

About this Privacy Notice

This Privacy Notice, together with any other documents referred to in it, explains how Stifel Nicolaus Europe Limited (“**Stifel**,” “**we**,” “**us**,” or “**our**”) may collect, use, and/or disclose certain types of personal data in connection with services we may provide you in the course of operating our business and certain rights and options that you have in this respect.

This Privacy Notice is addressed to individuals outside of our organisation with whom we interact, including visitors to our website, clients and prospective 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.

Who is responsible for your personal data?

For the purposes of data protection law, Stifel is the data controller and responsible for your personal data.

Stifel is incorporated in England and Wales (No. 03719559) with its registered address at 4th Floor, 150 Cheapside, London, EC2V 6ET. Stifel is authorised and regulated in the United Kingdom by the Financial Conduct Authority (“FCA”) (Registration Number 190412).

Please take the time to read and understand this Privacy Notice. If you have any questions about this Privacy Notice, please contact our GDPR Team via e-mail at DPO-SNEL@stifel.com.

Personal data we collect about you

We may collect and process the following personal data from you:

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give us by filling in forms or communicating with us, whether face-to-face, by phone, e-mail, or otherwise. This information may include:
 - Basic personal data, such as first name, family name, national insurance number, e-mail address, telephone numbers, address (including city, postcode, and country), occupation and job title, identification documentation, date of birth, life events, and family information; and
 - Sensitive personal data, which may be included in information about your nationality, place of birth, health-related information, disability status, or details of political affiliations.
- **Information that we collect or generate about you.** This may include:
 - Files that we may produce as a record of our relationship with our clients and prospective clients, including contact history; and
 - Any personal data that you provide during telephone and e-mail communications with us which we may monitor and record in order to resolve complaints, improve our service, and in order to comply with our legal and regulatory requirements, or any personal data which we obtain in relation to your use of our websites.
- **Information we obtain from other sources.** This may include:
 - Information from publicly available sources, including third-party agencies such as credit reference agencies, fraud prevention agencies, law enforcement agencies, public databases, registers and records, such as Companies House and the FCA Register, and other publicly available sources;

- Information obtained from independent financial advisors, other professional advisers, product providers, event organisers, and other agents and/or representatives; and
- Information obtained from sanctions checking and background screening providers.

Uses of your personal data

Your personal data may be stored and processed by Stifel in the following ways and for the following purposes:

- To contact and interact with you to perform our obligations under our contract with you or your organisation;
- 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 e-mails 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 report tax-related information to tax authorities in order to comply with our legal obligation;
- 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, manage and host events, and to administer and manage our website, systems, and applications;
- To manage access to our premises and for security purposes;
- 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
- 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 service.

We are entitled to use your personal data in these ways on the basis of one or more of the following reasons:

- We have obtained your consent;
- To fulfil the performance of a contract between the data subject and ourselves, in our capacity as the data controller;
- To comply with legal and/or regulatory obligations which we have to discharge;
- In order to establish, exercise, or defend our legal rights or for the purpose of legal proceedings; and/or
- The use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - Allowing us to effectively and efficiently manage and administer to operation of our business;
 - Maintaining compliance with internal policies and procedures;

- Enabling quick and easy access to information on our services; and
- Offering effective, up-to-date security solutions for mobile devices and IT systems.

Information about other persons

If you provide us with personal data about any person other than yourself, 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.

We will not use your personal data for taking any automated decisions affecting you or creating profiles other than as described above.

Disclosure of your personal data

We may disclose your personal data as follows:

- To our affiliated companies (including those located in the United States) for the above-mentioned purposes. We will take steps to ensure that the personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this Privacy Notice;
- To companies providing services for money laundering and terrorist financing checks and other fraud and crime prevention purposes and companies providing similar services;
- To courts, law enforcement authorities, regulators, governmental officials, and other bodies as required by law or as requested;
- To third-party vendors in order to process the personal data for the above-mentioned purposes;
- To our and our affiliated companies’ professional advisers, subject to confidentiality obligations;
- 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 of personal data outside the European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“**EEA**”). It may also be processed by staff operating outside of the EEA who work for our affiliates or for one of our suppliers.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways. For instance:

- The country that we send the data to might be approved by the European Commission;
- The recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- Where the recipient is located in the U.S., it might be a certified member of the EU-US Privacy Shield scheme.

In other circumstances, the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us in accordance with the “Contacting us” section below.

Retention of personal data

How long we hold your personal data will vary. The retention period will be determined by various criteria, including:

- The purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- Legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- The right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- The right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- In some circumstances, the right to receive some personal data in a structured, commonly used, and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- The right to request that we rectify your personal data if it is inaccurate or incomplete;
- The right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- The right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and/or to refuse that request; and
- The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting us” section below.

You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

Changes to our Privacy Notice

We reserve the right to update and amend this Privacy Notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes we may make to our Privacy Notice in the future will be posted on our website and/or, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Notice.

Contacting us

If you would like further information on the collection, use, disclosure, transfer, or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments, and requests to DPO-SNEL@stifel.com.