

# PRIVACY POLICY

In this Privacy Policy the term "EU GDPR" means the EU General Data Protection Regulation 2016/679 enforced as of 25 May 2018; together with all other applicable legislation relating to privacy or data protection.

CSC means a group of companies that provides capital market services in Europe. Each company has its registered address in a member state of the European Union or in future, because of BREXIT, in a member state of the European Union or in the United Kingdom:

CSC Capital Markets (Luxembourg) S.à r.l., 2, route d'Arlon, L-8008 Strassen;

CSC Capital Markets (Ireland) Limited, 3<sup>rd</sup> Floor Fleming Court, Fleming's Place, Dublin 4, Ireland

CSC Share Trustee Services (Ireland) Limited, 3<sup>rd</sup> Floor Fleming Court, Fleming's Place, Dublin 4, Ireland

CSC Capital Markets UK Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ,

CSC Corporate Services (UK) Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ,

CSC Directors (No. 1) Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ,

CSC Directors (No. 2) Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ,

CSC Trustees Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ,

Emerging Markets Trustee Limited, Level 37, 25 Canada Square, Canary Wharf, London E14 5LQ.

## CSC Privacy Policy

In this Privacy Policy, references to "you" and "your" are references to a user of our website, , an individual who submits a job application to CSC, or other individuals whose personal data we handle in the course of carrying on our commercial activities. Those individuals could be clients or prospective clients or their representatives, agents or appointees, or employees, directors, officers or representatives of another organisation with which we have a business relationship.

## About this Privacy Policy

We are committed to protecting and respecting your privacy and handling your information in an open and transparent manner. This Privacy Policy explains how we handle and protect your personal data, how we gather this data, and how we manage this data to serve you. We may change this Policy from time to time as the need arises to accurately reflect how we process personal data.

This Privacy Policy is effective as of May 25, 2018.

## **1. What is Personal data?**

“Personal data,” where used in this Privacy Policy, shall mean any information or set of information that identifies an individual, or could be used by or on behalf of CSC with other information to identify an individual, and shall include any data about an identified or identifiable individual that are within the scope of EU GDPR and recorded in any form. Personal data does not include information, where the identity has been removed (encrypted or anonymized).

We may refer to your personal data as your information and may sometimes collectively refer to handling, collecting, protecting and storing your personal data as "processing" such personal data.

## **2. Scope of this Privacy Policy**

This Privacy Statement applies to personal data submitted to, or collected by us.

## **3. Administration of this Privacy Policy**

Any questions or concerns about the interpretation or operation of this Privacy Policy or about what may or may not be done with regard to personal information should be directed in the first instance to our legal department, which can be contacted at [insert contact details].

## **4. What information we collect, and why**

CSC collects, uses, stores and transfers different kinds of personally identifiable information which can be grouped together as follows:

- Identity Data includes first name, last name, marital status, title, date of birth and gender.
- Contact Data includes home or work address, email address and telephone numbers.
- Marketing and Communications Data includes your preferences in receiving marketing from CSC and your communication preferences.
- Website Data which includes your IP address, your browser type and language and information about your visit to our website, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs) and methods used to browse away from the page.
- Compliance Data: if legally required to collect Know Your Customer / Anti Money Laundering information from relevant individuals.
- Recruitment Data: if you are applying for a job at CSC your date of birth, personal characteristics such as gender, your right to work, visa status educational and professional qualifications and previous employment history and any other personal data you disclose during your application.
- Contract Information: necessarily processed in a project or contractual relationship with CSC or voluntarily provided by a relevant individual such as personal data relating to orders placed, payments made, requests, and project milestones.

Some CSC services may require additional information, which we will inform you of when we request such information.

## **5. How we collect your information**

CSC may collect or obtain personal data directly from you (for example by completing a form related to a service request or to a KYC procedure) or indirectly because other people give that data to us (for example your employer or adviser or third party service providers that we use to help operate our business) or because it is publicly available.

We generally do not require you to provide sensitive personal data, such as that which reveals race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or information that concerns health or sex life.

Like most websites, we use "cookies" to help us make our site – and the way you use it – better. Cookies mean that a website will remember you. They're small text files that sites transfer to your computer (or phone / tablet). They improve website use and speed – for example by automatically filling your name and address in text fields. There are more details in our section on Cookies below.

