CITICS Europe - Client privacy notice

About this privacy notice

In this notice, "**we**", "**us**" and "**our**" means **CITIC Securities Europe B.V. ("CITICS Europe"),** being the entity providing services to you.

This privacy notice applies if you are a representative of a client or a prospective client of our organisation, so "**you**" means an employee, officer, third party representative or director of a client or a prospective client. The privacy notice sets out the basis on which any personal data about you may be processed by us. Please take the time to read and understand this privacy notice.

For the purposes of data protection laws, we are a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection laws.

Personal data that we may collect about you

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

- ❑ Information that you provide to us or one of our affiliates. This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise. This information may include:

  your full name, date of birth, gender, place of birth, nationality, postal address and related contact information, including telephone numbers, email address and identification documentation, including passport and other government or state issued forms of personal identification, photographic or video images, telephone or electronic recording; and

- ❑ Relevant information about you that we might obtain from other sources.

We understand that you have the right, power and authority, and have taken all action necessary to provide us with the personal data of your representatives in compliance with applicable laws and regulations and we will collect, use, store, disclose and otherwise process (hereinafter "process") personal data of you and/or your representatives in accordance with this notice.

Uses of your personal data

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

- ❑ to meet our legal obligations as a service provider and perform our obligations and exercise our rights under our terms of business. For example, we may use your personal data to communicate to you or to comply with certain anti-money laundering and compliance requirements.

We are entitled to use your personal data in these ways because:

- ❑ we have legal and regulatory obligations that we must discharge;
- ❑ we may need to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- ❑ the use of your personal data as described may be 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 administer and manage the operation of our business;
  - ensuring a consistent approach to the management of the agreed services;
  - maintaining compliance with internal policies and procedures; or
  - being able to contact you.

Disclosure of your information to third parties

No personal data will be disclosed to third parties except in the following circumstances (to the extent applicable):

- ❑ for compliance with applicable laws, or as required by law of relevant government or administrative authority and then, to the extent reasonably possible, only subject to customary undertakings of confidentiality;
- ❑ in connection with legal proceedings or otherwise to assert and protect our legal interests;

- as part of a corporate transaction with a successor or affiliate entity; or
- to third party service providers, outside counsel, auditors, and other independent professionals in connection with the services and the purposes as described in this notice.

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 individuals operating outside of the EEA who work for our affiliates or for one of our suppliers. For example, we may transfer certain personal data to Hong Kong, which is the location of our head office and to India, which is the main location of our IT department.

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 deemed adequate by the European Commission to providing an equivalent level of data protection to that which exists within the EU;
- the recipient might have signed a data transfer agreement based on "standard contractual clauses" approved by the European Commission, obliging them to comply with data protection laws; or

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 laws.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the "Contacting us" section below.

Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your personal data – 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.

For these reasons, except in cases where this is not permitted, it is our policy to hold your personal data for a minimum period of 7 years following the cessation of the relationship with CLSA.

Your rights

You have 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 or obliged 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., There may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled or obliged to continue processing your personal data; 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.

Contacting us

Nothing in this notice is intended to limit or override the scope of any other consent to disclose separately given by a party to any other party (including pursuant to a separate agreement or any other protocols). Any agreement between the parties to maintain confidentiality of information contained in any non-disclosure, confidentiality or other agreement shall continue to apply in full force and effect. In the event of conflict, the terms set out in this notice shall prevail only to the extent necessary for the parties to comply with applicable law and regulation.

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 via your CITICS Europe contact or directly via gdpr@clsa.com.

You can find out more information about your rights by contacting the data protection regulator in your jurisdiction, 'Autoriteit persoonsgegevens' (Dutch Data Protection Authority), or by searching their website at https://www.autoriteitpersoonsgegevens.nl/.