

Jefferies EMEA Privacy Notice

1. Introduction

This Privacy Notice explains what we do with your personal data. It describes how we collect, use and process your personal data, and how, in doing so, we comply with our legal obligations to you. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

This Privacy Notice applies to each of the following who interact with Jefferies International Limited and/or Jefferies GmbH (whether directly or through an affiliate in the Jefferies Group), their branches and/or subsidiaries (together “we” “our” or “us”): existing and prospective clients, suppliers, personnel of corporate clients/suppliers, other persons (excluding employees and job applicants to whom a separate privacy notice applies) and website users whose personal data we may process.

For the purpose of applicable data protection legislation, the company responsible for your personal data is (as applicable) Jefferies International Limited and/or Jefferies GmbH (each being a data controller), the details for which can be found in Section 11.

We may amend this Privacy Notice from time to time. Please just visit this page if you want to stay up to date, as we will post any changes here.

2. What types of personal data do we collect?

We will collect your contact details (name, telephone numbers, job title and email or postal addresses) when you engage with us in connection with our or your services in order to ensure our relationship runs smoothly. Where we are required to carry out verification checks, to comply with our legal and regulatory obligations, we will collect specific additional information about relevant individuals (such as directors and beneficial owners), including, for example, date of birth, payment details, tax residence information, copies of photo identification documents (such as a driving licence and/or passport/identity card), information about nationality/citizenship/place of birth, national identification numbers and other identity verification documents. We may also hold information that another person within your organisation has chosen to provide us.

Where existing or prospective corporate clients/vendors provide us with personal data relating to their directors, employees, officers, agents, clients or any other person, such information is deemed to have been provided on the basis that: (i) those individuals have been informed and understand that their personal data is being provided to us or our affiliates; (ii) those individuals have been provided with information regarding the collection, use, processing, disclosure and overseas transfer of their personal data; (iii) the client/vendor has a lawful basis (in accordance with applicable data protection laws and regulations) to provide such personal data to us; and (iv) those individuals are aware of their data protection rights and how to exercise them.

If you are an individual client we will collect personal data you provide when you: (i) apply for your account and are onboarded as a client; (ii) request or engage with us in connection with our services; and (iii) interact with us in relation to the management and administration of your account. The personal data you give us may include your name, postal address, e-mail address, phone number, financial information, bank account/payment details, identification documents and other relevant personal details.

We may also collect information relating to your online engagement with regard to material that we publish, which we use to ensure that our relationship management communications to you are relevant and timely and, where such material is subject to charges for accessing it, that you are charged the correct amount. In certain

circumstances, calls with you may be recorded and monitored (to ensure compliance with regulatory obligations), depending on the applicable local laws and requirements.

We do not collect or otherwise process sensitive personal data (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data) or criminal conviction/offence data unless it is necessary for compliance with a legal and/or regulatory obligation.

To the extent that you access our website we may also collect certain data from you via cookies, further details of which can be found in Section 10.

3. How do we collect your personal data

3.1 *Personal data that we receive directly from you*

We will receive personal data directly from you in two ways:

- Where you contact us proactively, usually by corresponding with us by phone or email or by filling in forms; and/or
- Where we contact you, either by phone or email, or through investment activities more generally.

3.2 *Personal data we receive from other sources*

Where appropriate and in accordance with any local laws and requirements, we may seek more information about you or your organisation from other sources by way of due diligence or other market intelligence including:

- From third party data providers and by analysing online and offline media (which we may do ourselves, or employ other organisations to do so for us);
- From delegate lists at relevant events; and/or
- From other limited sources and third parties (for example, from third party brokers and counterparties who may provide us with your details in accordance with any regulatory requirements).

3.3 *Personal information we collect automatically*

To the extent that you access our website or read or click on an email from us, where appropriate and in accordance with any local laws and requirements, we may also collect your data automatically or through you providing it to us. For more information please see Section 10.

4. How do we use your personal data and what is the legal basis?

Having obtained data about you, we then make sure we use it appropriately.

4.1 *Client data*

Investment Activities

If you are a client or prospective client we use the personal data you provide in the following ways:

- storing your details (and updating them when necessary) on our database in order that we can contact you in relation to our ongoing services, agreements or dealings with you, including relevant offerings;
- managing and administering your account (and this may require that we verify information you provide in the course of your onboarding as a client and to carry out credit checks or assessments about you or your directors, officers and employees);
- to carry out our obligations arising from our contracts with you;
- undertaking anti-money laundering and know your client checks in accordance with our legal and regulatory obligations;
- maintaining records of our conversations and meetings so that we can provide relevant services to you and in order to comply with our legal and regulatory obligations;
- for internal analysis and research in order to facilitate the provision of relevant services to you;
- in more unusual circumstances, to help us to establish, exercise or defend legal claims; and
- to comply with legal and/or regulatory requirements.

Relationship Management

- We may use your personal data to contact you to offer you additional services, keep you up to date with business development and market insights or to invite you to events that may be of interest (except where you have asked us not to).
- You have the right to opt out of receiving such communications from us by either liaising with your Jefferies contact or by electronically unsubscribing from emails we have sent you. After you unsubscribe we will not send you such communication emails but may continue to contact you to the extent necessary for the purposes of any services we are providing to you or as may be needed for regulatory purposes.

