



AJC GROUP, LLC DATA PROCESSING STATEMENT & GDPR PRIVACY POLICY MAY 25, 2018

This Data Processing Statement & GDPR Privacy Policy has been created by AJC Group, LLC to govern all of our subsidiaries, branches and affiliates. We will define the documents we utilize in the various aspects of our business with you and your company; how we will handle the processing of personal, corporate and sensitive data in order to meet compliance and legal obligations; and the measures we use to manage risks and provide a high level of protection of your data along with legal liabilities for which we must abide and legally cooperate.

Documents Utilized in the AJC Group Customer and Vendor Process

The data we collect directly from you or from a third party regarding you and/or your company (“Your Data”) is for the purpose of establishing the appropriate credit terms, limits and/or payment terms for our mutual ongoing business transactions as well as for abiding by applicable legal and business requirements. In other words processing Your Data is necessary for the performance of a contract which you and/or your company is party or in order to take steps prior to entering into a contract. Your Data can contain any of the below items as well as those received from time to time as our business relationship continues to grow.

1. Completed AJC Credit Profile/Application/New Vendor Form
2. Email exchanges between us showing names, contact information and locations
3. Personal and Corporate data obtained from banks, trade references, agents, social media, pictures obtained during trips, trip reports from our visits by people employed by us to your facilities or a visit by any of your employees to any of our locations, third party reports from credit reference agencies/insurance agencies, brokers and underwriters/surveyors/various compliance protection agencies/various government agencies/various bank and professional auditors/steamship companies/freight forwarders/NVOCC operators/ or other third party sources utilized in our credit investigation process used in the ordinary course of managing your transactions with our company
4. Where appropriate your file may also contain Cross guarantees, Personal Guarantees, Offset Agreements, account statements, invoices, contract details to include sales agreements, necessary licenses such as OFAC, Import licenses etc., account tracking spreadsheets, credit card numbers, copies of driver’s license or passport or other normal course of business documentation necessary to manage your account
5. Corporate documents sent by you to us including but not limited to: legal organization documents, financials statements, product skews and requirements, inventory documents etc.

AJC also collects data via its website(digital contact form). This data is processed by us for the purpose of responding to your message.



How We Handle the Processing of Your Data

AJC has, to its best knowledge, implemented appropriate technical and organizational measures to protect Your Data. Your Data may be shared with third parties including but not limited to banks, reference agencies, trade references and insurance companies. AJC requires the same kind of measures of such third parties regarding the processing of Your Data. It may also be shared between AJC offices and personnel as related to the establishment of your Credit with our company. We will make best efforts in providing only those parts of Your Data which are reasonably necessary to third parties.

How We Protect Your Data

We have taken many precautions to protect Your Data which include but are not limited to the following.

1. Your Credit file data is stored and will be forever retained in a secure internal data base
2. AJC does not sell or provide a composite customer list to any outside organizations
3. We have implemented appropriate technical security measures to protect Your Data through firewalls and various virus protection programs
4. We have trained our worldwide employees on Cyberfraud techniques and prevention
5. We do not use platforms for corporate communication such as Yahoo or Gmail due to the lack of security on those systems
6. We will send you an encrypted message advising bank routing details for making payments to us. In the case of any change we will once again only contact you with new data via an encrypted message. If you receive a request to send funds to a bank account to which you have not historically been sending our funds it is necessary for you to call your AJC Credit Contact person and confirm where funds should be sent and that such a change is correct. In the case we owe you funds we will call and confirm your banking information so that messages cannot be intercepted and funds forwarded to an incorrect bank account
7. In the unlikely event of a data breach we have a process to report such a breach involving Your Data to you and the authorities within a reasonable timeframe.
8. We will not store Your Data for a longer period than necessary for the purposes mentioned to collect Your Data, unless required by law.

You are responsible to protect and ensure that the data you send to us is sent on a secure platform. If there is an interception of data on your email account which causes fraudulent communications where there may be a loss of funds due to sending payments to an incorrect account it will be your responsibility and loss.

Legal Obligations To Which AJC Must Abide

AJC cannot be held liable by you for any wrong doings or privacy breaches if we are required by law to provide any documents pertaining to you and your business by US or foreign law organizations including but not limited to, KYC (Know Your Customer) regulations, Foreign Corrupt Practices Act (FCPA), the Racketeering Influenced and Corrupt Organizations Act (RICO), USA Patriot Act and the Bank Secrecy Act, Financial



Action Task Force on Money Laundering (FATF), Office of Foreign Asset Control (OFAC), I.C.E., Homeland Security, Foreign and Domestic Customs Authorities, Organization for Economic Cooperation and Development(OECD) – Convention on Combating Bribery of Foreign Public Officials in International Business, Specifically Designated Nationals(SDN), Interpol or other legal government or law enforcement agencies or divisions.

If you have any questions or concerns about our Data Processing Statement & GDPR Privacy Policy please contact Tina Sorrels, Corporate Secretary at tsorrels@ajcgroup.com or via phone at 404/229-0207.