

Stifel Europe Limited **Privacy Policy**

Our Privacy Policy

Stifel Europe Limited (“Stifel” or “Company”) takes the privacy and protection of client information very seriously. Stifel is therefore committed to maintaining the confidentiality, integrity, and security of its current, prospective and former clients’ non-public personal information. Please read the following Privacy Policy and Notice to understand how we use and protect the information that you provide to us.

This **Privacy Policy** will therefore explain what data is collected, why it is collected, how the collected data is used and your options and rights regarding the collection of your personal data.

In the course of providing its clients with products and services, and certain of its service providers may obtain non-public personal information about its clients. This information may come from sources such as trading account applications and other forms, from other written, electronic or verbal correspondence, from client transactions, from third parties such as financial adviser or consultant, and/or from information captured on applicable website.

As a matter of policy, Stifel does not disclose any non-public personal information provided by its clients or gathered by Stifel to non-affiliated third parties, except as required or permitted by law or for Stifel’s everyday business purposes, such as to process transactions or KYC a client strictly in relation to the services we provide. As is common in the industry, non-affiliated companies may from time to time be used to provide certain services, such as reports, trading account statements and other information, conducting research on client satisfaction. Stifel may also retain non-affiliated companies to market its products, and may enter into joint business arrangements with them and other companies. These companies may have access to client personal information, but are permitted to use the information solely to provide the specific service or as otherwise permitted by law. Stifel may also provide client personal information to their financial adviser or consultant.

Stifel reserves the right to disclose or report personal or trading account information to non-affiliated third parties in circumstances where Stifel believes in good faith that disclosure is required under law, to cooperate with regulators or law enforcement authorities and to protect its rights or property. Moreover, Stifel may disclose information about a client to a non-affiliated third party at their request or if the client consents in writing to the disclosure.

Stifel may share client information with its affiliates in connection with reviewing a client personal data which we hold, and subject to applicable law may provide a client with information about products and services that Stifel believes may be of interest to the client. The information that Stifel may share may include, for example, information about Stifel’s transactions with a client, their participation in investments/ deals, information captured on applicable website, or other data about their trading accounts, subject to applicable law.

Stifel takes seriously the obligation to safeguard a client’s non-public personal information. In addition to this policy, Stifel has implemented procedures that are designed to restrict access to a client’s non-public personal information to its personnel who need to know that information to perform their jobs, such as

reviewing an existing client's trading account or notifying a client of new products and services. Physical, electronic, and procedural safeguards are in place to guard a client's non-public personal information.

The website maintained by Stifel or its service providers may use a variety of technologies to collect information that help Stifel and its service providers understand how the website is used. Information collected from a client's web browser (including "cookies") allow the website to recognise a client's web browser and help to personalise and improve a client's user experience and enhance navigation of the website. In addition, Stifel or certain of its service providers may use third parties to place advertisements for Stifel products on other website, including banner advertisements, as well as to ensure that messages displayed on Stifel's website are relevant to its clients. Such third parties may collect anonymous information through the use of cookies, action tags (such as web beacons) and/or container tags. The information these third parties collect is generally to technical and web navigation information, such as a client's IP address, web pages visited and browser type, and does not include personally identifiable information such as name, address, phone number or email address. If a client is a registered user of Stifel's website, Stifel or its service providers or third party firms engaged by Stifel or its service providers may collect or share the information a client submits to us, which may include personally identifiable information. This information can be useful to Stifel when assessing and offering services and website features for a client. A client can change their cookie preferences by changing the setting on their web browser to delete or reject cookies. If a client deletes or rejects cookies, some website pages may not function properly.

Privacy notice

This Privacy Notice applies to Stifel Europe Limited unless stated otherwise. "We", "our", "us", "Company". or "Stifel" means Stifel Europe Limited which includes its legal entities, branches, and subsidiaries.

For the purposes of data protection law, we are a data controller in respect of your personal data. We collect and use your personal data and where applicable this may include information related to your spouse/partner, directors, partners and owners (your "representatives"). Stifel is responsible for ensuring that it uses your personal data in compliance with data protection law.

Stifel considers customer privacy to be a fundamental aspect of its relationship with clients. Stifel has developed policies that are designed to protect its clients' confidentiality, while allowing their needs to be served.

This notice applies to any personal data we receive from you, create or obtain from other sources and explains how it will be used by us.

Personal data collection – what data is being collected?

Information you give us about you and your representatives

This is personal information about you and any other individuals (such as representatives or advisors) that you give us by filling in forms or by corresponding with us by phone, e-mail or otherwise. The information you give us may include your, and your representatives', name, address, e-mail address and phone number, financial information, and identification records (including your nationality).

You should ensure that in respect of any information you provide us with, which does not relate to you (for example, information about your representatives), you have obtained the necessary consent in order to disclose such information.

Information we collect or generate about you and your representatives

We sometimes record telephone conversations and monitor email communications to resolve complaints, improve our service and in order to comply with our legal and regulatory requirements. The information we capture in this way may include your name, address, e-mail address and phone number, financial information, and identification records (including your nationality).

We generate data to improve our service and to manage and take decisions about the services we provide. The information we capture in this way may include your name, address, e-mail address and phone number, financial information, and identification records (including your nationality).

