

**PEEL
HUNT**

**WORKPLACE
PRIVACY NOTICE**

April 2024

Introduction

Like most businesses, Peel Hunt Europe holds and processes a wide range of information, some of which relates to individuals who work for us. This Workplace Privacy Notice explains the type of information Peel Hunt Europe processes, why Peel Hunt Europe is processing it and how that processing may affect the individual.

This Workplace Privacy Notice focuses on individuals who work for Peel Hunt Europe, whether employed by us or not.

In 'Annex 1 - Supplementary Information', Peel Hunt Europe explains what is meant by 'personal data', 'processing', 'special categories of personal data' and other terms used in this Workplace Privacy Notice.

In brief, this Workplace Privacy Notice explains:

- what personal data Peel Hunt Europe holds and why it is processed;
- the legal grounds which allow Peel Hunt Europe to process an individual's personal data;
- where the data comes from, who gets to see it and how long we keep it;
- how the individual can access personal data and other rights; and
- how to contact Peel Hunt Europe.

Personal Data – what we hold and why we process it

Peel Hunt Europe processes data for the purposes of our business including management, administrative, employment and legal purposes. Annex 1 - Supplementary Information provides more specific information on these purposes, on the type of data that may be processed and on the grounds on which we process data.

Where the data comes from and who gets to see it

Some of the personal data that we process comes from the registered individual themselves. For example, the individual tells us their contact and banking details.

Other personal data is generated in the course of the individual's work, for example, from managers, clients or others outside our organisation with whom the individual deals.

The individual's personal data will be seen internally by some people within Peel Hunt Europe in order to fulfil their legal, contractual and regulatory obligations and duties (for example, in HR and Compliance; and the individual's line-manager, to manage the individual and their performance). In some circumstances, colleagues may also be able to see some limited information about an individual (for example, mobile telephone number on the internal Facebook page of our intranet). Peel Hunt Europe will, where necessary, and as set out in this Workplace Privacy Notice, also pass the individual's data outside the organisation, for example to people the individual is dealing with and to payroll agencies.

Further information on this is provided in Annex 1 - Supplementary Information.

Please note: References throughout this Privacy Notice to employees, employment, employment contracts, work or similar expressions, include any arrangement that we may have under which an individual provides us with work or services. This includes, but is not limited to: employees, temporary workers, contractors, consultants, agents, advisors and interns.

How long do we keep personal data?

Peel Hunt Europe does not keep an individual's personal data for any longer than is necessary for the purposes for which the data has been collected and processed. In general, we will keep the individual's personal data for the duration of the employment and for a reasonable period afterwards in respect of each of the relevant data categories which generally will be five years after end of employment. In considering how long to keep the individual's data, Peel Hunt Europe will take into account its relevance to our business and the employment, either as a record or in the event of a legal claim.

Transfers of personal data outside the EEA

In connection with Peel Hunt Europe's business, and for employment, administrative, management and legal purposes, we will, where necessary, and as set out in this Workplace Privacy Notice, transfer the individual's personal data outside the EEA to members of the Peel Hunt group, processors in the US and, on occasion, to other jurisdictions in which Peel Hunt is established. When doing so, Peel Hunt Europe 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 putting appropriate safeguards in place to ensure an adequate level of protection for the personal information so transferred. Transfer of personal data from Peel Hunt Europe to recipients outside of the EEA will be based on sufficient safeguards of the EU Commission Standard Contractual Clauses.

The individual's data rights

The individual has a right to make a subject access request (“indsigtsanmodning”) to receive information about the personal data that Peel Hunt Europe processes about. Further information on this and on other rights is in Annex 1 - Supplementary Information, where we also explain how to make a complaint about our processing of the individual's personal data.

Contact details

In processing the individual's personal data, Peel Hunt Europe Fondsmæglerselskab A/S acts as data controller.

If the individual has any questions about this Workplace Privacy Notice, or want to exercise the rights set out in this Workplace Privacy Notice, please contact us by:

sending an e-mail to dpo@dk.peelhunt.com;

writing to us at our registered address: C/O Zieglers Gaard Office Club, Nybrogade 12, 1203 Copenhagen; or

telephoning us on +45 3143 7641.

