

Singer Capital Markets - Privacy Notice

Purpose

This Privacy Notice sets out the types of personal information Singer Capital Markets Limited and its subsidiaries (“**Singer Capital Markets**”, “**we**”, “**us**”, “**our**”) 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 Privacy Notice applies 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.

Singer Capital Markets is the data controller responsible for the personal data that you provide us.

What are your Data Rights?

Under UK data protection law, every individual has the following rights in relation to the personal data we hold about you:

- ✦ **the right of access** – the right to request access to your personal data and information about how we process it;
- ✦ **the right to rectification** – if the personal data we hold about you is inaccurate or incomplete, you are entitled to have it corrected;
- ✦ **the right to erasure** – you may request that we delete or remove your personal data in some circumstances, such as where we no longer need it or if you withdraw your consent for us to process it (where you are entitled to do so);
- ✦ **the right to restrict or object to processing** – you may object to, or request the restriction of, our processing of your personal data;
- ✦ **the right to data portability** – in certain circumstances, you may request that we send you your personal data such that you may re-use it elsewhere, or that we transfer it to a third party on your behalf;
- ✦ **the right not to be subject to automated decision-making and profiling** – you have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect – or similarly significantly affects you – unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

Please note these rights may be superseded in some cases. For example, as a regulated firm we have a legal obligation to retain records of clients and trades. This legal obligation could mean that even if we are asked by a client to erase or restrict their personal data, we may not be able to legally do so. We may also not be able to provide all personal data held if doing so would contravene the personal data rights of a third party. Each request will be dealt with on a case by case basis.

If you want to exercise any of the above rights, please contact us at compliance@singercm.com

What Personal Data We Collect About You?

Personal information is information that can be used to identify you or that is about you. The following is a non-exhaustive list of the personal information collected and processed as part of our business:

- ❖ **Identity and Contact Data**, including your name, address, telephone number, job title, date of birth, email address, passport number, nationality, employment history, educational or professional background, bank account details, tax status, any KYC information that we may collect and other personal data that you may provide when you register an account with us or required by us to perform our services to our clients and its employees/officers or maintain our client relationship management system;
- ❖ **Business Information**, including information provided in the course of the contractual or client relationship between you and Singer Capital Markets (including written and recorded telephone communications), or otherwise voluntarily provided by you or your employees/officers;
- ❖ **Profile and Usage Data**, including your preferences in receiving marketing information from us, your communication preferences and information about how you use and interact with our website;
- ❖ **Technical Data**, including information collected during your visit to our website; and
- ❖ **Physical Access Data**, relating to details of your visits to our premises.

Basis for Processing Your Personal Data

In order to legally process personal data we need to rely on one or more of the following legal grounds:

- ❖ **Consent**: you have given clear consent for us to process your personal data for a specific purpose.
- ❖ **Performance of a Contract**: the processing is necessary to perform our obligations or exercise our rights pursuant to and in accordance with any contract you have with us, or because specific steps need to be taken before entering into a contract with you.
- ❖ **Compliance with law or regulation**: the processing is necessary for us to comply with applicable law or regulation, including for example:
 - ❖ to comply with our 'Know Your Client', anti-money laundering, anti-bribery and other similar legal obligations; or
 - ❖ to record any trades and transactions with you;
 - ❖ to make any necessary corporate filings.

- ✦ **Legitimate interests:** we may process personal data for our legitimate interests or the legitimate interests of a third party (including our clients) unless there is a good reason to protect your personal data which overrides those legitimate interests.

If we have obtained your consent to process your personal data, you have the right to withdraw that consent, at which point we will no longer be able to process your personal data if that is the only condition which we are relying upon to justify the processing.

Please note, however, that in cases where we have a legal obligation, we may need to continue to process your data regardless of consent.

What We Use Your Personal Data For?

We may collect, process, maintain and store personal data from, and about, you:

- ✦ to verify your identity and to comply with regulatory obligations and policies relating to anti-money laundering and terrorist financing checks, anti-bribery, prevention of fraud and 'Know Your Client' requirements;
- ✦ to fulfil the supply of services and managing and administering our relationships with our clients and their personnel, including to maintain our client relationship management system and to keep a record of our how services are being used;
- ✦ 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 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, invitations to events, providing feedback and to administer and manage our website, systems and applications;
- ✦ to manage access to our premises and for security purposes;
- ✦ to comply with applicable laws, court orders, other judicial processes, the requirements of any relevant regulator or our risk management obligations;
- ✦ 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 services, and to provide you with communications about our performance and press releases; 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.

We may use your personal data for any other purpose if and to the extent that is required or permitted by applicable law.

