

Public Records Privacy Policy

Introduction

This Privacy Notice provides critical information about who we are, how and why we collect, store, use, and disclose personal information, and details regarding individuals' rights in relation to the personal data we hold. It also explains how to contact us and what steps to take if you have any complaints about the way we process personal information. Please read this notice carefully.

Our Mission

ADAMftd Pte Ltd exists to enhance and promote transparency within the global corporate and business world. Our goal is to increase the visibility of business entities, including their existence, ownership, and activities, and the people connected with them for the broader public benefit. This mission includes identifying and exposing corruption, money laundering, and other criminal activities by maintaining an archive of information that is collected from various public sources.

Who We Are

ADAMftd Pte Ltd is a company incorporated in Singapore. We collect, use, and make available certain personal data in accordance with this Privacy Notice and in compliance with applicable data protection laws, including the General Data Protection Regulation (GDPR) where applicable. For the purposes of the GDPR, we act as a "controller" of personal data.

The Personal Information We Collect, Sources, and How We Use It

Most countries publish information about companies as part of their official public record, often including details about the ownership and officers associated with the company. This information typically contains personal data since the owners and officers are often individuals.

We collect this information from the following public sources worldwide:

- Official company registers (e.g., ACRA in Singapore, Companies House in the UK, etc)
- Government gazettes
- Trademark and/or patent registrars
- Ship registrars
- Charity registers
- Other regulatory data sources
- Customs bureaus
- Statistics bureaus
- Media outlets for public news
- Government sanctions offices
- Government statistics offices
- Stock exchanges
- Shipping bureaus
- Ports and port agents
- Logistics and shipping firms
- Trade finance companies
- Any other authoritative sources

The specific information we collect may vary depending on the territory and the information available in the official public record for that region. We strive to be transparent about the sources of our data and wherever possible, we provide a link to the source of the data we have collected.

Types of Personal Data Collected

If you are or were an officer, shareholder, or ultimate beneficial owner of a company, or a sole trader registered with a company registry, we may collect and process the following personal information about you:

- Name
- Address
- Unique identifier
- Partial or full date of birth
- Occupation
- Nationality
- Details of the company you are or were an officer for, and filings that refer to you
- Details of your relationship with the company, such as your position (e.g., shareholder/director) and period of association (start and end dates)
- Gazette notices referring to you

If you are the registered owner of a trademark, license, or trading/"doing business as" name related to a company record held by ADAMftd, we may collect and process your name and address in our public records register.

Use of Collected Information

ADAMftd processes this information to fulfill our transparency mission by:

1. Compiling a comprehensive database of international sanctioned entities, trade transactions, company, and company officer profiles, based on publicly available corporate, trade and economic data.
2. Enabling members of the public to access this database through the ADAMftd platform which is accessible via our website to subscribed users.
3. Providing data via API and bulk downloads to third parties, such as financial institutions, public authorities, NGOs, journalists, and academics for investigative, compliance, and research purposes.

Who Can Access the Information Collected by ADAMftd

We make our services available to:

- The public via our website.
- Third parties via our API and bulk downloads.

The third parties to whom we make our database available include:

- Commercial entities, including, but not limited to, manufacturers, international exporters and importers, trade finance companies and financial institutions conducting due diligence checks.
- Public authorities, including foreign direct investment agencies, export promotion agencies, economic development agencies, government trade ministries, and law enforcement agencies investigating corporate crime and tax evasion.
- NGOs, journalists, and academics for journalism and research purposes.

We may also share information, including personal data, with law enforcement or other authorities if required by applicable law.

How Long We Keep Personal Information

The information we collect forms part of our historical archive of company data. We aim to provide a complete and accurate picture of historical economic activity and corporate connections, including historical transactions and corporate connections. Therefore, we do not automatically delete or remove information from our records register after a certain period. Maintaining this information is crucial for our mission and particularly important for investigative purposes.

