

## Liberum Privacy Notice

This Privacy Notice ("**Notice**"), together with our website terms of use and any other documents referred to in it, sets out the types of personal information Liberum collects, how we collect and process that information, who we may share it with in relation to the services we provide and certain rights and options that you have in this respect.

This Notice is addressed to individuals outside of our organisation with whom we interact, including visitors to our website, clients and potential clients (and individuals connected with our clients), contacts at firms we deal with in a non-client capacity, suppliers, and visitors to our offices and applies to personal data provided directly to us by individuals and to personal data provided to us by companies and other organisations.

We are committed to the protection of personal data and to fair and transparent processing. If you have any questions about this Notice, you can contact our GDPR Team via email at [gdpr@liberum.com](mailto:gdpr@liberum.com).

### Who is responsible for your personal data?

Liberum Capital Limited is the controller and responsible for your personal data. Liberum is incorporated in England and Wales (no. 5912554) with its registered address at Ropemaker Place, Level 12, 25 Ropemaker Street, London EC2Y 9LY. Liberum is authorised and regulated in the UK by the Financial Conduct Authority (FCA Register number 465050).

### Personal data we collect and how we will use it

We may collect and process personal data from you including:

- **Identity and Contact Data**, including your name, address, telephone number, date of birth, marital status, passport number, employment history, educational or professional background, tax status, employee number, job title and function, and other personal data required for us to perform our services to our clients or maintain our client relationship management system;
- **Business Information**, including information provided in the course of the contractual or client relationship between you or your organisation and Liberum, or otherwise voluntarily provided by you or your organisation;
- **Profile and Usage Data**, including your preferences in receiving marketing information from us, your communication preferences and information about how you use our websites(s) including the services you viewed or searched for, page response times, download errors, length of visits and page interaction information (such as scrolling, clicks, and mouse-overs). To learn more about our use of cookies or similar technology please check our cookies policy set out below;
- **Technical Data**, including information collected during your visits to our website(s), the Internet Protocol (IP) address, login data, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform. To learn more about our use of cookies or similar technology please check our cookies policy set out below;
- **Physical Access Data**, relating to details of your visits to our premises; and
- **Sensitive personal data**: in the course of our client services, we may be required to collect and use sensitive personal information relating to you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences).

We may use such data for the following purposes:

- to contact and interact with you to perform our obligations under our contract with you or your organisation;

- to carry out our legal and regulatory compliance obligations including anti-money laundering and terrorist financing checks and related actions which we consider appropriate to meet any legal or regulatory obligations imposed on us from time to time, or where the processing is in the public interest, or to pursue our legitimate interest to prevent fraud, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions on an on-going basis, in accordance with our anti-money laundering procedures;
- to monitor and record calls and emails to comply with our legal and regulatory obligations and ensure compliance with our policies and standards and for investigation and crime prevention purposes, and to enforce or defend our legal rights, or pursue our legitimate interests in relation to such matters;
- to report tax related information to tax authorities in order to comply with our legal obligation;
- to monitor and record calls for quality, training, analysis and other related purposes in order to pursue our legitimate interest to improve service delivery;
- to manage our relationships with you, develop and improve our business and services, maintain and develop our IT systems, manage and host events and to administer and manage our website, systems and applications;
- to manage access to our premises and for security purposes;
- to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities;
- to provide you with information about our products and services that may be of interest to you as well as informing you of any changes to our service; and
- for any other purposes relating or ancillary to any of the above or any other purposes for which your personal data was provided to us.

### **Information about other people**

If you provide personal data to us about any person other than yourself, you shall ensure that you have provide all necessary information to the relevant individuals (known as “data subjects”) about our use of personal data. You may refer data subjects to this Notice.

We will not use your personal data for taking any automated decisions affecting or creating profiles other than as described above.

### **Disclosure of your personal data**

We may disclose your personal data as follows:

- to our affiliated companies for the above mentioned purposes;
- to companies providing services for money laundering and terrorist financing checks and other fraud and crime prevention purposes and companies providing similar services;
- to courts, law enforcement authorities, regulators, governmental officials and other bodies as required by law or as requested;
- to third party vendors in order to process the personal data for the above mentioned purposes;
- to our and our affiliated companies’ professional advisers, subject to confidentiality obligations;
- if we have collected your personal data in the course of providing services to any of our clients, we may disclose it to that client, and where permitted by law to others for the purpose of providing those services; and
- to purchasers of the whole or part of our business or on any merger or group reorganisation.