Information about other people

If you provide us with personal data about any person other than yourself (e.g. any employees/offices who work in your organisation), you shall ensure that you have provided all necessary information to the relevant individuals (known as "data subjects") about our use of personal data. You may refer data subjects to this Privacy Notice.

Disclosure of your Personal Data

We will only share personal data with third parties pursuant to contractual arrangements or legal/regulatory obligations we have with or owe to them. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security policies.

We have set out below some of the third parties with whom we may share your personal information:

- ❖ to companies providing services for money laundering and terrorist financing checks and other fraud and crime prevention purposes and companies providing similar services;
- ❖ third party systems providers - we use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The services powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them;
- ❖ to courts, law enforcement authorities, regulators, governmental officials and other regulatory or supervisory bodies;
- ❖ our auditors, lawyers, accountants and other professional advisers;
- ❖ third parties involved with the services we provide to clients, such as counterparties and their professional advisers and intermediaries, and courts, tribunals, public registrars and stock exchanges;
- ❖ third parties that assist us in our marketing activities and/or organising events or seminars.

Transfers Outside of the EEA or UK

Where necessary, in order to deliver our services, we will transfer personal data to countries outside the European Economic Area or the United Kingdom. When doing so, we will comply with our legal and regulatory obligations in relation to the personal information, including, but without limitation, having a lawful basis for transferring personal information and ensuring, where required, that there

are appropriate safeguards in place for the protection of the personal information so transferred.

Data Retention

Singer Capital Markets retains personal data for so long as it is required as dictated by a range of factors. To determine the appropriate retention period for personal data, we consider our contractual and business relationship with you and the purpose for which we hold your personal data, our legal and regulatory obligations to retain data for a certain period of time, potential disputes and the time limit for potential claims and guidelines issued by our regulators.

After the relevant period has expired, we may destroy such files without further notice or liability.

Security of Personal Information

Singer Capital Markets is committed to keeping your personal data safe and secure. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security. Our IT department utilises advanced software to keep out external threats.

All of our employees and workers who have access to, and are associated with the processing of personal information, receives training on data protection legislation and are obliged to respect the confidentiality of, and comply with the policies that protect, personal information.

Complaints or Queries

Should you wish to exercise any of your data protection rights or are unhappy with how we have handled your information, please email compliance@singercm.com setting out your concerns/request. This email address is monitored by our Head of Compliance.

If you are not satisfied with our response to your complaint or believe our processing of your personal information does not comply with law, you also have the right to complain directly to the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

Changes to this Privacy Notice

From time to time, we may update this Privacy Notice to reflect any changes to our use of your personal information or as required to comply with changes in applicable law or regulatory requirements and a revised version of this Privacy Notice will be made available on our website (<https://www.singercm.com/legal-regulatory/>). We encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.

This Privacy Notice was reviewed and updated on 8 February 2022.

Cookie Policy

What are cookies?

Cookies are small text files containing small amounts of information which are placed onto your device such as your computer, smartphone or other electronic device when you visit a website, provided your browser settings allow it. Many cookies are necessary to enable core functionality of websites to work. Cookies are widely used by websites to enable them to function properly and to improve the user experience.

How do we use Cookies?

Our website places and accesses cookies on your device. We may use the following cookies on our website:

- 1. Essential Cookies:** these are essential in order to enable you to move around a website and use its features, such as accessing secure areas of the website. Without these cookies, certain services you may have asked for cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.
- 2. Performance cookies:** these collect information about how visitors use a website, for instance which pages visitors go to most often, and if they get error messages from web pages. These cookies do not collect information that identifies a visitor. All information these cookies collect is anonymous and is only used to improve how a website works.
- 3. Functionality cookies:** these allow a website to remember choices you make (such as your username, language or the region you are in) and provide enhanced features. These cookies can also be used to remember changes you have made to text size, font and other parts of web pages that you can customise. They may also be used to provide services you have requested, such as watching a video. The information these cookies collect may not always be anonymous, but these cookies are not able to track your browsing activity on other websites.

By using our website, you agree that we can place these types of cookies from us and third parties on your device.

Amending cookie preferences

If you wish to remove or block cookies set by our website from your browser, you can delete them. The instructions for removing cookies from your computer or mobile device will depend on the operating system and web browser you use. Please note, however, that withdrawing your agreement to the use of cookies on our website could impair its functionality.

For more information about cookies and how to disable them, please visit www.allaboutcookies.org or www.youronlinechoices.eu. The Information Commissioner's Office also provides information at ico.org.uk/your-data-matters/online/cookies/.



Singer
Capital Markets

Head office

1 Bartholomew Lane,
London EC2N 2AX

Main Reception: +44 (0)20 7496 3000

Compliance: +44 (0)20 7496 3093