

# EQUITY PLANS PRIVACY POLICY



# Equity Plans

## Privacy policy

We take the privacy and security of your personal data very seriously and at all times we will comply with the prevailing laws and regulations governing confidentiality, data protection and security of information. When we say **personal data**, we mean any information that is about you or which can help identify you.

This privacy policy explains how we use your personal data. It also explains your rights over your personal data, and how you can exercise them.

If you have any questions about this privacy policy or how we use your personal data, please contact our Data Protection Officer by writing to: The Pavilions, Bridgwater Road, Bristol, BS13 8AE or you can [email us](#).

In this policy the words **we**, **us** and **our** always mean Computershare Investor Services Plc. We are registered with the Information Commissioner's Office (ICO) in the UK with the registration number Z5325892.

### What personal data do we use?

In the context of providing equity plan services to you we will use the following information about you:

- Personal details such as your full name, current and previous addresses, nationality, date of birth, telephone numbers, e-mail addresses and National Identifier details.
- Details of your employment status and contribution details.
- Details of your shareholdings and transactions.
- Tax liability and payment information.
- Bank account details (account number and sort code).
- Information from law enforcement agencies.
- Details of your use of Computershare IT systems.

### Where do we obtain your personal data from?

We will collect your personal data in a number of ways. Much of the personal data we collect will be provided directly by you when you join an equity plan, sign up for services or when you contact us by email, letter, phone, or submit personal data online. We also generate payment, holdings and transaction data as a function of providing a service to you.

We may also receive your personal data from the following third parties:

- Your employer - if you are a participant in a company equity plan, your employer may provide us with your name, date of birth, contact details, identity information, share entitlement data, employment details, compensation and/or payroll information, and other personal data.
- Private brokers - if you request that we liaise with a private broker in respect of your shares we may receive personal data from the broker. The private broker's privacy policy should inform you what personal data they may send to us.
- Law enforcement or government agencies.
- Solicitors.

If you contact us via social media we may collect available details from your social media account. In addition, we may also collect information about you which can be obtained via open data sources and public records (e.g. the electoral register and information openly available via the internet), although we will only do this where it is necessary for the provision of services to you, where we have a legitimate interest in doing so or where we have a legal duty in the investigation and prevention of money laundering and financial crime.

When you visit our websites or open emails from us, we collect information about your website use and email viewing so we can improve our services. For more information about how we collect this information please see our [Cookie Policy](#).

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You may also provide personal data to us about other individuals, such as joint holders of securities. If you do this, you must confirm the other person agrees you may share their personal data with us and that we may use it in accordance with this privacy policy.

### How we use your personal data?

We use your personal data in the following ways:

- To identify you when you contact us.
- To deal with requests you send us.
- To maintain your account.
- To respond to your queries.
- To carry out your instructions in relation to your holdings, for instance to sell or transfer shares, or to vote and receive dividends.
- To keep records of your holdings and any transactions that we facilitate on your behalf.
- To inform you of your rights as a shareholder (or other security holder).
- To tell you about other services that you may use as a shareholder (or other security holder).
- To provide you services and to enable us to provide services to share issuers.
- To provide you updates on changes to our policies or terms and conditions.
- To help us improve our services.
- To analyse how people use our websites.
- For trend analysis to help us develop and improve our products and services.
- For profiling purposes to help us ensure that we provide you with the right information and offer you relevant services.
- If you agree, to contact you about other services and products we think may interest you.
- To comply with our legal and regulatory obligations, for example, transaction reporting under rules imposed by the Financial Conduct Authority.
- To deal with any complaints or legal claims.
- To detect, prevent and report financial crime.
- To manage our business in an efficient and proper manner, including the management of our financial position, our resources, the risks to which we are exposed and the way in which we arrange our internal operations.

### What is our legal reason for processing your personal data?

We will only use your personal data where we have a valid legal basis for doing so. The legal bases for us processing your personal data are that:

- It is necessary for us to process your personal data for us to perform our obligations under either a contract you have with us, or to take steps at your request before entering a contract with you or a contract we have with your employer or ex-employer.
- It is necessary for us to comply with a legal obligation to which we are subject.
- You have given consent to processing for one or more specific purposes.
- It is necessary for the purposes of legitimate interests pursued by us or by a third party, and those interests are not overridden by your interests or your fundamental rights and freedoms.

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### How do we share your personal data?

We share your personal data with other companies in a number of ways. This section provides details of the type of companies with which we may share your personal data and for what purposes.