## **6. How we use your information**

Our primary purpose in collecting user information is to administer the day to day running of our company and to administer our business relationships.

We may use the personal data we collect:

- to provide you with information, or services which you have requested;
- planning, performing and managing our contractual relationships
- for compliance with statutory and regulatory obligations of CSC or internal policy requirements and the order of a competent court, as well as (but not limited to) accounting, commercial communications, know-your-customer and anti-money laundering requirements, general management of the services or customer relationship purposes.
- to contact you in connection with support-related activities;
- to fulfill any other purpose for which you provided it;
- for billing purposes;
- in connection with services CSC receive from professional advisors, such as lawyers and consultants or other service providers either to execute CSC' contractual obligations toward you or CSC' clients or more generally for legitimate business interest personal data.
- to solve disputes, enforce our contractual agreements and to establish, exercise or defend legal claims
- in any other way we may describe when you provide the data; and/or
- for any other purpose with your consent.

We may also use your personal data to contact you about our services or the services of our affiliates that may be of interest to you. If you do not want us to use your information in this way, or any of the ways described above:

- (i) contact us at the address below;
- (ii) check the relevant box or ensure the relevant box is checked on the form on which we collect your personal data for this purpose, or
- (iii) follow the unsubscribe instructions in the email or other communication you have received.

## **7. Legal basis for using your personal information**

The EU GDPR permits us to process your personal data in the way that it does because the processing is:

- necessary for the purposes of the legitimate interests that we pursue, which are to run and administer our business, to discharge our legal obligations to store and disclose information where necessary and to evaluate, develop and improve our goods / services and for the purposes set out in this Policy; and/or
- necessary for the performance of our contract; and/or
- necessary in order to comply with a legal obligation to which we are subject.

## **8. Disclosure and transfer of your information**

In some instances, we may be asked to disclose certain personal data pursuant to a court order, subpoena, search warrant, or law enforcement request. We may also disclose your information in order to enforce our terms of use or to protect the rights, property, or the personal safety of (in each case) us, our staff, customers, and others. In addition, we may disclose your information in order to permit us to pursue available remedies or limit the damages that we may sustain, to respond to an emergency. Please note that CSC may be required to release an individual's personal information in response to lawful requests by public authorities, including to meet national security and law enforcement requirements.

## **9. CSC affiliates and service providers**

We may disclose your personal data on a need-to-know basis to any member of our company group registered in an EU member state, in the UK or in the US.

From time to time, we may engage our affiliated entities or other carefully selected third parties registered in an EU member state or in the UK to provide services on our behalf, in particular to collect, process, and use your personal data as required to provide services to you (i.e. audit, tax or law firms). We may disclose your information to such service providers in compliance with applicable

data protection law, and provided that they agree to use your information only for the purposes of providing the services. We will not disclose your personal data to a third party data controller without complying with the European GDPR including those relating to notice and choice unless otherwise required by law.

When using third-party vendors or agents with registered address in the EU member states or in the UK to which CSC intends to transfer personal data, CSC shall perform adequate due diligence to help ensure the security of such information, including ensuring that such third party has entered into a written agreement with CSC requiring the third party to provide at least the same level of privacy protection as is required by the EU GDPR. CSC shall continue to be liable under the EU GDPR if third parties to which CSC has transferred personal data for processing on CSC's behalf do so in a manner that is inconsistent with the EU GDPR. However, CSC will not be liable if it can prove that it is not responsible for the event that caused damage.

The personal data we receive will be held on our computers and systems in and may be accessed by or given to our staff, one of our affiliates or carefully selected suppliers working in the EU member states or in the UK. Your personal data may be transferred to, and stored at, a destination outside the European Economic Area ("EEA") to a country not deemed to provide adequate protection of your information by the European Commission, and may also be processed by staff operating outside the EEA who work for us, or for one of our service providers, related companies, agents or contractors.

Where recipients are outside the EEA we ensure that the recipient provides an adequate level of protection for your personal data or the transfer is otherwise permitted under applicable EU GDPR, by methods including using standard contractual clauses and by relying on a relevant adequacy decision by the European Commission.