The disclosure of personal data to the parties noted above, may include the transfer of personal data outside the European Economic Area (“EEA”). Such countries may not have the same data protection laws as your country. We only transfer personal information to these countries when it is necessary for the services we provide to you, or it is necessary for the establishment, exercise or defence of legal claims or subject to safeguards that assure the protection of your personal information, such as European Commission approved standard contractual clauses.

Please contact our GDPR Team for more information.

### **Security of your personal data**

We have policies, procedures and training in place in respect of data protection, confidentiality and information security. We regularly review such measures with the objective of ensuring their continuing effectiveness.

### **Failure to provide personal data**

Where we need to collect personal data to comply with our legal and/or regulatory obligations or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

### **Your Rights**

You have a right to update your personal data that we hold. To do so, please either contact your usual Liberum contact or otherwise contact the GDPR Team via e-mail at [GDPR@liberum.com](mailto:GDPR@liberum.com).

Where we process your personal data based on your consent, you have a right to withdraw consent at any time. Should you wish to do so, please contact our GDPR Team via e-mail at [GDPR@liberum.com](mailto:GDPR@liberum.com).

In addition to the rights above, you may also have other rights in relation to your personal data that we hold, including a right to access, right to rectify, right to erasure/deletion, right to restrict the use, the right to data portability and the right to restrict and/or object to our continued processing of personal data.

You may exercise the rights set out above by contacting our GDPR Team. In the event you wish to make a complaint about how we process your personal data, please use the above contact details and we will endeavour to deal with your request as soon as possible. This is without prejudice to your right to lodge a complaint about our use of personal data to the Information Commissioner’s Office, the UK supervisory authority for data protection issues ([www.ico.org.uk](http://www.ico.org.uk)).

### **How long we keep your personal data**

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 or regulatory requirements and, where required for Liberum to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

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.

### **Changes to our Privacy Notice**

We reserve the right to update and amend this Notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we may

make to our Notice in the future will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our Notice.

### Cookies

Our website uses cookies to distinguish you from other users of our website. A cookie is a piece of data stored on a user's hard drive containing information about the user.

The cookies we use are "analytical" cookies. They allow us to recognise and count the number of visitors and to see how visitors move around the site when they are using it. This helps us to improve the way our website works.

The information below explains the cookies we use on our website(s) and why we use them:

- **Google Analytics cookies:** we use these cookies to collect information about how visitors use our website, including details of the site where the visitor has come from and the total number of times a visitor has been to our website. We use the information to improve our website and enhance the experience of its visitors.
- **CloudFlare Cookie:** we use this cookie to identify individual clients behind a shared IP address and apply security settings on a per-client basis. This cookie does not correspond to any user ID and does not store any personally identifiable information. This cookie is strictly necessary for CloudFlare's security features and cannot be turned off.
- **Local Shared Objects (Flash cookies):** we use Adobe Flash Player to deliver certain content. Local Shared Objects, otherwise known as Flash cookies, are used for this in order to check if your browser supports Flash.

By using our website you consent to our use of cookies as updated from time to time and the cookies we use will be stored on your device. However, you can choose to disable cookies by modifying the settings in your browser. You can find out how to do this, and find more information on cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org).

You can also find out how to disable Flash cookies at Adobe.com - see [www.adobe.com/products/flashplayer/security](http://www.adobe.com/products/flashplayer/security) for details.

If you do not accept our use of cookies as set out in this **Notice**, please set your internet browser to reject cookies. This may impair your ability to use our website.

### Contact Details

Questions, comments and requests regarding this Notice should be addressed to GDPR Team at [GDPR@liberum.com](mailto:GDPR@liberum.com), or send a letter to Liberum Capital Limited, GDPR Team, Ropemaker Place, Level 12, 25 Ropemaker Street, London EC2Y 9LY.