The individual's right to lodge a complaint with the information commissioner's office

If an individual has a concern about any aspect of our privacy practices, including the way we have handled personal information, the individual can report it to the Danish Data Protection Agency (DPA). The Danish DPA can be contacted using the following website [Borger \(datatilsynet.dk\)](http://borger.datatilsynet.dk) or by calling their helpline on +45 33 19 32 00.

Status of this workplace privacy notice

This Workplace Privacy Notice does not form part of the contract of employment and does not create contractual rights or obligations. It may be amended by Peel Hunt Europe at any time. Nothing in this Workplace Privacy Notice is intended to create an employment relationship between us and any non-employee providing services to us.

Annex 1: Supplementary information

1. What do we mean by "personal data" and "processing"?

1.1 Personal Data

'Personal data' means any information relating to the individual as a living person (the 'data subject') which can be used to identify the individual – directly or indirectly – by reference to an identifier such as a name, an identification number, location, an online identifier or to one or more factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity. It not only includes facts about the individual, but also intentions and opinions.

1.2 Processing of Personal Data

'Processing' means any operation which is performed on personal data, whether or not by automated means, such as the collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure or dissemination or erasure or destruction of personal data.

1.3 Special categories of Personal Data

Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual orientation, sex life, trade union membership and genetic and biometric data are subject to special protection and considered by EU privacy law to be 'special categories of personal data'.

1.4 Scope

References in this Workplace Privacy Notice to employment, work (and similar expressions) include any arrangement Peel Hunt Europe may have under which an individual provides us with work or services (including but not limited to employees, temporary workers, contractors, consultants, advisors and interns). By way of example, when we refer to an 'employment contract', that is taken to include a contract under which an individual provides us with services; when we refer to ending an employment, that includes terminating a contract for services.

2. Legal grounds for processing Personal Data

Under the GDPR and the Danish Data Protection Act, there are various grounds on which Peel Hunt Europe can rely, when processing the individual's personal data. In some contexts, more than one basis applies. We have summarised these legal bases in accordance with article 6 of GDPR as Contract, Legal Obligation, Legitimate Interests and Consent, and we outline what those terms mean in the following table.

2.1 Personal Data

'Personal data' means any information relating to the individual as a living person (the 'data subject') which can be used to identify the individual – directly or indirectly – by reference to an identifier such as a name, an identification number, location, an online identifier or to one or more factors specific to their physical, physiological, genetic, mental, economic, cultural or social identity. It not only includes facts about the individual, but also intentions and opinions.

Term	Grounds for processing	Explanation
Contract (GDPR art. 6 (1) litra b)	Processing necessary for the performance of a contract with the individual, or to take steps to enter a contract.	These covers carrying out Peel Hunt Europe's contractual duties and exercising our contractual rights such as those set out in our terms of employment.
Legal obligation (GDPR art. 6 (1) litra c)	Processing necessary to comply with Peel Hunt Europe's legal obligations.	Ensuring we perform our legal and regulatory obligations. For example (but without limitation), providing a safe place of work and avoiding unlawful discrimination.
Legitimate Interests (GDPR art. 6 (1) litra f)	Processing necessary for Peel Hunt Europe's, or a third party's, legitimate interests.	Peel Hunt Europe may process the individual's personal information for our and others' legitimate business interests whilst applying appropriate safeguards that protect the individual's privacy. The individual's data will not be processed on this basis if our, or a third party's, interests are overridden by the individual's own interests, rights and freedoms.
Consent (GDPR art. 6 (1) litra a)	The individual has given specific consent to the processing of their data.	In general, processing of the individual's data in connection with employment is not conditional on consent, but there may be occasions.

3. Processing special categories of Personal Data

Peel Hunt Europe may process special categories of personal data (for example, storing health and safety workplace assessments), but only when one or more of the following legal bases for processing such personal data applies:

Processing being necessary for the purposes of Peel Hunt Europe's or the individual's obligations and rights in relation to employment, in so far as it is authorised by law or collective agreement (GDPR art. 9 (2) litra b);

Processing relating to data that the individual has made public (GDPR art. 9 (2) litra e);

Processing being necessary for the purpose of establishing, making or defending legal claims (GDPR art. 9 (2) litra f);

Processing being necessary for provision of health care or treatment, medical diagnosis, and assessment of the individual's working capacity (GDPR art. 9 (2) litra h).