We do not generally rely on your consent as the legal basis for transferring your personal data to outside the EEA, however where we feel it is necessary or appropriate we may seek to rely on your consent as the legal basis for such processing. Where we do, you may withdraw your consent at any time in the manner described below.

## **10. Opting Out**

Where required by EU GDPR, you will be given a choice when you provide us with your personal information to opt into certain uses we may intend to make of that information, such as sending you information or offers containing updated information about us, our services and promotions. You may also be asked if you would like to receive marketing from third party organisations. You will be able to indicate your consent to each specific proposed use by checking the relevant box to opt in. We will not send you direct marketing, or pass your details to third parties for the purpose of them sending you direct marketing, without your consent.

You also have the option of "unsubscribing" from our mailing list at any time, thereby disabling any further such e-mail communication from being sent to you.

Details of how to unsubscribe will be included on each electronic mailing we send you. Alternatively, just send an email to [[onlinemarketing@cscglobal.com](mailto:onlinemarketing@cscglobal.com)] with "URGENT – UNSUBSCRIBE REQUEST" in the subject line and the email address that you wish to be removed within the email.

We will action any opt out request from you without delay, and in any event within one month.

### **11. Steps we take to ensure your privacy**

The security of your personal data is important to us. We use generally accepted, industry standard tools and techniques to protect your personal data against unauthorized disclosure. However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, while we strive to use commercially reasonable means to protect your personal information, we cannot guarantee its absolute security.

### **12. Perimeter security**

We use firewalls to secure the perimeter of our information network and monitor our systems regularly.

### **13. Social engineering (our employees)**

All of our employees are made aware of and reminded of our Confidentiality of Client Information Policy regularly, and must acknowledge that they have received and read it.

### **14. Your rights in relation to your personal information**

At any time, you have the right:

- to be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- to request access to or a copy of any personal data which we hold about you;
- to rectification of your personal data, if you consider that it is inaccurate;
- to ask us to delete your personal data, if you consider that we do not have the right to hold it;
- to withdraw consent to our processing of your personal data (to the extent such processing is based on previously obtained consent);
- to ask us to stop or start sending you marketing messages at any time by using the below contact details;
- to restrict processing of your personal data;
- to data portability (moving some of your personal data elsewhere) in certain circumstances;
- to object to your personal data being processed in certain circumstances; and
- to not to be subject to a decision based on automated processing and to have safeguards put in place if you are being profiled based on your personal data.

Individuals wishing to access their personal information must do so in writing by contacting [CSC's *Information Security and Privacy Team*] directly at [[InformationSecurity@cscglobal.com](mailto:InformationSecurity@cscglobal.com)]. CSC will endeavor to respond within a reasonable period and in any event within one month in compliance with EU GDPR. We will comply with our legal obligations as regards your rights as a data subject.

If you wish to exercise any of the other rights detailed above please contact us at [[InformationSecurity@cscglobal.com](mailto:InformationSecurity@cscglobal.com)]

We will correct any incorrect or incomplete information and will stop processing your personal data, or erase it, where there is no legal reason for us to continue to hold or use that information.

We aim to ensure that the information we hold about you is accurate at all times. To assist us in ensuring that your information is up to date, do let us know if any of your personal details change.

If you wish to exercise any of the other rights detailed above please contact us at [[cme-gdpr@cscgfm.com](mailto:cme-gdpr@cscgfm.com)] or if you require additional assistance you may contact our Customer Service staff from 9:00 a.m. to 6:00 p.m. Luxembourg Time, Monday through Friday, for Luxembourg at: phone: +352 26 11 94 78, for the UK at: phone: +44 207 513 2319 and for Ireland at: phone: +353 1 566 8890

CSC users who report suspected or known security events that may jeopardize the confidentiality, integrity, or availability of CSC information, information systems, or information processing facilities shall not be retaliated against, intimidated, or otherwise prevented or harassed for making such a report.

#### **15. How long we keep your information**

We will only keep the information we collect about you for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

We may send you direct marketing communications, and retain your contact information necessary for this purpose, (provided that you have consented to receiving them) for as long as you do not unsubscribe from receiving the same from us.