In the course of operating our website, we may collect and process the following information about you:

1. Information that you provide by filling in forms on our website at www.stifeleurope.com. The personal information you provide in this way may include your full name, title, telephone number and email address.
2. Information about when you use our services. We use various technologies to collect and store information when you visit our website. We may, for example, collect information about the type of device you use to access the website, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our website, the web pages and the search terms you enter on our website.
3. Information when you report a problem with our website.
4. Details of your visits to our website and the resources that you access, for example we may collect information about the content you view and features you access on our website, the web pages and the search terms you enter on our website.

Information we may receive from other sources

Verifying your identity – We may use information provided by third parties (e.g. fraud prevention agencies) when verifying your identity and when carrying out anti money laundering checks. Such information may include some details about any criminal convictions and any allegations regarding criminal activity that relate to you, as well as details of your status as a politically exposed person. It may also include identification records (including your nationality).

Intermediaries – We may receive information from dealers, other brokers and clearing agents for the purposes of entering in to and administering your agreement. This may include your name, address, e-mail address and phone number, financial information, and identification records.

Publicly available information – We may obtain information about you from publicly available databases, such as social media sites. The information we capture in this way may include your name, employer, email address and phone number.

How will the information be used?

Your personal data may be used by us in the following ways:

Background checks:

- To verify your identity as part of our client 'KYC' onboarding process.
- In order to detect and prevent fraud and money laundering.
- In order to identify politically exposed persons.

Products & Services

- To ensure content from our website is presented in the most effective way for you and your computer.
- In order to provide you with information, products or services you may request from us.
- To record and monitor your use of our website or our other online services for our business purposes which may include analysis of usage and measurement of site performance.
- Where you have provided your consent to do so, to send promotional information about our products and services via the methods you specify (for example by email or post).

What is the legal basis for processing the data?

We process your personal data pursuant to the following legal bases:

- In order to perform our obligations under our agreement with you.
- To comply with our legal and regulatory obligations.
- To establish, exercise or defend our legal rights and / or for the purpose of (or in connection with) legal proceedings.
- For the prevention of fraud.
- The use of your personal data as described is necessary for our legitimate business interests such as:
 - To enable us to improve the website and deliver a better and more personalised service to you.
 - Enforcing the terms and conditions of any agreement we have with our clients.
 - The recovery of outstanding debts existing under an agreement with our clients.
 - To send promotional information about our products and services via the methods you indicate where you have provided consent to do so.

Will the data be shared with any third parties?

Stifel does not disclose any personal information provided by its clients or gathered by Stifel to non-affiliated third parties, except as required or permitted by law or for Stifel's everyday business purposes, such as to process transactions or our KYC procedure. We may disclose your personal data within the Company and to third party service providers in the circumstances described below:

- To ensure the delivery of products or services to our clients.
- To ensure the safety and security of our data.
- To assess compliance with applicable laws, rules and regulations, and internal policies and procedures across our business.
- For internal research and statistical analysis purposes.

We will take necessary steps to ensure that the personal data is accessed only by personnel that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of the Stifel:

- In order to enforce or apply the terms of use and other agreements our clients have with us.
- In relation to an agreement with us.
- If we sell any of our business services or products, in which case we may disclose your personal data to the prospective buyer for due diligence purposes.
- To third party agents or for the purposes of providing services to us.

Please note that these third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice.

We may also share your personal data outside of the Company to the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation (including disclosures made to regulators and Companies House), and to establish, exercise or defend our legal rights.

Transfer of personal data outside the European Economic Area

The information you provide to us will be transferred to and stored on our secure servers in the European Economic Area (“EEA”). However, from time to time, your personal data may be transferred to, stored in, or accessed from a destination outside the EEA. It may also be processed by staff operating outside of the EEA who work in the Company or for one of our suppliers.

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 recipient of the data might be a signatory to Company binding corporate rules.
- The country that we send the data to might be approved by the European Commission or a relevant data protection authority.
- The recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data or
- Where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

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 law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data or binding corporate rules) by contacting us in accordance with the “Contact us” section below.

How long will the data be stored for?

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

- Our internal policies – imposing the period for which we hold personal data.
- Legal obligations – laws or regulation may set a minimum period for which we have to store your personal data.

Your rights

Under the General Data Protection Regulation, you have a number of important rights. In summary, those include rights to:

- Obtain information regarding the processing of your personal data and access to the personal data which we retain about you.
- 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.
- Require us to correct any mistakes in your personal data which we hold.
- 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.
- Receive the personal data concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations (please note that this right only applies to personal data which you have provided to us).
- 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 to retain it though.
- Request that we restrict our processing of your personal data in certain circumstances. Please note that there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request.
- Object to our processing of your personal data where we process your personal data pursuant to our legitimate business interests. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to refuse that request.
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you. Please note that there may be circumstances where you object to us conducting automated decision making but we are legally entitled to refuse that request.
- Object at any time to the processing of your personal data for direct marketing purposes.
- Raise a complaint with the data protection regulator (details of which are provided below) to claim compensation 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 “Contact us” section.

For further information on each of these rights, including the circumstances in which they apply, see the Guidance on individual’s rights under the General Data Protection Regulation.

Changes to our privacy policy

This policy may be subject to update in the future as a result in changes to legislation and business practices. Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.