

Singer Capital Markets – Privacy Notice

Purpose

This Privacy Notice sets out the types of personal information Singer Capital Markets Securities Limited and Singer Capital Markets Advisory LLP (together, "**Singer Capital Markets**", "**we**", "**us**", "**our**") collect from you, 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, clients and potential clients (and individuals connected with our clients and potential clients), contacts at firms we deal with in a non-client capacity, suppliers, and visitors to our offices. The Privacy Notice applies to personal data provided directly to us by individuals and corporate entities as well as personal data obtained from third parties.

We are committed to the protection of personal data and to fair and transparent processing in accordance with applicable data protection and privacy legislation, including to the extent applicable, the Data Protection Act 2018, the General Data Protection Regulation ("**GDPR**"), and the GDPR as it forms part of the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 (in each case as amended, supplemented or replaced from time to time) ("**Data Protection Legislation**").

About Singer Capital Markets

Singer Capital Markets Securities Limited is incorporated in England & Wales under registration number 05792780 and is authorised and regulated in the UK by the Financial Conduct Authority ("**FCA**") with Firm Reference Number 453676. Singer Capital Markets Advisory LLP is registered in England & Wales under registration number OC364131 and is authorised and regulated in the UK by the FCA with Firm Reference Number 568323. Our registered office is One Bartholomew Lane, London EC2N 2AX

Singer Capital Markets is the data controller responsible for the personal data that you provide us. However, in certain circumstances, we may process personal data on behalf of our client as a data processor for the purposes of Data Protection Legislation.

What are your Data Rights?

In accordance with Data Protection Legislation, every individual has the following rights in relation to the personal data we hold about you:

- ✦ **the right to be informed** – the right to be informed about the collection and use of your personal data. This Privacy Notice sets out the purpose for processing your personal data, the retention period for that data and who it will be shared with;
- ✦ **the right of access** – the right to request access to, and a copy of, 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 certain circumstances, such as where we no longer need it or if you exercise your right to withdraw consent;
- ✦ **the right to restrict or object to processing** – you have the right to object to, or request the restriction of, our processing of your personal data. Where we process your personal data based on your consent, you have the right to withdraw the consent at any time by contacting our Compliance Department;
- ✦ **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 concerning you or similarly significantly affects you. We do not make any decisions based solely on automated processing.

Please note these rights are not absolute and 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 wish to exercise any of your data protection rights, please contact us at compliance@singercm.com.

What Personal Data We Collect About You?

Personal data is information that can be used to personally identify you. We collect and process different types of personal data, depending on the nature of our relationship with you. The following is a non-exhaustive list of the personal data we may collect and process about you:

- ✦ **Identity and Contact Data**, including your name, gender, address, telephone number, job title, date of birth, email address, passport number, nationality, employment history, educational or professional background, tax status, and any other 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 or maintain our client relationship management system;
- ✦ **Business Information**, including information provided in the course of the contractual or client relationship between you (or the organisation which you are affiliated with) and Singer Capital Markets or otherwise voluntarily provided by you (or the organisation which you are affiliated with);

- ✦ **Financial Data**, including bank account details or any other payment and billing data;
- ✦ **Services Data**, including written communications with you (via post or electronic communication) and recordings of telephone communications and other meetings with you (including video and audio recordings);
- ✦ **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/or obtained from our IT and communications monitoring; and
- ✦ **Physical Access Data**, relating to details of your visits to our offices.

Certain personal data we collect is treated as a **special category of personal data** to which additional protections apply under Data Protection Legislation. This includes personal data revealing a person's racial or ethnic origin, religious or philosophical beliefs, or data concerning health or details relating to criminal convictions and offences (including the alleged commission of offences). We do not generally seek to collect special category personal data, but this may be collected if you provide it to us or where necessary in the context of us providing our services.

What We Use Your Personal Data For?

We may use your personal data for the following purposes:

- ✦ to perform our obligations under our contract with you (or the organisation which you are affiliated with), including to maintain our client relationship management system and to keep a record of our how services are being used;
- ✦ 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 ongoing 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 monitor and record calls and meetings 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 offices and for security purposes;
- ✦ to provide you with marketing information about our products and services that may be of interest to you as well as informing you of any changes to our services;
- ✦ to protect the security of our communications and other systems and to prevent and detect security threats, frauds or other criminal or malicious activities; 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.

Basis for Processing Your Personal Data

When processing your personal data for any of the purposes listed above, we need to rely on one or more of the following grounds in compliance with Data Protection Legislation:

- ✦ **Consent:** you have explicitly agreed 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 we have with you (or the organisation which you are affiliated with), or because specific steps need to be taken before entering into such contract.
- ✦ **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:** the processing is necessary for the purposes of legitimate interests pursued by us or by a third party (including our clients) unless there is a good reason to protect your personal data which overrides those legitimate interests. We may seek to rely on this ground for processing personal data (i) to prevent fraud, (ii) to protect our business interests, (iii) to ensure that our matters and services are well managed, (iv) to evaluate, develop or improve our services and/or (v) to keep our clients informed about relevant services.