4.2 *Supplier data*

We will use your information:

- To store (and update when necessary) your details on our database, so that we can contact you in relation to our agreements or our dealings with you;
- To obtain support and services from you;
- To perform certain legal and regulatory obligations, such as carrying out anti-money laundering and verification/background checks;
- Facilitating our invoicing processes; and
- In more unusual circumstances, to help us to establish, exercise or defend legal claims.

4.3 *Our legal basis for processing your personal data*

We will rely on one of the following legal basis:

- Necessary for performance of the contract or to take steps preparatory to such contract;
- Legal obligations for compliance with legal and regulatory obligations that we are subject to; or
- Legitimate interests pursued by us or a third party to the extent such interests are not overridden by your interests or fundamental rights and freedoms.

Alternatively, in certain limited circumstances we may be required to obtain your consent to the processing of your personal data in which case you will be asked to expressly consent.

5. **Who do we share your personal data with?**

Where appropriate and in accordance with local laws and requirements, we may share your personal data, in various ways and for various reasons, with the following categories of people:

- Affiliates within the Jefferies Group;
- Tax, audit, regulatory bodies or other authorities, when we believe in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority, in connection with any anticipated litigation or in compliance with our legal and regulatory obligations);
- Third party service providers who perform functions on our behalf (including, without limitation, administrators, external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems, etc.);
- Third party outsourced IT and document storage providers (including cloud based storage providers) where we have an appropriate processing agreement (or similar protections) in place; and
- If Jefferies is subject to a bid, or otherwise merges with or is acquired by another business or company in the future, we may share your personal data with the new (or prospective) owners of the business or company.

To ensure that your personal information receives an adequate level of protection, we put in place appropriate procedures with the third parties we share your personal data with to ensure that your personal information is treated by those third parties in a way that is consistent with, and which respects, the law and regulation on data protection.

6. How do we safeguard your personal data?

We are committed to taking all reasonable and appropriate steps to protect the personal information that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures. These include measures to deal with any suspected data breach and training for staff on handling personal data.

Please note you are responsible for ensuring that any personal data that you send to us is sent securely (e.g. encrypting attachments).

7. How long do we keep your personal data for?

We will ordinarily process your data throughout the course of our interactions and will then generally retain it for an appropriate amount of time after we have parted ways. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. There may also be some legal, regulatory or risk-management requirements to retain data, including where certain data might be relevant to any potential litigation (bearing in mind relevant limitation periods).

Once we have determined that we no longer need to hold your personal data, we will undertake one or more of the following: delete it from our systems and destroy hard copies, archive the personal data so it is beyond use or anonymise/mask the relevant personal data.

8. How can you access, amend or take back personal data you have provided to us?

Subject to applicable law, you may have various rights in respect of the processing of your data, as listed below.

- *Access:* You may ask us to confirm, and provide copies of, the information we hold about you at any time, and request us to modify, update or delete such information.
- *Erasure:* You have the right to request that we erase your personal data in certain circumstances.
- *Restrict Processing:* You have the right to request that we restrict our processing of your personal data in certain circumstances.
- *Rectification:* You also have the right to request that we rectify any inaccurate or incomplete personal data that we process or control.
- *Data Portability:* If you wish, you have the right to transfer your personal data between data controllers. To allow you to do so, we will provide you with your data in a commonly used machine-readable format that is password-protected so that you can transfer the data.
- *Object:* This right enables you to object to us processing your personal data where we do so for one of the following reasons: (i) our legitimate interests; or (ii) to send you relationship management materials for additional products or services.
- *Withdraw Consent:* Where we have obtained your consent to process your personal data for certain activities (for example, for certain relationship management arrangements or any automatic profiling), you may withdraw this consent at any time.

If you would like to exercise any of these rights, including withdrawing your consent to the processing of your personal data (where consent is our legal basis for processing your personal data), details of how to contact us can be found in Section 11. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

In accordance with data protection laws you also have the right to lodge a complaint with the UK regulator for data protection, the Information Commissioner. The contact details for doing so are: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the period for which we hold your data.

9. How do we store and transfer your data internationally?

In undertaking services for you, your personal data may be transferred to those set out in Section 5.

We want to make sure that your data is stored and transferred in a way which is secure. We will therefore only transfer data outside of the European Economic Area (i.e. the Member States of the European Union, together with Norway, Iceland and Liechtenstein) where such transfer is compliant with data protection legislation and the means of transfer provides adequate safeguards in relation to your data, for example:

- by way of data transfer agreement, incorporating the current standard contractual clauses adopted by the European Commission for the transfer of personal data by data controllers in the EEA to data controllers and processors in jurisdictions without adequate data protection laws; or
- transferring your data to a country where there has been a finding of adequacy by the European Commission in respect of that country's levels of data protection; or
- in the case of transfer to the United States, the transfer is made to an entity certified under the EU – US Privacy Shield; or
- where you have consented to the data transfer or other valid transfer basis.

10. Cookies

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings.

We may use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns that emerge individually or from larger groups. This helps us to develop and improve our website and services in response to what our visitors want and need.

11. Jefferies contact details

If you have any comments, questions or concerns about any of the information in this Privacy Notice, or any other issues relating to the processing of personal data by Jefferies International Limited and/or Jefferies GmbH, please contact our Jefferies European Privacy Office by email or post:

EmeaAsiaprivacy@jefferies.com

Jefferies European Privacy Office

Jefferies International Limited, Vintners Place, 68 Upper Thames Street, London EC4V 3BJ, UK
Jefferies GmbH, Bockenheimer Landstraße 24, 60323 Frankfurt am Main, Germany