for sending the application form and personal identification documents, etc. to Alphadyne Japan shall be borne by the Data Subject.

(7) Items Required for Identification of Retained Personal Data or Third Party Provision Records

Alphadyne Japan may request the Data Subject to present items required for identification of Retained Personal Data or third party provision records with respect to the request for Disclosure. Items required for identification of Retained Personal Data or third party provision records are the name, address, and telephone number of the Data Subject, and the name, address, and telephone number of the employer.

(8) Method of Reply

In principle, reply will be provided in writing by postal mail addressed to the address stated on the application form; provided, however, that the disclosure shall be made by means that the Data Subject requests (or by paper-based document, in cases where disclosing the information by such means would require a costly expenditure or otherwise be difficult). Please note that the reply may take time depending on the information requested for Disclosure.

(9) Purpose of Use of Retained Personal Data Acquired in Conjunction with Request for Disclosure

Retained Personal Data acquired by Alphadyne Japan in conjunction with the request for Disclosure shall be used only within the scope necessary for request for Disclosure.

*Reason for Refusal to Disclose Retained Personal Data and Third Party Provision Records
In case any of the following reasons apply, disclosure will be refused. In case a decision is made to refuse disclosure, such fact and reason will be notified.

- In case personal identification cannot be made, such as mismatching of address stated on the application, personal identification documents, and Alphadyne Japan's Retained Personal Data.
- In case the right of representation cannot be confirmed for application by the representative
- In case there is a defect in designated application form
- In case the request for disclosure is not for "Retained Personal Data"
- In case the disclosure is likely to harm the life, body, property, or other rights or

interests of the Data Subject or a third party

- In case the disclosure is likely to seriously impede the proper execution of the business of Alphadyne Japan
- In case the disclosure violates other laws

11. Contact for Inquiries and Complaints from Data Subject

(1) Contact for Inquiries and Complaints Concerning Personal Information and Specific Personal Information, Etc.

Inquiries and complaints, etc. concerning handling of Personal Information and Specific Personal Information, Etc. from Data Subjects shall be handled appropriately by the following contacts, etc. Please contact via telephone or in writing.

Alphadyne Asset Management Holdings Limited

Otemachi Park Building, 1-1-1 Otemachi, Chiyoda-ku, Tokyo, 100-0004

Representative in Japan Tatsuya Takeda

Compliance Officer (03) 4588-3100

(Business Hours: 9:00 to 17:00 excluding the weekend, public holidays and non-business days around year-end and New Year)

(2) Name of the Accredited Personal Information Protection Organization that it is a Member of, and Customer Complaints/Consultation Contact Information

(a) Japan Investment Advisers Association (03)3663-0505

(b) Type II Financial Instruments Firms Association (03)6910-3980

12. Revisions

The contents of this Privacy Policy shall be reviewed as necessary for revision of laws and other reasons, and Alphadyne Japan will endeavor to make ongoing improvements.

Supplementary Provisions

These Rules shall become effective on February 1, 2024.