

Document title: **PrimaryBid - UK - Combined Customer and Website Privacy Notice**

PrimaryBid Limited, its subsidiaries and affiliates ("**PrimaryBid**", "**we**", "**our**" or "**us**") respect the privacy of the individuals whose personal data we collect ("**you**" or "**your**").

This privacy notice (the "**Privacy Notice**") provides information, for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as it forms part of domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 ("**UK GDPR**"), the UK Data Protection Act 2018 ("**DPA**") and other applicable national data protection laws, concerning how PrimaryBid processes and protects your personal data that we may receive as part of your registering and interactions with PrimaryBid.

The terms "**controller**", "**processor**", "**data subject**", "**personal data**", "**process**", "**processes**", and "**processing**" used in this Privacy Notice have the meanings given to them in the UK GDPR.

Controllership

PrimaryBid is an independent 'controller' in respect of its processing of your personal data. We are responsible for ensuring that we hold and use your personal data in compliance with the UK GDPR and the DPA and other applicable national data protection laws.

The personal data that we collect about you

If you are a visitor to primarybid.com or a user of our app:

We collect a certain amount of personal data about you, which may include your name, email address, telephone number information you provide us in the Contact Us form and whether you have a stockbroking account.

We do not collect or process any special categories of personal data (such as 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), nor do we collect any information about criminal convictions and offences.

If you have a contractual relationship with PrimaryBid Limited:

We may receive a certain amount of personal data about you, either directly or from your broker, which may include your name, date of birth, nationality, your gender, email address, telephone number, postal address, your National Insurance number or other information contained in identity-related documentation (such as passport, driving license, or birth certificate), debit card information, technical information such as IP addresses and the technology you use, usage information, open data and public records information and your broker information (including account number).

Other than for purposes of financial services compliance (such as AML/KYC checks, PEP checks and sanctions screening), we do not collect or process any special categories of personal data (such as 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 personal data relating to criminal convictions and offences.

The purpose for processing your personal data

We may process your personal data for the purposes of providing you with access to public offerings, the PrimaryBid platform and related services. We may also process your personal data to:

If you are a visitor to primarybid.com, a user of our app or you have a contractual relationship with PrimaryBid Limited:

- communicate with you and respond to your enquiries, including responding to complaints and attempting to resolve them;
- send you promotional and marketing materials, newsletters or other related communications (including making suggestions and recommendations to you about services that may be of interest to you);
- conduct research and analysis to improve the quality of our marketing and the experience of and relationships with our customers;
- communicate with you about operational changes to our products, services and website: for example, if we were to withdraw one of our products, or change this privacy policy;
- comply with our legal and regulatory obligations (including verifying your identity and conduct identity and background checks for anti-money laundering, fraud, credit and security purposes) and to exercise our legal rights;
- administer auditing, billing and reconciliation activities and other internal and payment-related functions;
- administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- detect, investigate, report, and seek to prevent financial crime and to manage risk for us and our customers;
- develop, manage and improve our products, services and the website (including conducting research and analysis) and to test new products, services, and features of the website;
- run our business in an efficient and proper way, including in respect of our financial position, business capability, corporate governance, audit, strategic planning and communications;
- monitor and/or record your communications with us for quality control, training, security and regulatory purposes;
- carry out segmentation of our customer database, along with propensity modelling (a customer insight technique which involves analysing past observations to predict future customer behaviour) and create event triggers for specific categories of customer for marketing and servicing purposes; and
- exercise our rights in agreements and contracts to which we are a party.

If you have a contractual relationship with PrimaryBid Limited:

- transfer information to the Official Receiver or appointed insolvency practitioner(s) for the administration of your account, if we receive notice of or are informed of your insolvency, bankruptcy, or of any insolvency proceedings/arrangements;
- enforce or obtain settlement of debts owed to us or in relation to investments made on your behalf, including sharing your information with any debt collection, debt tracing or other agent for these purposes;
- where you have requested to take part in a PrimaryBid offer, or hold any investment, provide such information relating to your request as may be reasonably requested by the issuer of that investment, or any managers acting on their behalf, in connection with the offer or issue of that investment; and
- make national declarations which we have to provide to CREST for onward transmission to the registrar.

What is the legal basis of the processing?

When we process your personal data, we may rely on:

If you are a visitor to primarybid.com, a user of our app or you have a contractual relationship with PrimaryBid Limited:

- Article 6(1)(b) UK GDPR to the extent such processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into any such contract. Examples of this might include subscribing to public offerings and your use of the PrimaryBid platform; and
- Article 6(1)(f) UK GDPR to the extent such processing is necessary for the purposes of the legitimate interests we pursue to the extent we have concluded that our processing is not overridden by yours interests or fundamental rights or freedoms that require the protection of personal data. Examples of this might include any marketing or advertising and processing for the purposes of compliance with our internal policies and procedures.