### How we share your personal data to provide you with services

We may share your personal data with other companies to help us deliver services as follows:

- Other Computershare group companies who help us administer our services.
- Non-Computershare companies who help us provide services to you, including stockbrokers or market makers who execute trades at our instruction on your behalf.
- Non-Computershare companies who we appoint as custodian to provide safe custody of assets on your behalf.
- Non-Computershare companies who help us with administrative services, including mailing services and IT services.
- Non-Computershare companies who help us with marketing activities, where you have provided consent to this.
- Brokers you use in obtaining our services or to whom we transfer securities on your behalf.
- A global payment service provider, to enable global payments to be made (if you use global payment services).
- An appointed tax agent to facilitate the calculation of tax (if you use tax services or your employer or ex-employer instructs us to send information to their appointed tax agent as part of the services they provide to you).
- A savings carrier to support the provision and administration of your savings account (if you use our savings services in connection with participation in certain types of company equity plan).

Where we share your personal data with other companies to provide services to you, we ensure they have adequate safeguards to protect your personal data.

### Data sharing with companies in which you have a holding

When we provide services to you related to your shareholdings in a company (which we refer to in this privacy policy as the **Relevant Company**), we will share your personal data as follows:

- We will share information about your holdings, and any dealings with them, with any person acting as the Relevant Company's registrar or transfer agent so they can maintain the relevant share dealing register.
- If you receive vested share account or share plan account services, or other services related to equity plans, we may share your personal data with the Relevant Company, a nominee or trustee to facilitate the provision of the vested share account or share plan account service and/or administration of share plan(s) as applicable.
- If you receive nominee services from us, we will provide your information to the Relevant Company to facilitate the provision of the nominee account. This is so that the Relevant Company can inform you of your rights as a shareholder and keep you up-to-date on corporate matters.

### Other data sharing

We will also share your personal data in the following circumstances:

- Where we need to do so to comply with our legal or regulatory obligations (which may include sharing information with regulators, auditors or law enforcement agencies).
- In an effort to trace you if we lose contact with you.
- Where necessary to protect or defend our legal rights or the legal rights of another company or person.
- If our business, or any part of it, is transferred or sold (including where the Relevant Company requests that plan administration is migrated from us to a new provider), we will transfer your personal data to the company taking over our role, which could include a purchaser or the provider replacing us.

We will never sell your information to anybody for unsolicited marketing.

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### How long do we keep your personal data for?

We keep your personal data for as long as we need to for the purposes for which it was collected or (if longer) for any period for which we are required to keep personal data to comply with our legal and regulatory requirements.

### Do we transfer your personal data overseas?

We may administer accounts and provide you with some services through another member of the Computershare group, or another company which is based in a country where data protection laws and standards differ from those in your home jurisdiction, including India, Australia, and the United States. If you are in Europe this means we may send your personal data to countries outside the European Economic Area.

Where we send your personal data to another country, we will always ensure adequate measures are in place to safeguard it and to ensure you can exercise your rights effectively. If you would like more information about transfers to other countries and the ways in which we protect your personal data, please contact our Data Protection Officer by emailing [dataprotection@computershare.co.uk](mailto:dataprotection@computershare.co.uk).

### Your rights

#### Accessing your information

You may ask for a copy of the personal data we hold about you by contacting us at your nearest office. You may also request that personal data you have provided to us is transmitted to you or another organisation in an electronic format.

#### Correcting your information

We try to ensure all of your personal data is accurate. If you find any inaccuracies or if your details change, please notify us promptly and we will correct them.

#### Erasing or restricting use of your information

You may ask us to erase or restrict use of your personal data. If you do, we will comply with your request unless there is a legal reason for us not to (for example, if a law says we must retain records of share dealing for a fixed period and to do so we must retain your personal data, or if it is necessary for us to retain the personal data for the purpose of performing a contract with a share issuer).

#### Withdrawing consent

Where the legal basis for us processing your personal data is that you have given your consent to that processing, you may withdraw your consent at any time. If you do so we will stop processing your personal data promptly.

#### Objecting to processing

Where the legal basis for us processing your personal data is that it is necessary for the purposes of legitimate interests pursued by us or by a third party, you have the right to object to this processing. Where you object to such processing we will no longer process the personal data unless we can demonstrate legitimate grounds for the processing.

#### Marketing preferences

Where you have provided consent for us to provide you with marketing information, you can change your preferences in relation to marketing at any time by contacting us at [marketingpreferences@computershare.co.uk](mailto:marketingpreferences@computershare.co.uk).

Please note that where you contact us to exercise your data protection rights we may ask you to provide a form of identity verification before we can process your request.

#### Complaints

If you have any complaints about the way we use your personal data please contact our [Data Protection Officer](#) who will try to resolve the issue.

You also have the right to complain to the data protection supervisory authority in your country. If you need more information about how to contact your local data protection authority please let us know by contacting our Data Protection Officer.

