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## EXTERNAL PRIVACY NOTICE

May 2024

## 1 Who we are

Peel Hunt Limited (“PHL”) is an investment services group, which, through its operating entities, offers research, sales, trading and corporate finance services (“services”) to clients (retail and professional), as well as to companies and institutional investors.

This Privacy Notice applies to PHL and its UK subsidiaries (“we”, “us”, “our” or “Peel Hunt”). Separate privacy notices apply to PHL’s other international entities, including Peel Hunt Inc (privacy notice available here) and Peel Hunt Europe Fondsmæglerselskab A/S (privacy notice available here).

Peel Hunt’s principal UK operating company is Peel Hunt LLP, which is authorised and regulated by the Financial Conduct Authority (“FCA”), has a registered office is at 100 Liverpool Street, London, EC2M 2AT, United Kingdom.

Peel Hunt is the data controller responsible for the personal data that you provide to us.

We respect the privacy, and are strongly committed to protecting the personal data, of every person who visits the peelhunt.com website (“our website”) including those who engage us to receive our services. We also safeguard any personal information provided to us by those applying to work at Peel Hunt.

## 2 Purpose of this Privacy Notice

This privacy notice (the “Privacy Notice”) explains: the nature of the personal data we might collect from you or which we have obtained about you from a third party; the purposes for which we process your personal data; our approach to protecting that personal data; and the rights you have, for example, to request that we delete, update, transfer or provide you with access to that personal data.

This Privacy Notice includes an outline of the personal data we hold in respect of persons that apply to work for us and how we process such data, however further information on this is set out in a separate [Recruitment Privacy Notice](#).

## 3 How to contact us

If you have any questions about this Privacy Notice, or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an email to [dpo@peelhunt.com](mailto:dpo@peelhunt.com);
- writing to us at our registered office address; or
- telephoning us on: 0207 418 8900.

## 4 What personal information we collect about you

Personal information, or personal data, is information that can be used to identify you or that is about you. We collect, process and store different types of personal data, depending on whether you are a visitor to our website or offices, an existing or prospective client or investor, or a potential new recruit to Peel Hunt.

The following is a non-exhaustive list of the personal information collected and processed as part of our business.

<b>Identity Data</b>	First name; last name, job title, business and personal biographical and background information and information about your business and its employees/officers, as relevant.
<b>Contact Data</b>	Billing address; email address; telephone number.

<b>Registration Data</b>	First name; last name; date of birth; gender; country; nationality; username; any KYC information that we may collect, such as passport, driving licence or ID card information, tax number, marital status and proof of address; any other personal data that you may provide when you register an account with us.
<b>Financial Data</b>	Bank account details and other payment information.
<b>Services Data</b>	Written and recorded telephone communications with you, other information relevant to our provision of services to you, including information we observe about you based on your interactions with our website.
<b>Behavioural Data</b>	Data relating to your browsing activity or interaction with our emails, obtained through the use of cookies, pixel tags and other similar technologies; information about when your current or previous sessions started; details about any products you viewed or purchased through the website.
<b>Technical Data</b>	IP address; browser type and operating system; geolocation, to ensure we're showing you the correct notices and information; any other unique numbers assigned to a device.
<b>Marketing and Communications Data</b>	Marketing preferences; service communication preferences.

## 5 What we use your personal data for and our legal bases

We rely on the following legal grounds to process your personal data:

### 5.1 Performance of a contract

It is necessary for us to store and use your personal data to perform our obligations or exercise our rights, pursuant to and in accordance with any contractual arrangement that we may have with you.

### 5.2 Compliance with law or regulation

We may use your personal data in order to comply with applicable law or regulation, for example (but without limitation):

- to comply with our 'Know Your Client', anti-money laundering, anti-bribery and other similar legal obligations;
- to record any trades and transactions with you;
- to make any necessary corporate filings;

### 5.3 Legitimate business interests

We may process your personal information for our and others' (including our clients') legitimate business interests whilst applying appropriate safeguards that protect your privacy.

