

ALPHAGREP UK LIMITED

PRIVACY NOTICE

AlphaGrep UK Limited (“**AlphaGrep**” and “**we**”) is committed to protecting the privacy and security of your personal information as far as possible. This privacy notice is designed to give you information about:

- a. the types of personal data we may process about you;
- b. the purposes and legal basis for any processing;
- c. the persons/organisations that we may share any personal data with;
- d. your rights in respect of the personal data we hold; and
- e. the period for which any personal data will be stored.

This privacy notice is in addition to any separate annual privacy disclosures that we may send you under applicable privacy law. It is important that you read this notice so that you are aware of how and why we are using your personal data and what safeguards are in place to protect it.

WHAT INFORMATION DO WE PROCESS ABOUT YOU?

We handle the following categories of personal data about our counterparties and candidates:

- a. personal information such as name and contact details (e.g. addresses, telephone numbers, email addresses);
- b. other personal information such as your age, date of birth and marital status;
- c. information related to your occupation, such as your job title and CV;
- d. in the case of candidates, pay and financial information such as salary, bonus amounts;
- e. unique identifiers such as your government-issued social security number, national insurance number, tax file number, IP address and information related to that IP address;
- f. recruitment and professional information such as application forms, CVs, academic and training-related information, records/results of any pre-employment checks (including credit and fraud checks), references, etc.

WHAT IS THE LEGAL BASIS FOR PROCESSING YOUR PERSONAL INFORMATION?

We only process any personal data about you where the processing can be legally justified. This will be where:

- a. the processing is necessary in order to comply with our contractual obligations with our clients or our service providers, or to take steps enabling us to enter such contractual obligations;
- b. the processing is necessary in order to comply with a legal obligation to which we are subject;
- c. the processing is necessary for our legitimate interests (or those of a third party), provided your interests and fundamental rights do not override those interests. In particular, we will rely on our legitimate interest in processing information for the purpose of recruitment processes and decisions. Please contact us for further information on how we balance our legitimate interests with your own interests as a data subject.

HOW DO WE COLLECT THIS INFORMATION?



We may collect personal information from you when you use our website, when you (or any entity you represent) enter into a contractual relationship with us, including, for example, as a service provider, contractor, employee or investor, or otherwise engage in communication with us. Accordingly, we collect information about you from a variety of sources, which may include:

- a. any documents submitted to us, including any application forms;
- b. our communication or correspondence with you, such as when you contact us by letter, telephone, email or any other means of electronic or personal communication;
- c. your use of our website (including by use of cookies);
- d. your use of the Guest Wi-Fi services on your personal device(s) at our offices; or
- e. third parties, in connection with potential employment or other prospective contractual engagements.

Please note that, in accordance with applicable laws and regulations, we may record (i) calls made on certain employees' landlines and mobile telephone lines; and (ii) virtual meetings/conversations via virtual conferencing platforms.

HOW IS YOUR INFORMATION USED?

We may process personal data about you for the following main purposes:

- recruitment and selection;
- provide our products or services;
- establish and manage a business relationship;
- internal record-keeping purposes to enable us to maintain an audit trail in respect of approvals of decisions, voting and any internal surveys;
- compliance with applicable laws and regulations, relevant industry standards and policies;
- enabling us to have contact details for our service providers and service providers of our clients;
- managing and safeguarding our management, IT and communications systems (including to prevent misuse); and
- performing workforce analysis, project management and planning.

WITH WHOM MIGHT WE SHARE YOUR INFORMATION?

