

## **PRIVACY POLICY**

This document sets out the manner in which and the purpose for which personal data will be processed by EnVent Capital Markets, in its capacity as data controller (the “Data Controller” or “EnVentCM”). It also sets out the other information required to be given by law, including information on the data subject’s rights and how to exercise them.

Regulation (EU) 2016/679 on the protection of personal data (the “Regulation”) lays down rules on the protection of persons with regard to the processing of personal data and on the free movement of such data, and safeguards individuals’ fundamental rights and freedoms, with particular regard to the data subjects’ right to have their personal data protected.

Under Article 4, No. 1 of the Regulation, “Personal Data” means any information relating to an identified or identifiable natural person (the “Data Subject”).

“Data Processing” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (Article 4, No. 2 of the Regulation).

Pursuant to Articles 12 et seq. of the Regulation, the Data Subject must also be made aware of the appropriate information concerning: (i) the Data Processing conducted by the Data Controller; (ii) the rights of Data Subjects.

### **1. THE PURPOSES OF THE PROCESSING AND LEGAL BASIS**

Personal data is processed for the purpose of:

- a) fulfilling legal obligations generally imposed on the Firm and, specifically, obligations to identify and store information for anti-money laundering purposes and the reporting of suspicious transactions;
- b) sending documentation related to the securities that Envent Capital Markets covers in the activities of Advisor, Arranging, Placement and Equity Research.

As the Personal Data has to be processed for the purposes indicated under points (a) above so that the Firm can perform compliance checks and contractual and/or pre-contractual obligations and fulfil specific legal obligations, the Data Subject’s consent is not required for those purposes.

### **2. METHODS FOR PROCESSING AND STORING DATA**

In compliance with the provisions of Article 5 of the Regulation, Personal Data processed is:

- a) processed lawfully, fairly and in a transparent manner in relation to the Data Subject;
- b) collected and registered for specified, explicit and legitimate purposes, and further processed in a manner that is compatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) processed in a manner that ensures appropriate security;
- f) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data are processed.

Personal Data will be processed by the Data Controller by automated and non-automated means. The Personal Data will be stored electronically on secure servers located in restricted areas with limited access.

Specific security measures are adopted so as to prevent data being lost or used in an unlawful or improper manner, as well as to prevent unauthorised access thereto.

### 3. PROVISION OF PERSONAL DATA

If a Data Subject does not provide the relevant Personal Data, the Firm will be unable to end the documentation related to the securities that Envent Capital Markets covers in the activities of Advisor, Arranging, Placement and Equity Research.

### 4. STORAGE OF PERSONAL DATA

Personal Data is stored for the time strictly necessary to achieve the purposes for which it has been collected and processed. Therefore, as a general rule, Personal Data will be stored for the entire term for which the relationship with the Firm is ongoing.

### 5. DISCLOSURE OF PERSONAL DATA

Personal Data will be accessible by the persons in charge of processing it, as well as by the employee of EnVentCM.

### 6. PUBLIC DISCLOSURE OF PERSONAL DATA

Personal Data is not subject to public disclosure.

### 7. TRANSFER OF PERSONAL DATA ABROAD

Personal Data may be transferred to European Union Member States and third countries that are not part of the European Union for the purposes indicated in paragraph 1 above. If Personal Data is transferred outside the European Union without any decision having been taken by the European Commission on the adequacy of the protections provided in relation thereto, the applicable legislation on the transfer of Personal Data to third countries who are not part of the EU will still be observed.

### 8. THE DATA SUBJECT'S RIGHTS

Data Subjects can access their Personal Data at any time for the purpose of rectifying, erasing and generally exercising any and every right to which they are expressly entitled under the applicable legislation that protects their Personal Data. More specifically, they can exercise the following rights: to obtain confirmation as to whether or not Personal Data concerning them exists and to have it disclosed in an intelligible form, to know the source, purpose and manner in which Personal Data are processed; to know the identity of the Data Controller, as well as the identity of the data processors and the parties or categories of parties to whom Personal Data can be disclosed; verify whether or not the Personal Data is accurate or request that it be completed or updated or rectified; to request that Personal Data processed in violation of the law be erased, anonymised or blocked, as well as request the restriction of processing in accordance with the law, and object, in any event, in whole or in part, for legitimate reasons, to the processing thereof; to data portability; to file a complaint, report or petition with the Data Protection Authority, in those situations in which the required conditions are met. The applicable legislation also recognises the Data Subjects' right to object to their Personal Data being processed, as well as the right to revoke their consent to Data Processing at any time, without prejudice, however, to the lawfulness of the manner in which the Personal Data has been processed by the Data Controller on the basis of such prior consent.

### 9. DATA CONTROLLER AND DATA PROCESSOR

The Data Controller is EnVent Capital Markets, 42 Berkeley Square - London W1J 5AW.

### 10. NOTICES AND THE DATA SUBJECTS' EXERCISE OF THEIR RIGHTS

For the purpose of exercising their rights provided for under paragraph 8, Data Subjects can contact at any time Serena Polini, Compliance Officer (mail: [compliance@eventcapitalmarkets.co.uk](mailto:compliance@eventcapitalmarkets.co.uk)).