

## GLOBAL PRIVACY NOTICE

### 1. Important information and who we are

- 1.1. As a global company, Equiti and its Affiliates<sup>1</sup> (the “**Equiti Group**”) collect, use and share personal information when you use any service that it offers. This global privacy notice has been created to cover how the Equiti Group (“**We**”, “**us**”, “**our**”) collect, use and disclose personal information and is relevant to Equiti Group website visitors and users of Equiti Group's services. The notice describes the types of personal information we collect, the purposes for processing that personal information, the third parties we share your personal information with and the security measures we have implemented to keep your personal data secure. It also sets out the rights and choices of individuals and how to contact us about the information contained in this global privacy notice, wherever you are in the world.
- 1.2. Where any entity within the Equiti Group acts a controller, the controller will be deemed to be the Equiti Group entity listed on the terms and conditions that you enter into when using an Equiti Group service.
- 1.3. This global privacy notice sets out some core content and, where applicable, can be read in conjunction with any supplemental privacy notices as required by country specific law. This is where certain country specific information, such as individuals' rights can be found. In the absence of any country specific information, this privacy notice will apply.
- 1.4. Our global privacy notice, and any associated country-specific privacy notices will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing global environment.

### 2. Data protection principles

The Equiti Group seek to comply with all data protection laws that are applicable around the world. Where possible, we have adopted the core principles set out in the GDPR to inform how we collect and use your personal information. The principles are as follows:

- a) used lawfully, fairly and in a transparent way;
- b) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- c) relevant to the purposes we have told you about and limited only to those purposes;
- d) accurate and kept up to date;
- e) kept only as long as necessary for the purposes we have told you about; and
- f) kept securely.

### 3. The kind of personal information we collect and use about you

Personal information or personal data means any information about a living individual from which that person can be identified, even without any linkage to their name. It does not include data where the identity of the individual has been completely and permanently removed (which is called anonymous or anonymised data). The types of personal information we collect include the following categories:

- a) Identity and Profile;
- b) Contact;
- c) Financial;
- d) Usage;
- e) Transaction;

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<sup>1</sup> Equiti and its Affiliates are companies that are directly or indirectly owned or controlled by Equiti Group Ltd.

- f) Marketing and Communications; and
- g) Technical.

Examples of these categories are set out in the table below in section 10.

#### 4. How is your personal information collected

We collect information from you where you fill in forms on our website or by corresponding with us by phone, email or otherwise. It includes information you provide when you register to use our website, when you report a problem with our site or when you contact us to discuss any aspect of your account with us. When you visit our website, access our services, engage with our emails and online ads, we may collect information by automated means. For more information on how we collect your data, please refer to the Cookies Policy on our website.

- a) We obtain most of the customer personal information shared with us directly through account applications or other submission forms, and from maintaining records of customer information provided in the course of our ongoing customer service. We may also obtain information from other sources to meet certain regulatory requirements.
- b) On occasion, we will ask for other information voluntarily (for example, through market research, surveys or special financial promotion offers) to enable us to improve our service or consider the wider needs of our customers.

##### Information we receive from other sources

- c) On occasion, we will collect your personal information indirectly and through a third party. Examples of this include our use of credit reference agencies to perform KYC (client verification) and AML (anti-money laundering) checks.

#### 5. How do we use your personal information

5.1. We will only use your personal information when applicable data protection law permits us to, including by identifying any necessary lawful bases for processing (i.e. a legally permissible reason for processing your personal information). Please check the relevant country-specific notices below to ensure that there are no differences in your specific jurisdiction.

5.2. The table below contains the purposes we plan to use your personal information, the types of data applicable to this purpose and the applicable lawful basis for our processing activities:

Purpose	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new client	(a) Identity and profile (b) Contact	Performance of a contract with you
To process your transaction including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity and profile (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

<p>To manage our relationship with you which will include:</p> <ul style="list-style-type: none"> <li>(a) Notifying you about changes to our changes to our terms or privacy policy</li> <li>(b) Asking you to leave a review or take a survey</li> </ul>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary to comply with a legal obligation</li> <li>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
<p>To enable you to partake in a prize draw, competition or complete a survey</p>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Usage</li> <li>(d) Marketing and Communications</li> </ul>	<ul style="list-style-type: none"> <li>(a) Performance of a contract with you</li> <li>(b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)</li> </ul>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Technical</li> </ul>	<ul style="list-style-type: none"> <li>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</li> <li>(b) Necessary to comply with a legal obligation</li> </ul>
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Usage</li> <li>(d) Marketing and Communications</li> <li>(e) Technical</li> </ul>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> <li>(a) Technical</li> <li>(b) Usage</li> </ul>	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Technical</li> <li>(d) Usage</li> </ul>	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>
<p>If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of use or other agreements, or to protect the rights,</p>	<ul style="list-style-type: none"> <li>(a) Identity and profile</li> <li>(b) Contact</li> <li>(c) Financial</li> <li>(d) Transaction</li> <li>(e) Marketing and Communications</li> </ul>	<p>Necessary to comply with a legal obligation</p>

property, or safety of Equiti, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.		
In the event that we engage in M&A activity, including any reorganisations, selling or buying any business or assets, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock.	(a) Identity and profile (b) Transaction	Necessary for our legitimate interests (where it is necessary for the sale of the business or shares to disclose the data to a potential buyer)