### 5.4 Your consent

Where our use of your personal information requires your consent, you can provide such consent:

- at the time we collect your personal information following the instructions provided; or
- by informing us by email or post using the contact details set out in this Privacy Notice.

## 5.5 More information

More information about why we collect, process, maintain and store your personal data is set out below:

**Use of our website. For more information click [here](#).**

**If you register and access an account on our website**

You may be required to register an account with us in order to gain access to certain features and functionality of our website. Account applicants will need to provide all required Identity Data, Contact Data, Registration Data and/or Financial Data. We will use this data in order to process your registration.

*Our legal basis for processing*

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or it is in our legitimate interest to use personal data in such a way to ensure that we provide access to the website and our services in a secure and effective way and so that we can make improvements to our website.

**If you browse our website**

When you browse our website, we collect and process Behavioural Data and Technical Data to help us understand how you are using and navigating our website. We do this so that we can better understand which parts of our website are more or less popular and improve the structure and navigation of our website.

*Our legal basis for processing*

It is in our legitimate interest to use personal data in such a way to ensure that we provide access to our website in a secure and effective way and so that we can make improvements to our website.

**Fulfilment of our services. For more information click [here](#).**

**Identifying you for regulatory reasons**

We collect and maintain personal data that you submit to us for the purpose of verifying your identity to comply with regulatory obligations and policies relating to anti-money laundering, anti-bribery and 'Know Your Client' requirements.

*Our legal basis for processing*

It is necessary for us to use your personal data to comply with legal obligations to which we are subject.

**Fulfilment of our services and managing and administering our relationships**

We collect and maintain personal data that you submit to us for the purpose of supplying our services and managing and administering our relationships with our clients, their personnel and intermediaries. We may collect and process your personal data whether you are interacting with us on your own behalf or on behalf of any organisation you represent.

The personal data we process may include your Contact Data, Registration Data, Services Data and Financial Data (where applicable). We process this information so that we can fulfil the supply of services, maintain our user databases and to keep a record of how our services are being used.

*Our legal basis for processing*

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the services in an effective, safe and efficient way.

**Advertising and marketing activities. For more information click [here](#).**

**If we send you marketing communications**

We use your Identity Data, Contact Data and Marketing and Communications Data to send you (or the organisation you represent) marketing communications by post, telephone, text message and/or email, depending on your marketing preferences. Our marketing will include communications about our performance, invitations to events, press releases and information about us, our website and our services.

*Our legal basis for processing*

It is in our legitimate interest to use your personal data for marketing purposes, for example to decide what marketing content we think may appeal to you.

It is in our legitimate interest to use your personal data to send our marketing to you by post.

However, we will only send marketing communications to you by email where you have consented to receive such content by email or where we have another legal basis to send marketing to you using email. For example, in certain circumstances we may rely on our legitimate interest to send marketing by email to certain business users of our website and our services.

You have the right to ask us not to send you marketing messages by post, telephone, text message or email or any combination of these at any time.

You can do this by:

- unsubscribing by clicking on the relevant link included in a marketing email sent by us or following any other opt-out instructions provided in our marketing messages;
- sending an email to [dpo@peelhunt.com](mailto:dpo@peelhunt.com);
- writing to us at our registered office address; or
- by telephoning us on 0207 418 8900.

For more information about your rights in relation to your personal data, see section 10 below.

**Surveys and feedback. For more information click [here](#).**

**If you complete our surveys or provide feedback on your experience of our website and/or our services**

From time to time, we will invite you to provide feedback about us, our services and our events in the form of online surveys. We will collect and process your Identity Data, Contact Data and any other personal data you choose to volunteer in your survey response or other feedback.

We use this information to help us to monitor and improve our services and our events.

*Our legal basis for processing*

It is in our legitimate interest to use the personal data provided by you so that we can improve our website and our services and provide them in an effective way.