We may share your information internally within AlphaGrep and its group companies, with our business associates, third-party business partners, (sub)contractors and other third parties for the purposes set out below:

- a. *General:* Within AlphaGrep and to our third-party service providers: We may disclose your personal information to third parties, including, but not limited to, our affiliates and other AlphaGrep group companies, (sub)contractors, recruiters, agents and any person who provides professional, legal, compliance, tax or accounting advice or other services to the Firm. All such third parties are required to maintain the confidentiality of the Firm who have a need for such information to the extent they receive it. You hereby consent to the transfer of your personal information to recipients as described in this Privacy Notice. You may withdraw your consent at any time.
- b. *UK and EU Data Subjects:* When you are based in the UK or Europe, personal information collected from you, including via this website, may be transferred to certain recipients located outside of Europe (including in India and the United States) that may not provide a similar or adequate level of protection compared to that provided by the UK or countries in Europe. You hereby consent to

the transfer of your personal information to recipients as described in this Privacy Notice that are located outside of the UK and Europe. You may withdraw your consent at any time.

- c. Legal reasons: We may also disclose your personal information or any portions thereof (a) as required by, or to comply with, applicable law, regulation, court process or other statutory requirement; and (b) to respond to requests from any regulatory, supervisory or governmental authorities.

WHEN MIGHT WE TRANSFER YOUR INFORMATION OVERSEAS?

AlphaGrep's group entities and their respective service providers are international. Accordingly, for any of the purposes outlined above we may transfer certain personal data outside the UK. This may be to countries which do not provide the same level of protection as the laws of the UK. However, we have put in place appropriate contractual protections to protect your personal data using model clauses approved by the European Commission.

HOW LONG DO WE KEEP HOLD OF YOUR INFORMATION?

Notwithstanding anything herein to the contrary, AlphaGrep may retain your personal data as necessary for the provision of the services, for internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements. The criteria used to determine the retention periods include:

- a. the type of personal data collected;
- b. how long the personal data is needed to provide the services and operate the business; and
- c. whether we are subject to a legal, contractual or similar obligation to retain the data (e.g. data required to be retained for the purposes of a dispute resolution and/or litigation, mandatory data retention laws and regulations, government orders to preserve data relevant to an investigation etc.).

YOUR RIGHTS

Subject to certain conditions, you may be able to exercise rights under data protection law. For further information on these rights please contact the Information Commissioner's Office (your national data protection regulator). We have provided a summary below. If you wish to exercise these rights please contact us using the details set out in the Contact section below.

The right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

The right of access. You have the right to obtain access to your information (if we're processing it), and certain other information (similar to that provided in this Privacy Notice). This is so you are aware and can check that we're using your information in accordance with data protection law.

The right to restrict processing. You have rights to 'block' or suppress further use of your information.

The right to object to processing. You have the right to object to certain types of processing.

The right to data portability. You have rights to obtain and reuse your information for your own purposes across different services, for which we shall provide you with your information in a useful format. This is not a general right however and there are exceptions.

The right to rectification. You are entitled to have your information corrected if it is inaccurate or incomplete. You can request that we rectify any errors in the information that we hold by getting in touch with us using the details set out below.

The right to erasure. This is also known as ‘the right to be forgotten’ and, in simple terms, enables you to request the deletion or removal of your information that we hold by writing to us using the contact details set out below

The right to withdraw consent. If you have given your consent to anything we do with your information (i.e. we rely on consent as a legal basis for processing your information), you have the right to withdraw your consent at any time (although if you do so, it does not mean that anything we have done with your personal data with your consent up to that point is unlawful).

The right to lodge a complaint. You have the right to lodge a complaint about the way we handle or process your information with your national data protection regulator, which in the UK is the Information Commissioner’s Office (see details below).

CONTACT US

If you have any questions about this privacy notice, or our privacy-related practices, you can contact: managementAGUK@alpha-grep.com

If you have any concerns about our use of your information and are based within the UK, you also have the right to make a complaint to the Information Commissioner. For further instructions, please visit <https://ico.org.uk>

If you have any concerns about our use of your information and are based within the European Economic Area (EEA), you also have the right to make a complaint to a national data protection authority. For a current list of EEA authorities and the relevant contact details, please visit <https://ec.europa.eu>.

This privacy notice may be amended from time to time without notice, in which case the date of this privacy notice will be revised. If our privacy notice changes in any way, we will upload the latest version on our website.