In addition, Peel Hunt Europe may process personal data on the legal bases of the section 8 (3) (criminal offences) if an explicit consent has been obtained or for the purpose of safeguarding a legitimate interest and this interest clearly overrides the interests of the data subject, 11 (2) (Danish social security number, CPR) if this follows from applicable law and 12 (employee personal data comprising of both special categories of personal data and regular personal data) of the Danish Data Protection Act.

4. Further information on the data we process and our purposes

This Workplace Privacy Notice outlines the purposes for which Peel Hunt Europe processes the individual's personal data. More specific information on these, examples of the data and the grounds on which we process data, are outlined in the table below.

The examples in the table cannot, of course, be exhaustive. For example, although the table does not mention data relating to criminal offences, if Peel Hunt Europe were to find out that someone working for us was suspected of having committed a criminal offence, Peel Hunt Europe will process that information if necessary for our purposes. Peel Hunt Europe also requires criminal background checks to the extent permitted by Danish law (dependent on the nature of the role).

Purpose	Examples of personal data that may be processed	Grounds for processing
Recruitment	<p>Standard data related to the individual's identity (e.g. name, address, email address, identity verification documentation, telephone numbers, place of birth, nationality, contact details, professional experience and education (including university degrees, academic records, professional licenses, memberships and certifications, awards and achievements, and current and previous employment details), financial information (including current salary and other remuneration information), language skills, and any other personal data that the individual presents us with as part of the application, related to the fulfilment of the role).</p> <p>Information concerning the individual's application, and Peel Hunt Europe's assessment of it, the individual's references, any checks we may make to verify information provided or background checks, and any information connected with the individual's right to work.</p> <p>If necessary, Peel Hunt Europe will also process information concerning health, any disability, and in connection with any adjustments to working arrangements.</p>	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interests:</p> <p>To carry out informed recruitment decisions</p>
The employment contract including entering it, performing it	Information on the terms of employment, from time to time, including the individual's hours and working patterns and pay and benefits, such as participation in pension	<p>Contract</p> <p>Legal obligation</p> <p>Legitimate interest:</p> <p>To have an accurate record of the individual's</p>

and changing it	arrangements, life and medical insurance; and any bonus or share schemes.	employment contract for its performance and variation
Contacting details	The individual's address and telephone number, emergency contact information and information on the individual's next of kin.	Contract Legal obligation Legitimate interest: the ability to contact the individual, or others on their behalf in an emergency
Payroll and benefits administration	Information on the individual's address, date of birth, bank account details, pension contributions, private medical insurance cover details, critical illness, national or social insurance number, unique taxpayer reference or other government issued identifier. Information on family leave or other forms of leave, including holiday and sickness absence.	Contract Legal obligation Legitimate interest: the ability to carry out payroll, general HR and business administration, and to plan around the individual's absence and ensure pay is applied as per the companies policies Danish social security number (CPR)
Financial planning and budgeting	Information such as salary and other remuneration.	Contract Legitimate interest: the ability to carry out effective financial planning, budgeting for our business, analysis and benchmarking
Supporting and managing work and performance, and any health concerns	Information connected with the individual's work; anything the individual does at work; and the performance, including records of documents and emails created by or relating to the individual and information on the individual's use of our systems including computers, laptops or other device. Management information regarding the individual, including notes of meetings	Contract Legal obligation Legitimate interest: the ability to support our workforce and support career development or performance, ensure compliance with our policies and relevant regulated authorities, the investigation of disciplinaries and