**Hosting and managing events. For more information click [here](#).**

**If you sign up for and/or attend one of our events**

From time to time, we may organise and host events for the purpose of promoting our business or for charitable causes or other reasons. We may process your Identity Data and Contact Data to communicate with you about such events where you have specifically requested information about such events or where we have another lawful basis for sending that information to you.

If you attend one of our events, we may use your Identity Data and Contact Data to record your attendance at the event and for related record-keeping purposes and, if relevant, we may collect and process any dietary requirements you may have. You may also feature in photographs taken at our events and such photographs may appear in publications that we make available.

*Our legal basis for processing*

It is necessary for us to use your personal data in this way to perform our obligations in accordance with any contract that we may have with you where you have signed up to a paid event, or it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that the event is operated in an effective way.

We may specifically ask your permission to use your photographs, quotes, testimonials, or other content that you make available or publish at the event. Where this is the case, our processing of your such personal data will be based on consent.

**Recruitment. For more information click [here](#) and in our [Recruitment Privacy Notice](#).**

**If we use your personal data in connection with our recruitment activities**

We use your personal data for recruitment purposes, in particular, to assess your suitability for any of our positions that you apply for, whether such application has been received by us online, by email or by hard copy and whether submitted directly by you or by a third-party recruitment agency on your behalf. We also use your Identity Data and Contact Data to communicate with you about the recruitment process, to keep records about our recruitment process and to comply with our legal and regulatory obligations in relation to recruitment.

We will process any personal data about you that you volunteer, including during any interview, when you apply for a position with us. We may also process your personal data obtained from any third parties we work with in relation to our recruitment activities, including without limitation, recruitment agencies, background check providers, credit reference agencies and your referees.

The personal data we process may include your Identity Data, Contact Data, details of your education, qualifications and employment history, any other personal data which appears in your curriculum vitae or application, any personal data that you volunteer during an interview or your interactions with us, or any personal data which is contained in any reference about you that we receive. Such information may also include special categories of personal data (such as information about your health, any medical conditions and your health and sickness records) and information relating to criminal convictions and offences if that information is relevant to the role you are applying for.

We also use your personal data for the purposes of reviewing our equal opportunity profile in accordance with applicable legislation. We do not discriminate on the grounds of gender, race, ethnic origin, age, religion, sexual orientation, disability or any other basis covered by local legislation. All employment-related decisions are made entirely on merit.

*Our legal basis for processing*

Where we use your personal data in connection with recruitment, it will be in connection with us taking steps at your request to enter into a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment decisions.

We may process special categories of personal data about you (for example, about your gender or for the purposes of diversity monitoring), but only where there are available grounds for processing, as further set out in our Recruitment Privacy Notice.

**Receipt of products and services from our suppliers. For more information click [here](#).**

**If we have engaged you or the organisation you represent to provide us with products or services**

If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as IT support or financial advice), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our services to others. The personal data we collect from you may include your Identity Data and Contact Data and any other personal data you volunteer which is relevant to our relationship with you or the organisation you represent.

*Our legal basis for processing*

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to receive the products and services that you or your organisation provides, and provide services to others, in an effective way.

**Security. For more information click [here](#).**

**If we need to use your personal data in connection with the administration of our security measures**

We have security measures in place at our premises, including CCTV and building access controls. There are signs in place showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

We may require visitors to our premises to sign in on arrival and where that is the case we will keep a record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need-to-know basis (e.g. to look into an incident).

*Our legal basis for processing*

It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.

**Business administration and legal compliance. For more information click [here](#).**

**If we need to use your personal data to comply with our legal obligations or in connection with the administration of our business**

We may use your personal data: (i) to comply with our legal obligations; (ii) to enforce our legal rights; (iii) to protect the rights of third parties; and (iv) in connection with a business transition such as a merger, reorganisation, acquisition by another company, or sale of any of our assets.