In relation to any processing of special category data, we will generally rely on obtaining specific consent in order to process such information, although it may be necessary for us to use certain

information in order to comply with our legal obligations as a regulated entity (such as in relation to an alleged offence). Where you have consented to our processing of such information (including special categories of personal data) you may withdraw such consent at any time, by contacting us using the contact details set out below. However, please note that in certain circumstances it may be still lawful for us to continue processing this information even where consent has been withdrawn, if one of the other legal bases described above is applicable.

Information about other people

Where you provide personal data relating to your directors, shareholders, beneficial owners, employees, agents, associates or family members you confirm that you are authorised to provide this personal data to us and you shall ensure that you have provided all necessary information to the relevant individuals about our use of personal data.

Disclosure of your Personal Data

We may disclose and share your personal data as follows:

- ✦ to companies providing services for money laundering and terrorist financing checks and other fraud and crime prevention purposes and companies providing similar services;
- ✦ to third party data processors and systems providers where they support or provide services to us, including marketing, IT and compliance support services such as website hosts, data storage/back up services, disaster recovery, monitoring for prevention of market abuse. Our third party processors and service providers are subject to security and confidentiality obligations and are only permitted to process your personal data for specified purposes and in accordance with our instructions;
- ✦ to courts, law enforcement authorities, regulators, governmental officials and other regulatory or supervisory bodies as required by law or as requested;
- ✦ to our affiliated companies and to third parties involved with the services we provide to clients, such as counterparties and their professional advisers and intermediaries, and courts, tribunals, registrars and stock exchanges;
- ✦ to our and our affiliated companies' auditors, accountants, legal advisors and other professional advisors;
- ✦ to third parties that assist us in our marketing communications and/or organising events or seminars;
- ✦ 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.

Transfers Outside of the EEA or United Kingdom

In order to deliver our services, it is sometimes necessary for us to transfer and store your personal data outside the UK or the European Economic Area ("EEA"), such as (i) if our service providers are located outside the UK or the EEA, (ii) if you are based outside the UK or the EEA or (iii) where there is an international aspect to the services which we have been instructed on.

Where personal data is transferred to and stored outside the UK or the EEA, we take steps to provide appropriate safeguards to protect your personal data, including:

- ✦ transferring your personal data to a country which the UK Government has determined ensures an adequate level of protection, as permitted under Data Protection Legislation;
- ✦ entering into standard contractual clauses approved by the UK Government, obliging recipients to protect your personal data as permitted under applicable Data Protection Legislation; or
- ✦ if we cannot or choose not to rely on either of those mechanisms at any time, we will not transfer your personal data outside the UK or the EEA unless we can do so on the basis of an alternative mechanism or exception provided by applicable Data Protection Legislation.

Marketing

Singer Capital Markets may use your personal data from time to time to inform you by email or other electronic means about our products and services (including those of third parties) which may be of interest to you.

You have the right to request that we cease or stop marketing communications by contacting our Compliance Department or clicking "unsubscribe" for the relevant communication.

Data Retention

Your personal data will not be kept for longer than is necessary for the purposes for which it was collected, including for the purposes of satisfying any legal or regulatory requirements and, where required for Singer Capital Markets to assert or defend against legal claims, until the end of the relevant retention period.

To determine the appropriate retention period for personal data, we consider (i) the amount, nature, and sensitivity of the personal data, (ii) the potential risk of harm from unauthorised use or disclosure of your personal data, (iii) the purposes for which we process your personal data (iv) whether we can achieve those purposes through other means, and (v) the applicable legal, regulatory and other requirements.

Security of Personal Data

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 information security.

Where data processing is carried out on our behalf by a third party, we endeavour to ensure that appropriate security measures are in place to prevent unauthorised disclosure of personal data.

Despite these precautions, however, Singer Capital Markets cannot guarantee the security of personal data transmitted over the internet or that unauthorised persons will not obtain access to personal data. We have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Complaints or Queries

If you have any queries about this Privacy Notice or if you wish to make a complaint about how we process your personal data, please email compliance@singercm.com. This email address is monitored by our General Counsel and Chief Compliance Officer.

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

We reserve the right to update and amend this Privacy Notice from time to time to reflect any changes to our use of your personal information or as required to comply with changes in applicable law or regulatory requirements. Any changes we make to this Privacy Notice in the future will be made available on our website (<https://www.singercm.com/legal-regulatory/>). You should review this Privacy Notice periodically to be informed of how we use your personal information.

This Privacy Notice was updated on 28 August 2025



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