	<p>and appraisal records, and information the individual or managers enter onto our training or appraisal platforms.</p> <p>Information relating to the individual's compliance with Peel Hunt policies.</p> <p>Information concerning disciplinary allegations, investigations and processes and relating to grievances or complaints in which the individual is, or may be, directly or indirectly involved.</p> <p>Information concerning the individual's health, including medical or doctors' notes, return to work plans, and medical and occupational health reports.</p> <p>Information for the purposes of absence records maintenance.</p>	<p>grievances where this becomes necessary, to manage work</p> <p>capacity, and to ensure the health, safety and wellness of our staff</p>
Changing or ending working arrangements	<p>Information connected with anything that may affect the individual's continuing employment, or the terms on which the individual work, including any proposal to promote, to change pay or benefits, to change working arrangements, or to end the individual's employment.</p>	<p>Contract</p> <p>Legitimate interest:</p> <p>the ability to change or end working arrangements</p>
Physical and system security	<p>The individual's IT account and directory information.</p> <p>Records of use of swipe and similar entry cards, and CCTV footage.</p> <p>Records of use of Peel Hunt Europe's systems including computers, company phones and other company devices and passwords.</p>	<p>Legal obligation</p> <p>Legitimate interest:</p> <p>the ability to keep our locations secure, provide a safe environment for our personnel as well as ensuring appropriate market conduct</p>
Improving efficiency of IT and business systems and device use	<p>Records of use of Peel Hunt Europe IT and business systems.</p> <p>We will, where necessary, and as set out in this Workplace Privacy Notice,</p>	<p>Legitimate interest:</p> <p>to ensure and improve efficiency of IT and business systems and device use</p>

	<p>also contract with third parties so the individual can use third party applications on Peel Hunt systems and devices to assist with work (e.g. an application allowing ‘one-click’ dial-in to conference calls). Such applications will process the user’s personal data. These third parties’ own privacy notices will make clear precisely what information will be collected. Peel Hunt Europe may be provided with information on the usage of such applications, for example for the purpose of troubleshooting or assessing overall usage and whether to continue to provide them.</p>	
<p>Providing references in connection with the individual finding new employment or for other requested purposes.</p>	<p>Information on the individual working for us, including (but not limited to): salary information, job title, regulated function, dates of employment or membership, and on occasion (where required, for legal or regulatory reasons), on performance and conduct.</p>	<p>Legal obligation</p> <p>Legitimate interest:</p> <p>to provide the regulated authorities with information relating to conduct and capability as required and to provide accurate references</p>
<p>Monitoring and investigating suspicions of misconduct, compliance with policies and rules – both generally and specifically (including any monitoring as required for regulatory reasons)</p>	<p>We expect all individuals who work for, or at, Peel Hunt to comply with our policies and rules and we may monitor our systems, and each individual’s communications using those systems, to check compliance with those policies (e.g. rules on market abuse).</p> <p>We will, where necessary, and as set out in this Workplace Privacy Notice, check systems, telecommunications, electronic communications and other data and records as part of any investigation into potential breaches of regulations or policies. In appropriate cases, if we have suspicions of serious</p>	<p>Legal obligation</p> <p>Legitimate interest:</p> <p>to ensure that our employees and workers comply with our policies, rules and legal/regulatory obligations</p>



	wrong-doing, we may make targeted records (e.g. video or audio) in connection with an investigation.	
Disputes and legal proceedings	Any information relevant or potentially relevant to a dispute or legal proceeding affecting Peel Hunt Europe.	Legal obligation Legitimate interest: the ability to investigate, establish, commence, respond to and defend against legal claims
Day to day business operations including marketing and client relations and travel on our behalf	Information relating to the work the individual does for Peel Hunt Europe, their role and contact details including relations with current or potential clients. This may include a photograph of the individual, for internal or external use. Information regarding travel arrangements and location.	Legitimate interest: to allow the effective operation of day-to-day business, marketing and client relations and travel
Maintaining appropriate business records, during and after employment	Information relating to the individual's work, anything they do at work and performance relevant to such records.	Contract Legal obligation Legitimate interest: To maintain appropriate business records during and after employment to the extent permitted



Regulatory interactions and compliance	Information relating to the individual and their work may be processed as necessary in relation to any regulatory communications and/or compliance	Legal obligation Legitimate interest: To maintain appropriate records and to interact effectively with our regulators
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5. Where the data comes from

When the individual starts working with us, the initial data that Peel Hunt processes is likely to come from the individual themselves: for example, contact details, bank details and information on immigration status and whether the individual can lawfully work for Peel Hunt Europe. We will, where necessary and permitted by law, and as set out in this Workplace Privacy Notice, also require references and information to carry out background checks. In the course of employment, the individual may be required to provide Peel Hunt Europe with information for other purposes, such as sick pay (including reimbursement of sick pay) and family rights (e.g. maternity and paternity leave and pay). If the individual does not provide information as required by statute or contract, the individual may lose benefits or Peel Hunt Europe may decide not to employ the individual or to end the contract. In case of any concerns about this in a particular context, please speak to HR.

