

## DATA PROTECTION NOTICE

Investec Europe Limited trading as Investec Europe is regulated by the Central Bank of Ireland. Registered in Ireland Number 222173. Registered office The Harcourt Building, Harcourt Street, Dublin 2, D02 F721.

At Investec Europe data privacy is taken seriously and we are committed to processing your personal data in accordance with EU data protection laws. This Data Protection Notice aims to give you information on how your personal data (*i.e.*, information which directly or indirectly identifies you) are processed by Investec Europe ("we", "us", "our"). For the purposes of EU data protection laws, Investec Europe is the data controller.

**Data That May Be Collected.** We may collect certain personal data with respect to you, including, without limitation: (i) all personal data provided by you such as, contact details, national identity numbers, tax status, tax identification number (such as Public Personal Service Number) employment history, bank account details and (ii) information we may collect from third parties such as background screening service providers and public sources such as Companies Registration Office and (iii) we may monitor and/or record your telephone calls and electronic transactions. We will only collect and process your sensitive personal data (such as health data) with your explicit consent or where the processing is specifically authorised by a regulatory body or required by law.

**Use of Personal Data.** We will use your personal data for: (i) the provision of products and/or services requested by you; (ii) managing your accounts; (iii) making credit decisions (where applicable); (iv) detecting and preventing fraud and money laundering; (v) statistical analysis and assessment; and (vi) otherwise as necessary to comply with applicable laws, regulations and/or codes of practice. The provision of personal data by you may be necessary in order for us and other third parties to which personal data are disclosed to provide you with the requested services, for the performance of any contractual relationship with you or in compliance with any legal or regulatory obligation and for the other purposes as set out in this Notice where in our legitimate interests.

**Disclosure to Certain Third Parties.** We may disclose certain personal data: (i) to other affiliates in the Investec Group; (ii) to our professional advisors, receivers and administrators (where applicable), and service providers (including, information technology systems providers); (iii) to your professional advisors and any other organisations party to a financing deal: (iv) to courts, governmental and non-governmental regulators and ombudsmen; (v) to fraud prevention agencies and law enforcement agencies; (vi) to any third party that acquires, or is interested in acquiring, all or part of our assets or shares, or that succeeds us in carrying on all or a part of its business, whether by merger, acquisition, reorganisation or otherwise; (vii) as otherwise required or permitted by law. Where you have been introduced to us by an introducer (e.g. an independent financial adviser) we will inform the introducer of the outcome of the enquiry including whether we have agreed to provide you with the relevant product or service.

**Transfer of Personal Data outside the European Economic Area ("EEA").** We may transfer your personal data to recipients (including affiliates in the Investec Group) located in countries outside of the EEA, including in South Africa, which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all necessary steps to protect your personal data in accordance with applicable data privacy laws.



**Your Rights.** Under applicable EU data privacy laws, you may have a right to: (i) request access to and rectification or erasure of your personal data; (ii) obtain restriction of processing or to object to processing of your personal data; and (iii) data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances). If you wish to exercise any of these rights you should contact the Data Protection Manager as described below. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority. The details of the Offices of the Data Protection Commissioner are as below:

Canal House, Station Road, Portarlington, Co. Laois, R32 AP23, Ireland. Phone +353 (0761) 104 800 | LoCall 1890 25 22 31 | Fax +353 57 868 4757 | email <u>info@dataprotection.ie</u>

**Marketing.** We may contact you periodically to provide information regarding events, products, services and content that may be of interest to you and to invite you to participate in market research. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you wish to stop receiving marketing or market research communications from Investec Europe you can click on the unsubscribe link in the marketing communication, liaise with your Relationship Manager or contact the Data Protection Manager as described below.

**Security and Data Retention.** We will take steps to protect your personal data against loss or theft, as well as from unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held. Subject at all times to applicable laws, we will retain your personal data for a period up to 7 years from the end of the relationship.

**Enquiries, Requests or Concerns.** All enquiries, requests or concerns regarding this Notice or relating to the processing of personal data, should be sent to the Data Protection Manager at Investec Europe Limited, Harcourt Building, Harcourt Street, Dublin 2

**Updates to this notice.** We may make amendments to this notice from time to time and you will find the most upto-date notice on our website at investec.ie/DPN.