Legal Grounds for Processing Personal Information

The lawful basis we rely on for processing personal information in our public records register is primarily grounded in Article 6(1)(f) of the General Data Protection Regulation (GDPR). This article allows for the processing of personal data when it is necessary for the purposes of the legitimate interests pursued by the data controller or a third party, provided these interests are not overridden by the fundamental rights and freedoms of the data subject which require protection of personal data.

Commented [MOU1]: Is this sufficient legal basis for us?

Legitimate Interests Pursued by ADAMftd

Our legitimate interests include the following key aspects:

1. **Enhancing Transparency in International Trade:**
 - **Supply Chain Traceability:** We enhance transparency across supply chains, enabling companies to trace their supply chains and conduct due diligence on their suppliers in a more transparent manner.
 - **Risk Reduction:** By providing detailed information on suppliers, their networks, and potential trading partners, we help companies and governments to reduce risks in their supply chains.
 - **Compliance with Supply Chain Transparency Laws:** Our data aids companies in complying with various supply chain transparency laws, such as anti-slavery, anti-child labor, conflict mineral, and other traceability laws.
 - **Extended Supply Chain Visibility:** We provide visibility not only into direct supply chains but also into the suppliers and customers of those suppliers, identifying potential sanctioned entities and reducing compliance risks.
2. **Enhancing Corporate Transparency:**
 - **Mission Fulfillment:** Our primary mission is to increase and promote transparency in the corporate and business world. This involves providing detailed information about the existence, ownership, and activities of business entities, as well as the people connected with them.
 - **Public Benefit:** By maintaining and providing access to a comprehensive public records register, we contribute to a more informed public, enabling individuals and organizations to engage with companies on a global basis with greater confidence.
3. **Public Access to Comprehensive Corporate Data:**
 - **Information Availability:** We aim to substantially enhance access to a complete picture of the corporate world for a wide audience, including members of the public, journalists, law enforcement agencies, financial institutions, NGOs, and researchers.
 - **Corporate Accountability:** Providing corporate data plays a crucial role in identifying and exposing corporate corruption, malpractice, fraud, tax evasion, money laundering, and other illegal activities. This supports the broader goal of fostering a more trustworthy and transparent business environment.
4. **Data Accuracy and Reliability:**
 - **Facilitating Error Detection:** By enabling easy access to data held within official registers, we contribute to the achievement of corporate data accuracy and reliability. This facilitates the detection of errors or questionable aspects of the data, thereby improving the quality of corporate information available to the public.
5. **Combating Corporate Crime:**
 - **Law Enforcement Support:** Our data processing activities support the fight against corporate crime, including activities such as money laundering, tax evasion, and other forms of financial crime. By making this data available, we assist law enforcement agencies and other relevant authorities in their investigative efforts.

- **Creating a Trusted Environment:** Our efforts contribute to creating a more trusted corporate environment for all stakeholders, which is essential for the healthy functioning of markets and economies.
 - **Counterfeit Prevention:** We help combat counterfeit products in international trade, which is a significant issue not only for brand protection but also for public health, safety, and economic security.
 - **Trade-Based Money Laundering Prevention:** Our platform helps identify and prevent trade-based money laundering, where trade transactions are used to disguise the origins of illegally obtained money.
 - **Sanctioned Entity Exclusion:** We help reduce the involvement of sanctioned entities in legitimate supply chains, ensuring compliance with international sanctions and improving supply chain integrity.
6. **Transparency and Supply Chain Mapping:**
- **Supply Chain Transparency:** We enhance transparency across supply chains, helping entities to understand their supply chains better and comply with various legal requirements.
 - **Traceability Laws Compliance:** Our data aids companies in meeting their obligations under anti-slavery, anti-child labor, conflict mineral, and other traceability laws, ensuring ethical practices across their operations.
7. **Global Sanctions Data:**
- **AML and KYC Compliance:** We serve as a single source of information for global sanctions data, assisting entities in complying with Anti-Money Laundering (AML) and Know Your Customer (KYC) legal requirements. This helps organizations to identify and avoid transactions with sanctioned entities and individuals, thereby ensuring regulatory compliance.