In the course of the individual’s work, Peel Hunt Europe may receive personal data from others. Internally, personal data may be obtained or derived about the individual from managers and other colleagues or our IT systems; externally, it may be derived from our clients or those with whom the individual communicates by email or other systems.

6. Who gets to see personal data?

6.1 Internal use

Where necessary, and as set out in this Workplace Privacy Notice, personal data will be disclosed to HR and Compliance and line-managers, for employment, administrative and management purposes. Peel Hunt Europe may, where necessary, and as set out in this Workplace Privacy Notice, also disclose this to other members of the Peel Hunt group. Reference is made to paragraph 5 of this Workplace Privacy Notice regarding any transfers of personal data outside of the EEA in this regard.

6.2 External use

Peel Hunt Europe will only disclose and transfer individual’s personal data outside Peel Hunt if disclosure or transfer is consistent with one of the grounds for processing on which we rely, and doing so is lawful and fair to the individual.

We will transfer personal data if it is necessary for our legitimate interests as an organisation or the interests of a third party; but we will not do this if these interests are overridden by the individual’s interests and rights, in particular to privacy. We will also transfer personal data,

where we are required to do so by law and in connection with criminal or regulatory investigations.

Specific circumstances in which personal data may be disclosed include (but are not limited to):

organisations that process data on Peel Hunt Europe's behalf, such as payroll providers, benefit providers, as well as organisations that host IT systems and data; and

external recipients of electronic communications (such as emails) that contain personal data;

We may also transfer your personal data to the following categories of separate data controllers:

banks and insurers;

on a confidential basis, to a potential buyer of our business or company for the purposes of evaluation – but only if Peel Hunt were to contemplate selling;

law enforcement agencies to respond to law enforcement agency requests or where required by applicable laws, pursuant to court orders, or arbitral or tribunal orders or rules of procedure, or to government regulations departments or agencies or regulatory bodies (including disclosures to tax, employment and financial authorities), employment and any other regulatory bodies;

on a confidential basis to our advisers, for example (but without limitation) to lawyers for the purposes of seeking legal advice, or to further Peel Hunt Europe's interests in legal proceedings, or to our accountants for auditing purposes; and

any regulators, as necessary.

7. Retaining personal data – more information

Peel Hunt Europe will not keep personal data for longer than is necessary for the purposes for which it has been collected and processed. In general, we will keep the individual's personal data for the duration of the employment and for a period afterwards which generally will be five years after end of employment. In considering how long to keep it, we will take into account its relevance to our business and the employment, either as a record or in the event of a legal claim.

For more information, please see Appendix 12 of our Records Management Policy.

8. Access to personal data and other rights

Peel Hunt Europe tries to be as open as we reasonably can about personal data that we process. As data subject, the individual can contact HR for more specific or further information.

The individual also has a legal right to make a 'subject access request' (anmodning om indsigt). If the individual exercises this right and Peel Hunt Europe holds personal data about the individual, Peel Hunt Europe is required to provide information on it, including:

giving a description and copy of the personal data; and
providing information (contextual) on why we are processing it.

If an individual makes a subject access request and there is any question on our part, we may require additional information so that we can satisfy ourselves as to the identity of the individual.

As well as subject access rights, the individual may have a legal right to have personal data rectified or erased, to object to its processing or to have its processing restricted. If the individual has provided Peel Hunt Europe with data about themselves (for example, address or bank details), the individual has the right to be given the data in machine readable format for transmitting to another data controller. This only applies if the grounds for processing such data is Consent or Contract.

If Peel Hunt Europe relied on consent as a grounds for processing, the individual may withdraw consent at any time. This will not affect the lawfulness of what Peel Hunt Europe has done before the individual withdrew consent.

9. Complaints

If the individual has complaints relating to Peel Hunt Europe's processing of personal data, we kindly request that these are raised with HR in the first instance. The individual may also raise complaints with the statutory regulator, in Denmark Datatilsynet (the Danish Data Protection Agency). For contact and other details, please see paragraph 8 of this Workplace Privacy Notice or ask HR.