

Singer Capital Markets Privacy Notice

Singer Capital Markets Ltd and its subsidiaries ("**Singer Capital Markets**") may use personal data to provide services requested from us, manage accounts, make decisions, detect and prevent financial crime, for analysis and assessment, and to ensure that we comply with applicable legal and regulatory requirements. We do not pass your personal data to external marketers and would not do so without your explicit permission.

What is Personal Data?

Under the General Data Protection Regulation, personal data is defined as:

"Any information relating to an identified or identifiable natural person."

A further level of personal data is Sensitive, or 'special category' personal data. The following data falls within this definition:

- ✦ racial or ethnic origin
- ✦ political opinions
- ✦ religious or philosophical beliefs
- ✦ trade union membership
- ✦ genetic data
- ✦ biometric data
- ✦ data concerning health
- ✦ data concerning a natural person's sex life or sexual orientation.

Outside of the HR department, Singer Capital Markets records and retains very little data that would constitute 'sensitive personal data' as it largely has very little relevance to what we do as a business.

Your Data Rights?

Under the General Data Protection Regulation every individual has the following rights:

- ✦ the right to be informed; i.e. what data is being gathered and how it is being used and stored
- ✦ the right of access; i.e. the right to see what personal data any company has relating to you
- ✦ the right to rectification; e.g. ensuring data are accurate and up to date, and corrected if not
- ✦ the right to erasure; often referred to as 'the right to be forgotten' – erasure of all data at your request
- ✦ the right to restrict processing; i.e. to limit data usage

- ✦ the right to data portability; i.e. for your data to be sent to another company on your behalf, at your request
- ✦ the right to object i.e. the right to object to us processing your data
- ✦ the right not to be subject to automated decision-making including profiling. Singer Capital Markets does not use any automated decision making processes.

Please note these rights may be superseded in some cases.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.

Basis for Processing Your Data

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

- a) Consent: you have given clear consent for us to process your personal data for a specific purpose.
- b) Contract: the processing is necessary for a contract you have with us, or because specific steps need to be taken before entering into a contract with you.
- c) Legal obligation: the processing is necessary for us to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party 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 data, you have the right to withdraw that consent, at which point we will no longer be able to process your 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.

Similarly, if you choose not to consent to our processing of personal data it may be the case that we would no longer be able to fulfil our contractual obligations and would have to effectively end our relationship – for example if a prospective employee declined to allow their data to be sent to a third party payroll provider, then we would not be able to make salary payments.

Clients

Singer Capital Markets has legal obligations under the Money Laundering and Terrorist Financing (Amendment) Regulations 2019 and Money Laundering, Terrorist Financing and Transfer of Funds (Information on the Payer) Regulations 2017, to identify and verify its customers and perform ongoing monitoring on customer data. As part of customer identification (“KYC”) procedures Singer Capital Markets collects personal information (and in some cases sensitive personal information), such as phone numbers, e-mail addresses and financial details, along with identification information such as date of birth, residential address and nationality.

Singer Capital Markets may also hold personal information (including sensitive personal information) obtained through publicly available sources such as credit agencies, media publications and company registries.

In the interests of fraud prevention and the prevention of financial crime(s) your customer identification data will be shared with third parties who perform monitoring services on behalf of Singer Capital Markets; these third parties are required to adhere to the same high privacy standards as Singer Capital Markets.

Your personal data will only be shared in accordance with data protection laws where deemed necessary and where third parties are providing services to Singer Capital Markets as part of our ongoing services and in order to satisfy our legal and regulatory obligations and/or provision of our ongoing services to clients. We will not, without your consent, transfer any of your personal data outside of the UK.

Data Retention

Singer Capital Markets retains personal data for set periods of time as dictated by company policy and regulatory requirements. Different documentation is subject to different data retention obligations. For example, the HR department’s data is commonly governed by employment law, while the compliance department commonly pays particular attention the money laundering regulations. These documents may contain personal data – most commonly in the form of names and email addresses. Once data has reached the end of its retention schedule it is safely destroyed.

Security

Singer Capital Markets is committed to keeping your personal data safe and secure. Our IT department utilises advanced software to keep out external threats. Every employee has received training on GDPR, the importance of people’s personal data, and the importance of records management and archiving.

Data is controlled by department on a ‘need to know’ principle, with access controls limited to those employees who require it for a purpose.

Cookies

We use “cookies” and other types of tracking software in order to personalise your visit to our Website, customise our pages for you and enhance your experience by gaining a better understanding of your particular interests. A cookie is a message given to a web browser by a web server, which is then stored by the browser in a text file. Each time the browser requests a page from the server this message is sent back which enables the user to be identified.

We may use the information provided by cookies to recognise and track which parts of our Website you visit when you are using our Website, analyse trends and general usage patterns, optimise our site, administer the site, or for research and marketing purposes to help us better serve you. No information which personally identifies you will be collected through the cookies.

If you wish, you can set your browser to notify you before you receive a cookie so you have the chance to accept it and you can also set your browser to refuse to receive or send all cookies. You can also block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, please be aware that certain features of our site require the use of cookies in order to work effectively and if you do not accept cookies these features may not function correctly or at all.

If you register with us or continue to use our site, you agree to our use of cookies.

Complaints or queries

Should you wish to exercise any of your data protection rights, please email compliance@singercm.com setting out your concerns/request. This email address is monitored by our Head of Compliance.

You have the right to complain directly to the Information Commissioner’s Office (ICO) who regulate our use of data. We would hope to work with you to resolve any issues prior to this step.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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