#### **16. Contact details and independent recourse mechanism**

Any questions, complaints, access requests, and any other issues arising under the EU GDPR should be directed first to [cme-gdpr@cscglobal.com](mailto:cme-gdpr@cscglobal.com)

In compliance with the EU GDPR, CSC commits to resolve complaints about your privacy and our collection or use of your personal information. European Union or Swiss individuals with inquiries or complaints regarding this Privacy Policy should first contact CSC at [cme-gdpr@cscgfm.com](mailto:cme-gdpr@cscgfm.com) .

CSC has further committed to refer unresolved privacy complaints under the EU GDPR to an independent dispute resolution mechanism, the BBB EU Privacy Shield, a non-profit alternative dispute resolution provider located in the United States and operated by the Council of Better Business Bureaus. If you do not receive timely acknowledgment of your complaint, or if your complaint is not satisfactorily addressed, please visit [www.bbb.org/EU-Privacy-Shield/for-eu-consumers/](http://www.bbb.org/EU-Privacy-Shield/for-eu-consumers/) for more information and to file a complaint.

If your complaint is not satisfactorily addressed, and your inquiry or complaint involves human resource data transferred from the EU in the context of the employment relationship, you may have your complaint considered by an independent recourse mechanism: for EU/EEA Data Subjects, a panel established by the EU data protection authorities ("DPA"), and for Swiss Data Subjects, the Swiss Federal Data Protection and Information Commissioner ("FDPIC"). To do so, you should contact the state or national data protection or labor authority in your jurisdiction (e.g. the ICO in the UK). CSC agrees to cooperate with the relevant national DPAs and to comply with the decisions of the DPA Panel and the FDPIC.

Should your complaint remain fully or partially unresolved after a review by CSC, BBB EU Privacy Shield and the relevant DPA, you may be able to, under certain conditions, seek arbitration before the Privacy Shield Panel. For more information, please visit [www.privacyshield.gov](http://www.privacyshield.gov).

## **17. Controller and local representatives**

Each of the CSC companies mentioned above might act as controller (when collecting, processing, and using personal data collected in relation to data provided).

Complaints or concerns about this Privacy Policy should be directed to our management who can be contacted at [cme-gdpr@cscgfm.com](mailto:cme-gdpr@cscgfm.com). We will investigate and attempt to resolve such complaints in accordance with the principles contained in this Privacy Policy.

## **18. Cookies**

### **18.1. Our use of cookies**

CSC set and access cookies and similar technology on your device to obtain information about how you access and use the Site. This helps us to provide you with a good experience and allows us to improve the Site. Unless you have adjusted your browser settings so that it will refuse cookies, the Site will set cookies when you load and navigate them.

### **18.2. What are cookies?**

Cookies are text files containing small amounts of information which are downloaded to your device when you visit a Site. Cookies are then sent back to the originating Site during your browsing session or on each subsequent visit, or to another Site that recognises that cookie. The cookies we set do lots of different jobs, like help us to improve the Site and deliver a better and more personalised service,



remember your preferences, and generally improve the user experience. You can find more information about cookies at <http://www.allaboutcookies.org/>.

### **18.3. Cookies can be categorised as follows:**

- Strictly necessary cookies – these cookies are essential in order to enable you to move around a Site and use its features and enable services you have specifically asked for. Consent is not generally required for these cookies.
- Performance cookies – these cookies collect information about how visitors use a Site (for example, by recording which pages or features visitors use most often (usually on an anonymous basis)).
- Functionality cookies - these cookies allow a Site to remember the choices a user makes, such as a user name or language preference.
- Targeting or advertising cookies - these cookies collect information about a user's browsing habits and are usually placed by advertising networks with the Site operator's permission.

Cookies can also be categorised in accordance with how long they are saved on your device: "session cookies" are short-term cookies that are only saved on the device's memory for the duration of a user's visit to the Site, whereas "persistent cookies" remain saved in the device's memory for a set period of time, even after the browser session has ended.

### **18.4. Refusing or restricting cookies**

You may refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. The "Help" or "Internet Settings" functions within your browser should tell you how. Alternatively, you may wish to visit <http://www.allaboutcookies.org/> which contains detailed information on cookies and how to delete, restrict or block them on a wide variety of browsers. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual.

Please be aware that if you select to refuse or restrict cookies you may be unable to access certain parts of the website.