

# Privacy policy

## APF AGRICULTURAL INVESTMENT LTD

15. 10. 2026 · Working website version

### 1. Data controller

The controller for this website, enquiries and LTD contractual matters is APF AGRICULTURAL INVESTMENT LTD, company number 13810721, Office Q, 35 Astbury Road, London, England, SE15 2NL, United Kingdom. Privacy contact: [info@verdanteurope.com](mailto:info@verdanteurope.com). Czech contact address: Kostelecká 366, 796 01 Prostějov. These policies do not govern separate processing by APF GROUP EUROPE SICAV P.L.C. or other companies.

### 2. Applicable framework

We process data under the UK GDPR and the Data Protection Act 2018, as amended. Regulation (EU) 2016/679 (EU GDPR) also applies to the relevant extent when processing relates to offering goods or services to people in the EU. The Czech contact address is not itself a notification of appointment of an Article 27 representative. If appointment is required for the specific operations, the representative's details will be published before the relevant processing begins.

### 3. Contact and order form

We process your name, email, topic and message. Phone and company details are optional. VERDT purchase requests also include the small, medium or large programme, amount and currency, preferred term, country of residence or registered office, and privacy, AML and risk acknowledgements. We use these details to handle the request, prepare an offer and agreement and communicate with you. Requested pre-contractual steps rely on Article 6(1)(b) GDPR. General enquiries and communication with company contact persons rely on our legitimate interest in effective communication under Article 6(1)(f). Once email sending is connected, [info@verdanteurope.com](mailto:info@verdanteurope.com) receives the request and the applicant receives an acknowledgement. That acknowledgement does not conclude a purchase agreement.

### 4. Contracts and AML

To conclude and perform agreements, we process necessary identity, contact, contractual, payment and transaction data and, where relevant, a wallet address and related blockchain records. The bases are contract performance under Article 6(1)(b), statutory accounting, tax and other obligations under Article 6(1)(c), and protection of legal rights under Article 6(1)(f). Where applicable AML or sanctions law requires identity, beneficial ownership, source-of-funds or political exposure checks, the relevant obliged entity processes the necessary information. Ticking the AML box does not replace statutory checks. Do not send identity documents or source-of-funds evidence through this form. Request an approved secure submission method.

## **5. Sources and provision of data**

Data is mainly supplied directly by you, an authorised representative or a contractual partner. Verification may involve public registers, relevant sanctions lists and public blockchain records. Where information is obtained indirectly, we provide the applicable Article 14 information unless a statutory exception applies. Enquiry data is provided voluntarily. We cannot reply without necessary contact information. A relationship may not proceed without data required for the agreement or statutory checks.

## **6. Retention**

If no further cooperation follows, enquiry or interest-registration data is retained for no more than one year after the last communication. Longer retention may be necessary for a specific legal claim or statutory duty. Contracts are kept throughout the relationship and for applicable statutory accounting, tax and limitation periods thereafter. AML evidence is retained for the period required by law applicable to the specific obliged entity, not automatically under another company's regime. Data is then deleted or anonymised where its nature and our duties permit. Public blockchain records are not under LTD's exclusive control and may not be technically erasable.

## **7. Recipients and security**

Data is made available only to authorised persons and necessary providers, including hosting and IT support, email, accounting and legal services. The working website uses ChatGPT Sites and Cloudflare infrastructure. Resend is prepared for form email delivery. Requests are not sent through it until it is connected. Mailbox providers process delivered messages. Data is not automatically shared with group companies. Any sharing needs a specific purpose and legal basis. Appropriate contractual and security arrangements apply to processors. The application has no order database and does not write form contents to application logs.

## **8. International transfers**

LTD is based in the United Kingdom, so we cannot state that all data remains solely in the EU. Transfers from the EEA to the UK may rely on the valid European Commission adequacy decision within its scope. Any onward transfer to providers in other countries requires an appropriate legal mechanism, such as a valid adequacy decision or standard contractual clauses and any supplementary measures. Restricted transfers under UK GDPR require an applicable UK mechanism. The email service's specific arrangements must be checked before activation. Details of recipients, countries and safeguards may be requested at [info@verdanteurope.com](mailto:info@verdanteurope.com).

## **9. Newsletters and acknowledgements**

Submitting a form or acknowledging privacy information is not consent to marketing. The working website has no active newsletter subscription. Any marketing will require separate consent or another applicable statutory customer-communication condition. Each message will offer a simple free opt-out. Consent may be withdrawn without affecting the lawfulness of earlier processing.

## **10. Cookies, storage and automation**

The application stores only the language preference in localStorage under verdant-language. It can be removed under Cookies and settings or in your browser. There are no site-level advertising or analytics scripts. Hosting and sign-in to the working preview may require technical cookies or operational data. External websites have their own policies. The embedded PDF preview loads its file from this website. This website does not conduct automated decision-making with legal or similarly significant effects or marketing profiling.

## **11. Your rights and complaints**

Subject to applicable law, you may request access, a copy, correction, erasure, restriction and portability. You may object to processing based on legitimate interests and object to direct marketing at any time. Contact [info@verdanteurope.com](mailto:info@verdanteurope.com). We respond without undue delay within the applicable statutory period, normally one month. Any extension is explained. Identity is verified proportionately. Statutory duties or legal claims may limit erasure. You may complain to the Information Commissioner's Office ([ico.org.uk](https://ico.org.uk)), the Czech Office for Personal Data Protection ([uouu.gov.cz](https://uouu.gov.cz)), or another competent authority according to your residence, workplace or the alleged infringement.

## **12. Version and earlier documentation**

Working LTD website version dated 15 October 2026. For LTD matters, it replaces the earlier general policies labelled APF GROUP EUROPE SICAV P.L.C. Earlier files remain in the archive and are not presented as current LTD policies. Changes in purposes, providers or operations will be reflected in updates, with any further mandatory information supplied before new processing begins.

# Privacy supplement for customer verification

Status at 16 October 2026

LTD is preparing VERDT small identity verification through an external provider. Sumsb has been contacted. The service agreement and specific processing scope have not been confirmed. Real identity documents and biometric data are not collected by the current test checkout.

Before activation, information must identify the contracted provider, controller and processor roles, purposes and legal bases including any biometric data, specific retention periods, recipients and subprocessors, processing locations and international transfer mechanisms. The need for a data-protection impact assessment will be evaluated before introducing the process.

Filing a complaint, withdrawal or refund request does not require marketing consent. Notice data is used to handle the request and protect legal rights. For an order-linked notice, the type, message, order identifier and receipt time are recorded. Demo mode is explicitly a simulation.

Inconclusive verification will have an individual resolution and review route through a responsible person. KYC is distinct from email verification. Do not submit identity documents, selfies, seed phrases or private keys through ordinary email or the contact form.

Contact for enquiries and rights: [info@verdanteurope.com](mailto:info@verdanteurope.com). LTD has separate responsibilities. The fund manages its own KYC/AML and data protection. Earlier information must be read consistently with this current preparation status.