If you have a contractual relationship with PrimaryBid Limited:

- Article 6(1)(c) UK GDPR to the extent processing is necessary for compliance with a legal obligation to which PrimaryBid is subject. Examples of this might include obligations relating to anti-money laundering, Know Your Customer, suspicious activity reports, fraud prevention, sanctions, politically exposed persons and terrorist financing;
- Article 9(2)(g) UK GDPR and Paragraph 10, Part 2 of Schedule 1 to the DPA to the extent such processing is necessary for preventing or detecting unlawful acts. Where we rely on this lawful basis of processing, we will have in place an Appropriate Policy Document as required pursuant to Paragraph 5, Part 2 of Schedule 1 to the DPA; and
- Article 10 UK GDPR and Paragraph 10, Part 2 of Schedule 1 to the DPA to the extent such processing is necessary for preventing or detecting unlawful acts. Where we rely on this lawful

basis of processing we will have in place an Appropriate Policy Document as required pursuant to Paragraph 5, Part 2 of Schedule 1 to the DPA.

Who will your personal data be shared with? / Who are the recipients of your personal data?

If you are a visitor to primarybid.com, a user of our app, or you have a contractual relationship with PrimaryBid Limited:

We may share your personal data with any third parties that help us provide services, with legal or other professional advisors and with regulators, prosecutors and law enforcement authorities which regulate us. We may also share your personal data with our affiliates in order to provide these services.

Any such transfers will be in compliance with our obligations as a controller under the UK GDPR, the DPA and other applicable national data protection laws. Some of these persons may process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data.

The disclosures described in this Privacy Notice may involve transferring your personal data to countries outside the UK and EEA which may not have similarly strict data privacy laws. When this occurs, we will ensure that any such transfers are carried out in compliance with applicable law, including, where necessary, being governed by data transfer agreements designed to ensure that your personal data is protected, on terms approved for this purpose by the UK or EU.

We will never sell your personal data and in all cases, PrimaryBid will ensure that your personal data is only disclosed for the purposes set out above and in compliance with applicable data protection laws.

If you have a contractual relationship with PrimaryBid Limited:

We may share your personal data with your broker, with other financial institutions involved in the public offerings, with any third parties that help us provide services, with legal or other professional advisors and with regulators, prosecutors and law enforcement authorities which regulate us.

We may also share your personal data with issuers in relation to offerings in which you subscribe and our affiliates in order to provide these services.

Retention and deletion of your personal data

We intend to keep your personal data accurate and up to date and, as a general principle, we do not retain your personal data for longer than we need it. We will delete or anonymise any information that we hold about you when it is no longer required for the purposes set out above, or where longer, such period as is required or permitted by law or regulatory obligations which apply to us. Specific information about our record retention policies is available on request. Please contact us (see below).

Automated decision-making techniques (including profiling)

If you are a visitor to primarybid.com or a user of our app:

We do not envisage your personal data will undergo any automated decision making.

If you have a contractual relationship with PrimaryBid Limited:

We may engage in automated decision making relating to the allocation of shares in an offering. The criteria used for determining allocation is described in the legal documents provided by an issuer in relation to an offering.

Your rights in relation to your personal data

The GDPR and other applicable laws provide you (as the data subject) a number of absolute or qualified legal rights in relation to the processing of your personal data. These rights include:

- the right to know what personal data we process and a right of access to such personal data;
- the right to request any incomplete or inaccurate personal data to be corrected;
- the right to object to our processing of your personal data;
- the right to require us to delete your personal data in some limited circumstances;
- the right to object to our processing of some or all of your personal data on grounds relating to your particular situation which are based on legitimate interests, at any time (and require such personal data to be deleted). If you object, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal claims; and
- a "data portability" right to require us to transfer your personal data to you or to a new service provider in a structured, commonly used and machine-readable format.

If you wish to exercise any of the rights referred to above, please contact us using the details set out under "**Contacting Us**" below.

We review and verify data protection rights requests. We apply non-discriminatory principles when we action requests relating to your data, in accordance with applicable data protection laws and principles.

We exercise particular care when receiving a request to exercise these rights on your behalf by a third party. We will ensure that the third party is correctly authorised by you to receive the requested information on your behalf.

If you wish to exercise any of these rights, please contact us (see **Contacting Us** below). You can also lodge a complaint about our processing of your personal information with the office of the UK Information Commissioner (<http://www.ico.gov.uk>).

When exercising any of these rights, we may request specific information from you to prove your identity to our satisfaction so that we can safeguard your personal data from unauthorised access by someone impersonating you. Please note that due to the pseudonymised nature of the personal data we receive about you, it may not be possible for us to identify your personal data in the dataset in order to comply with your request.

Contacting Us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data, or to exercise of any of the rights listed above, please address questions, comments and requests to our Data Protection Officer at privacy@primarybid.com

Changes to this policy

Any changes we make to this Privacy Notice in the future will be posted to our website at <https://primarybid.com/home/>

This Privacy Notice was last updated on 30th September 2021