

Panmure Gordon

PANMURE GORDON (UK) LIMITED

PRIVCY POLICY

OCTOBER 2020

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This privacy notice details Panmure Gordon's privacy policy relating to personal information that we collect, create, use and share when you are using our services. It explains what personal data we hold, what we do with that data and how long we keep it for. Your privacy is important to us, and we are committed to protecting and safeguarding your data privacy rights.

Last updated

This privacy notice was last updated on 1 October 2020.

We will update this Notice from time to time and you should review it whenever you visit our website or before providing us with any personal data about yourself.

Who we are

Panmure Gordon is a merchant bank providing independent advice, research, solutions and execution services to UK growth and mid-cap corporates and investment companies. For the purpose of the General Data Protection Regulation (Regulation (EU) 2016/679) ("the GDPR"), Panmure Gordon is a data controller in respect of any personal data we collect.

How we collect your personal data

We will only collect and use your personal data where we have legitimate business reasons to do so. We may obtain personal data from you to provide you a service or when we provide a service to one of our institutional clients, when you contact us or visit our offices, including when you call us, get in touch with us via our website, or when you or your organisation correspond with us using any means of communication. This includes personal data provided to us:

- in regard to services we provide;
- from third parties when conducting compliance checks;
- when you contact us with a question or enquiry via our website or by calling our office;
- when you provide our staff with business cards or contact details;
- if you deal with us when we are providing services to one of our clients;
- when we receive referrals from other employees, clients or suppliers;
- when you make a complaint;
- when you deal with us in order to provide us with goods or services;
- when you contact us about employment with Panmure Gordon;
- when staff give us your details as an emergency contact; or
- when candidates give us your details as a referee.

We may also collect your data when we search websites where you have posted your data to be found in relation to business opportunities. We will of course let you know at the earliest opportunity when we have gathered your data in this manner.

The personal data we collect

We collect personal data in order to provide the best possible service we can or to maintain good relationships. We only collect the data we need and we will ensure we have appropriate physical and technological security measures to protect your personal data.

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For clients using our services or suppliers whose services we use, depending on the relevant circumstances and applicable local laws and requirements, we may collect some or all of the following information: name, title, email address, postal address, telephone numbers and other contact numbers, nationality, country of birth, place of birth, proof of identification, passport details, bank details and proof of address. We may also hold extra information that someone in your organisation has chosen to tell us, where we have a good reason to hold it.

What we use your information for

Panmure Gordon collects and processes your personal data for legitimate Business Management and People Team purposes including:

- conducting 'Know Your Customer' activities, including anti-money laundering checks;
- managing the financial relationships with our clients;
- administering our clients' products and services;
- processing transactions;
- processing instructions from clients;
- in connection with legal and dispute management;
- for compliance with legal, regulatory and tax reporting obligations;
- releasing your personal information to regulatory or law enforcement agencies, if they require us to do so by law for the prevention, detection and investigation of crimes;
- to market our related products and services directly to you, and advise you of any updates to our services. Where we do so you will be able to unsubscribe at any time from receiving any further communications from us;
- to contact you from time to time for market research purposes. We may contact you by email, phone or mail. We may use the information to customise the website according to your interests;
- internal record-keeping;
- contacting you in an emergency involving a member of staff;
- contacting you to take up a reference for a potential employee;
- we may use the information to improve our services to you; or
- to fulfil contractual obligations with our clients.

We may use your personal data for these purposes if it is necessary for the formation or performance of a contract, for the fulfilment of statutory or other legal obligations, or where we deem it to be necessary for our legitimate interests or for mutually beneficial legitimate interests. Our legitimate interests are explained a little further down this notice

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

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Sharing your personal data

Where appropriate and in accordance with local laws and requirements, we may share your personal data with:

- tax, audit, or other authorities, when we consider in good faith that the law or other regulation requires us to share this data (for example, because of a request by a tax authority or in connection with any anticipated litigation);
- third party service providers who perform functions on our behalf (including external consultants, business associates and professional advisers such as lawyers, auditors and accountants, technical support functions and IT consultants carrying out testing and development work on our business technology systems);
- third party outsourced IT and document storage providers where we have an appropriate processing agreement (or similar protections) in place; and
- marketing technology platforms and suppliers.

If Panmure Gordon acquires, merges with or is acquired by another business or company in the future, (or is in meaningful discussions about such a possibility) we may share your personal data with the other business or company, subject to appropriate assurances as to the protection of your data privacy.

Your Rights

You have individual rights under the GDPR. You can exercise any of these rights by contacting us using our contact details at the end of this notice or by any other means. Your rights are listed and explained below. You have:

The right to be informed – you have the right to be informed of what we do with your data. The detail of what we do is in this privacy notice.

The right of access – you have the right to ask us to confirm what information we hold about you. You can exercise this right by submitting a Data Subject Access Request. We may ask you to verify your identity and request more information about your request. We will respond to any request to access your data one month of receiving the request unless we require an extension. We will inform you within one month of receiving your subject access request if we need to extend the response time, along with an explanation for the delay.

The right to rectification – you have the right to correct inaccurate personal data and complete incomplete personal data held by us. We may ask you to verify your identity and for more information about your request.