## 6. Disclosures of personal information

We share your personal information with our trusted third parties as part of the operation of our global business. Your personal data will be shared with the following categories of recipients:

- a) other companies within the Equiti Group of companies who provide financial and other services;
- b) service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance or other similar or related services;
- c) introducing brokers with whom, we have a mutual relationships;
- d) credit providers;
- e) courts, tribunals and regulatory and government tax authorities as agreed and authorised by law;
- f) reference and credit reference agencies. This includes exchanging information with other companies and organisations for the purposes of money laundering regulations, financial crime, fraud protection and mitigation of credit risk;
- g) anyone authorised by you to act on your behalf, as specified by you or by law through Power of Attorney;
- h) advertisers and advertising networks that require data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal information we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- i) analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- j) credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

## 7. Security

Protecting your personal information and your privacy is very important to us. At a global level, we have set high standards for data security. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed, altered or disclosed in an unauthorised manner. In addition, we limit access to your personal information to those employees and third parties who have a business

need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

## 8. International transfers

- 8.1. The Equiti Group is an international business that has operations and service providers around the world.
- 8.2. Where we transfer your personal information outside of the jurisdiction in which the relevant controller (pursuant to this privacy notice) is incorporated in (“Jurisdiction”), as well as to processors located outside of the Jurisdiction who are engaged on our behalf. Where we transfer your information outside of the Jurisdiction, we will ensure that the transfer is lawful and that there are appropriate security and contractual arrangements in place to safeguard such transfers.
- 8.3. If we transfer your personal data to another country that doesn’t offer a standard of data protection equivalent to the Jurisdiction from which your personal data is transferred from, we will ensure that your personal data is sufficiently protected through mechanisms such as (where applicable), (i) approved Standard Contractual Clauses; (ii) the UK Approved Addendum; (iii) Binding Corporate Rules; (iv) standard data protection clauses, certification or an approved code of conduct adopted by a supervisory authority within the Jurisdiction; or (v) a contractual framework deemed to provide an adequate level of protection for personal data.
- 8.4. To the extent applicable, please see any country-specific notices for additional details in relation to our international transfers and our appropriate safeguards in place.

## 9. How long we keep your personal information

- 9.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 9.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 9.3. To receive additional details around our retention periods, please contact us using the details in section 12 below.

## 10. Examples of the types of personal information we collect about you

We may collect, use, store, transfer and otherwise process different kinds of personal information about you, which we have grouped together as follows:

Type of personal information	Definition
<b>Identity and Profile</b>	Identity Data includes name, username or similar identifier, online account profile information, marital status, title, date of birth and gender.
<b>Contact</b>	Contact Data includes billing address, delivery address, location, country, email address and telephone numbers.
<b>Financial</b>	Financial Data includes bank account and payment card details.
<b>Usage</b>	Usage Data includes information about how you use our websites, mobile applications, Wi-Fi and similar electronic services.
<b>Transaction</b>	Transaction Data includes details about payments to and from you and other payment details of products/services you have purchased from us.

<b>Marketing and Communications</b>	Marketing and Communications Data includes your marketing and communication preferences.
<b>Technical</b>	Technical Data includes information collected when you access our websites or mobile applications, your internet protocol (IP) address, your login data, browser type and version, time zone setting and location and country, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access our websites or mobile applications.

## 11. Your rights

11.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data. These may include:

- a) the right to be informed;
- b) the right of access;
- c) the right to rectification;
- d) the right to erasure;
- e) the right to restrict processing;
- f) the right to data portability;
- g) the right to object; and
- h) rights in relation to automated decision making and profiling.

11.2. You can exercise your rights by contacting us using the details set out in section 12 below.

11.3. If you have concerns in relation with how we deal with your data, you have a right to complain to your local data protection authority, or to the data protection regulator in the country where you live or work.

## 12. How to contact us

If you have questions or comments about our privacy practices, or if you would like help exercising your privacy rights, you can contact us using the email address set out below:

[data.protection@equiti.com](mailto:data.protection@equiti.com)

## 13. Changes to our privacy notices

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.