*Our legal basis for processing*

Where we use your personal data in connection with a business transition, to enforce our legal rights or to protect the rights of third parties, it is in our legitimate interest to do so. For all other purposes described in this section, we have a legal obligation to use your personal data to comply with any legal obligations imposed upon us, such as a court order.

We will not process any special (or sensitive) categories of personal data or personal data relating to criminal convictions or offences except where we are able to do so under applicable legislation or with your explicit consent.



**Training and/or utilising artificial intelligence algorithms and models (“AI”). For more information click [here](#).**

**If we use personal data in the context of training and/utilising AI within our business**

We use AI in a limited way across our business, including optimisation of our marketing, and improving the efficiency of our business. We may use Identity Data, Contact Data, Registration Data, Financial Data, Services Data, Behavioural Data, Technical Data and Marketing and Communications Data in order to train and/or use AI in the course of our business. In addition to any AI we develop ourselves, we also use AI solutions and/or tools developed by third party providers.

*Our legal basis for processing*

It is in our legitimate interests to use your personal information in this way to optimise our marketing, improve the efficiency of our business, and provide a more effective service.

Additionally, the AI we develop and/or use does not make any decisions about you. The AI is only used as a tool to identify ways in which we can be more effective and efficient as a business. Furthermore, we only use AI in a limited number of ways, each of which uses minimal amounts of your personal information.

For more information about how we use personal information in AI, please contact us using the details set out in the “How to contact us” section above.

## 6 Cookies

Cookies are text files containing small amounts of information that are downloaded to your computer or other device when you visit a website - if your browser settings allow it. These cookies are accessed by the originating website on each subsequent visit. The firm has a Cookies Notice which provides more information about the cookies we use and how you can manage your cookie preferences, a copy of which is available [here](#).

## 7 Sharing data

We will only share personal data with trusted third parties pursuant to contractual arrangements or legal/regulatory obligations we have with or owe to them. When we share personal data with others, we put contractual arrangements and security mechanisms in place to protect the data and to comply with our data protection, confidentiality and security policies.

We have set out below some of the third parties with whom we may share your personal information:

- third party systems providers - we use third parties to support us in providing our services and to help provide, run and manage our internal IT systems. For example, providers of information technology, cloud based software as a service providers, identity management, website hosting and management, data analysis, data back-up, security and storage services. The servers powering and facilitating that cloud infrastructure are located in secure data centres around the world, and personal data may be stored in any one of them;
- other organisations that assist Peel Hunt in providing or administering our services;
- companies that assist us with our marketing activities;
- our auditors, lawyers, accountants and other professional advisers;
- law enforcement agencies, branches of central and local government, and regulatory bodies/authorities;
- third parties involved in organising events or seminars;
- third parties involved with the services we provide to clients, such as counterparties and their professional advisers and intermediaries, and courts, tribunals, public registrars and stock exchanges; and
- third parties to whom we may choose to sell, transfer or merge parts of our business or our assets.



Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable laws and regulations, to investigate an alleged crime, or to establish, exercise or defend legal rights. We will only fulfil requests for access to personal data where we are permitted to do so in accordance with applicable laws or regulations.

## 8 Transfers of personal data outside the European Economic Area (EEA) and/or UK

Where necessary, in order to deliver our services, we will transfer personal data to countries outside the EEA and/or the UK (including to our US entity Peel Hunt, Inc.).

Non-EEA/UK countries do not have the same data protection laws as the EEA and UK, in that some non-EEA/UK countries may not have the same level of protection for your personal information, may not confer to you as a data subject the same rights in relation to your personal information, and/or may not have a data protection supervisory authority to help you if you have any concerns about the processing of your personal information. For this reason, when we transfer your personal information outside the EEA and/or UK, we 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.

When transferring your personal information outside the EEA or UK, we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us (using the contact details in the “How to contact us” section above) if you would like further information on the specific mechanisms used by us when transferring your personal information outside the EEA or the UK.