The right to erasure – You have the right to have your personal data deleted (right to be forgotten) where there is no good reason for us to continue processing it, where you have successfully exercised your right to object to processing, where we may have processed you information unlawfully or where we are required to erase your personal data to comply with local law. We will make every reasonable effort to remove your personal data, however, this may not always be possible if we need to continue to retain your data for:

- a) exercising the right of freedom of expression and information;
- b) complying with a legal obligation under EU or member state law;
- c) the performance of a task carried out in the public interest;
- d) exercising official authority vested in the data controller;

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- e) public health reasons consistent with the exceptions for processing sensitive personal data such as health information;
- f) archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, under certain circumstances;
- g) the establishment, exercise, or defense of legal claims.

We may ask you to verify your identity and for more information about your request. We will respond to any request to delete your data within one month and let you know the outcome of your request.

The right to restrict processing – you have the right to ask us to stop processing your data. Where consent has been given to process your data, you can withdraw that consent at any time by contacting us using the details at the bottom of this notice. You can raise any concerns to the processing or use of your personal data by us either to us or to the appropriate data protection authority.

The right to data portability – you have the right to have the personal data you have given us transferred to another company and we will make every reasonable effort to comply with your request

The right to object – you have the right to object to us processing your personal data where we do so under legitimate interests or to enable us to perform a task in the public interest or exercise official authority or to send you direct marketing materials or for scientific, historical, research or statistical purposes. The “legitimate interests” and “direct marketing” categories above are the ones most likely to apply to our Candidates, Clients and Suppliers. If your objection relates to us processing your personal data because we deem it necessary for your legitimate interests, we must act on your objection by ceasing the activity in question unless we can show that we have compelling legitimate grounds for processing which overrides your interests or we are processing your data for the establishment, exercise or defence of a legal claim.

Rights in relation to automated decision making and profiling – Automated individual decision-making is a decision made by automated means without any human involvement, such as a recruitment aptitude test which uses pre-programmed algorithms and criteria. Panmure Gordon do not use any automated decision making tools. Profiling is where we use the information we have on you to classify you into different groups or sectors, using algorithms and machine-learning. This analysis identifies links between different behaviours and characteristics to create profiles for individuals. Panmure Gordon does not use any profiling techniques. However, if you think we are doing so you have the right to ask us to explain and to ask us to stop doing so.

Transfer of data outside the EU?

Normally your data will not be transferred to a country or territory outside the EEA unless that country or territory ensures an adequate level of protection or the appropriate safeguards are in place to guard your rights and freedoms.

Retention

It is our policy only to keep records of your personal data for as long as required under the legal obligations of delivering a service to you, or as required by relevant authorities or other legislation, whichever requirement is longer after which it will be erased from our systems and any paperwork will be destroyed.

To determine the appropriate retention period for personal data, we consider the amount, nature,

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and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Our retention policies are currently as follows:

- If you are a client or a supplier we may, for regulatory reasons or to settle a dispute, keep your data for six years after the end of the engagement with us;
- If you have contacted us via our website or sent us an email and we do not engage in a professional relationship with you, we will destroy your data after two years or sooner;
- If we are recruiting and you send us your CV or if we are not currently recruiting but are interested in your profile we may keep your cv and personal details for a period of one year, after which your data in this respect will be deleted.

Legitimate interests

The GDPR states (in Article 6(1)(f)) that we can process your data where it is necessary for the purposes of the legitimate interests pursued by us except where such interests are overridden by your interests or fundamental rights or freedoms.

Our legitimate interests explained – Panmure Gordon think it's reasonable to expect that if we have had a professional relationship with you or you have contacted us about a job or we find that you are looking for employment or you have posted your professional information on a job board or professional networking site, or we have been given your name as an emergency contact or as a referee, you are happy for us to use your personal data to contact you for a relevant reason. If you do not want any further contact with us you can ask us to stop by contacting us using the details at the end of this Privacy Notice.

Cookies

When someone visits our website we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. We do not collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

You can use your browser settings to accept or reject new Cookies and to delete existing Cookies. You can also set your browser to notify you each time new Cookies are placed on your computer or other device. You can find more detailed information about how you can manage Cookies at the [All About Cookies](#) and [Your Online Choices](#) websites.

By using this website, you declare that you agree to the processing of data collected about you by Google in the manner described above, and for the purposes described above. You can counteract the saving and collection of data with a plugin for your browser, available [here](#).

Security

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to

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safeguard and secure the information we collect. Our servers are all hosted from datacentres within the EEA which are ISO27001 certified.

Links to other websites and social media

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide while visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Contact Us

To exercise any relevant rights, queries or complaints please contact us by one of the following means:

By Phone: +44 (0)20 7886 2500

By Post:

Panmure Gordon
One New Change
London
EC4M 9AF

Email: compliance@panmure.com

Contact your local supervisory authority

If you wish to make a complaint then you can contact your local supervisory authority. If you are in the UK your local Supervisory Authority is the Information Commissioners Office (ICO) who can be contacted in the following ways:

By Phone: +44 (0)303 123 1113

By Post:

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Other contact options can be found on the ICO website at <https://ico.org.uk/global/contact-us>.

Supervisory Authorities for other countries can be found on the European Commissioners website at https://ec.europa.eu/info/index_en.