Balancing Interests and Data Subject Rights

In processing personal data based on our legitimate interests, we take careful steps to ensure that these interests are balanced against the rights and freedoms of the individuals whose data we process. The benefits of our data processing activities are significant and include:

- **Transparency and Public Insight:** The enhanced transparency provided by our database helps the public gain better insights into the corporate landscape.
- **Corporate Responsibility:** The availability of accurate corporate data holds companies and their officers accountable, discouraging illicit activities and fostering a culture of compliance and ethical behavior.
- **Support for Investigations:** The data we provide supports crucial investigations by law enforcement and regulatory agencies, aiding in the detection and prevention of financial and corporate crimes.
- **Regulatory Compliance:** Our platform supports entities in meeting various regulatory compliance requirements, including AML, KYC, and supply chain transparency laws, thereby promoting ethical business practices and reducing the risk of legal penalties.

We are committed to maintaining transparency about our data processing activities and ensuring that individuals' rights are respected. Our practices are designed to comply with applicable data protection laws, including the GDPR, and we continuously review and update our processes to reflect best practices in data protection and privacy.

Specific GDPR Provisions

Under the GDPR, our data processing activities are aligned with the following specific provisions:

- **Article 5 (Principles Relating to Processing of Personal Data):** We adhere to principles such as lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity, and confidentiality.

- **Article 6 (Lawfulness of Processing):** Our reliance on legitimate interests (Article 6(1)(f)) is based on a careful assessment to ensure that our interests are not overridden by the data subject's interests or fundamental rights and freedoms.
- **Article 13 and 14 (Information to be Provided to Data Subjects):** We ensure transparency by providing clear and comprehensive information about our data processing activities to data subjects.

Commented [MOU2]: Is this possible/feasible given the scope of data? 300M+ companies and 800M+ related people contacts

Transfer of Information Internationally

Given the global nature of our web-based service, information in the ADAMftd public records register can be accessed from anywhere in the world. For transfers of our public records to third parties, we take appropriate steps to safeguard personal data, such as data transfer agreements with those third parties, where required by law.

Security Measures

We have implemented appropriate security measures to prevent personal information from being accidentally lost or accessed in an unauthorized way. Additionally, we have procedures to handle any suspected data security breaches, including issuing public notifications as required by law.

Your Rights

Under data protection laws, individuals have rights regarding their personal data, including:

- The right to access personal data we hold about you.
- The right to correct any inaccuracies in your personal data.
- The right to object to our processing of your personal data.
- The right to request the erasure of your personal data.
- The right to request the restriction of processing your personal data.
- The right to data portability.
- The right to lodge a complaint with a supervisory authority.

Requests to exercise these rights can be submitted to us via our contact details. Each request will be assessed on a case-by-case basis, and we will communicate the outcome to you.

Commented [MOU3]: Is this sufficient legal remedy to the right being offered?

Redacting Information

Our database aims to provide an accurate account of company data as reflected in official public records. If a public company register removes or limits access to certain information due to exceptional circumstances, we will update our records accordingly and temporarily remove the relevant information from our database while this process is carried out.

Requests for redaction of personal information must be made by the individual concerned or their legal representatives and verified by us.

Information Regarding Minors

We do not intentionally process personal data about minors. However, on rare occasions, public records may include such information. If we become aware that data in our records clearly relates to minors, we will restrict access to logged-in users and add a no-index tag to prevent the information from appearing in search engine results.

How to Complain

We strive to resolve any queries or concerns you may have about our use of your information. However, you also have the right to lodge a complaint with a supervisory authority. The supervisory authority in Singapore is the Personal Data Protection Commission (PDPC), which can be contacted through their website.

Contact Us

For any questions or concerns about this Privacy Notice or our data practices, please contact us via email at support@adamftd.com



Changes to This Privacy Notice

This Privacy Notice was first published on the 30th June 2024. We may update this notice periodically to reflect changes in our practices or applicable laws. The latest version of this Privacy Notice will always be available on our website.