<b>Adequacy decisions</b>	We may transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission and/or the UK Government (as applicable).
<b>Model clauses</b>	Where we use certain service providers or when transferring personal information within our company group, we may use specific standard contractual clauses approved by the European Commission and/or the UK Government which give personal information the same protection it has in the EEA and/or the UK.
<b>Binding corporate rules</b>	Where we use certain service providers, we may rely on their binding corporate rules approved by the relevant supervisory authority which give personal information the same protection it has in the EEA and/or the UK.

## 9 How long we keep your personal information

We only retain personal information about you for as long as is reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect of our relationship with you.

When determining relevant retention periods, we take into account factors including:

- the volume, nature and sensitivity of the personal data;
- the potential risk of harm from unauthorized use or disclosure of your personal data;
- our contractual and business relationships with you and the purpose for which we hold your personal information;
- any legal obligations to which we are subject which require us to retain data for a certain period of time;
- relevant statutes of limitations;
- any actual or potential disputes with you;

- best practice; and
- guidelines issued by relevant regulators and supervisory authorities.

After the relevant period has expired, we may delete personal data without further notice or liability. You can also ask us to delete your personal data in some circumstances; see section 10.3 (Your right to erasure) below for more information.

### Confidentiality and security of your personal information

We take the security of all the data we hold very seriously. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security. We regularly review the appropriateness of these measures to keep your personal safe and secure.

In particular, we have implemented information security policies, rules and technical measures to protect the personal information that we have under our control from:

- unauthorised access;
- improper use or disclosure;
- unauthorised modification; and
- unlawful destruction or accidental loss.

In addition, all of our members, employees, workers, subcontractors, advisors, and service providers who are involved in processing personal information, are obliged to respect the confidentiality of, and implement appropriate security measures to protect, the personal information of visitors to our website and all users of our services.

## 10 How to access your information and your other rights

Under certain circumstances, by law you may have the following rights in relation to the personal information we hold about you:

### 10.1 Your right of access

You may request access to your personal information and information about how we process it.

### 10.2 Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification, and if we have shared your personal information with others, we will let them know about the required rectification, where possible. On request, and where possible and lawful to do so, we will inform you who we have shared your personal information with.

### 10.3 Your right to erasure

You may request that we delete or remove your personal information in some circumstances, such as where we no longer need it or if you withdraw your consent for us to process it (where you are entitled so to do). If you are entitled to erasure and if we have shared your personal information with others, we will let them know about the erasure, where possible. On request, and where it is possible and lawful for us to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

### 10.4 Your right to data portability

In certain circumstances, you may request that we send you your personal information (in a structured, commonly used and machine readable format) such that you may re-use it elsewhere, or that we transfer it to a third party of your choice.

## 10.5 Your right to restrict or object to our processing of personal data

You may object to, or request the restriction of, our processing of your personal information.

## 10.6 Your rights in relation 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 – or similarly significantly affects you – unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

## 10.7 Your right to withdraw consent

If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time.

If you want to exercise any of the above rights, please contact us at: [dpo@peelhunt.com](mailto:dpo@peelhunt.com).

## 10.8 Collection of information by third-party sites and sponsors

Our website contains links to other sites whose data privacy practices may be different from our own. Visitors should consult the other sites' privacy notices as Peel Hunt LLP has no control over information that you submit to, or is collected by, these third parties.

## 11 Your right to lodge a complaint with the Information Commissioner's Office

If you wish to request further information about any of the above, or if you are unhappy with how we have handled your personal information, please contact us at [dpo@peelhunt.com](mailto:dpo@peelhunt.com).

If you are not satisfied with our response to your complaint or believe our processing of your personal information does not comply with data protection law, you can make a complaint to the Information Commissioner's Office (ICO). You can contact the ICO using the following website <https://ico.org.uk/concerns/> or by calling their helpline on 0303 123 1113.

## 12 Changes to this Privacy Notice

To ensure that you are always aware of how we use your personal information, we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. However, we encourage you to review this Privacy Notice periodically to be informed of how we use your personal information.