

Share Portal Account and Employee Portals – Privacy Notice

Last updated: June 2021

We understand how important your personal data is and are committed to protecting and respecting your privacy.

'Personal Data' means any information relating to or which identifies you. This can include items such as your name, address, phone number, identification numbers (such as an account number or your national insurance number), location data or online identifiers. Personal data can be held electronically or in certain paper records.

The UK General Data Protection Regulation (GDPR) regulates the processing of personal data. The UK GDPR seeks to protect your rights to your personal data by setting out, amongst other things, the conditions under which the processing of personal data is lawful, the rights of data subjects and the standards that organisations handling personal data must adopt. This Privacy Notice is issued in compliance with UK GDPR and seeks to explain:

1. Who we are;
2. Websites covered by this Privacy Notice;
3. How we collect your personal data;
4. Why we collect your personal data;
5. How long we hold the personal data ;
6. The conditions under which we can share it with others;
7. Overseas processing;
8. How we keep your personal data secure;
9. Your personal data rights and how to exercise them;
10. Useful information;
11. EU GDPR and
12. Any further questions.

1. Who we are

Equiniti Limited (EL) is one company within the Equiniti Group. Our main business is administration services. Our registered address is Aspect House, Spencer Road, Lancing, West Sussex, BN99 6DA and our ICO registration number is: Z1028602.

EL is a **'Data Controller'**. This means that we are responsible for deciding how and why we hold and use personal data about you.

In this Privacy Notice, 'we', 'us' and 'our' will always mean EL, as Data Controller.

If you have any questions about our accessing our portal services, please contact us:

Employee portals - 0371 384 2465 / +44 121 415 0265

Share Portal Account - 0371-384-2464 from the UK, +44 371-384-2464 if you are outside of the UK.

2. Websites covered by this Privacy Notice

- abrdrn Share Portal
- Share Portal Account
- Employee Schemes Portal
- Equiniti Premier Portal

IMPORTANT NOTE re Products and Services accessed via applicable websites

This Privacy Notice relates only to the webpages that you log into as part of our Portal services listed above and relates to your online account used to access a range of Products and Services offered by the companies you have Products with or request Services from. These Products and Services each have their own privacy notices, issued by the company who offering the Product or Service (as they are the data controller for the Product or Service). An example of this is shown below:

- Equiniti Financial Services Limited offer the Dividend Re-Investment Plans (DRIPs), Corporate Nominee and Global products and Sharedealing services.
- Ordinary shares (with a certificate), you will need to see the Privacy Notice of the Corporate Issuer.
- Equiniti Share Plan Trustees Limited offer the Share Incentive Plan (SIP) and related dealing services.
- SAYE products are offered by your employer and a savings carrier.

<p>This Privacy Notice relates to our Portal websites and your Portal Account only and which is offered by Equiniti Limited.</p>

3. How we collect your personal data

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

Information you provide to us

- By using our website(s) and related mobile device apps;
- By corresponding with us by post, phone, e-mail, live-chat or otherwise;
- Application and registration forms/identification documentation; and
- Entering competitions, promotions or surveys.

Information we collect about you

- Information about how you logged on and off of our website(s), including your IP address, information about your visit, your browsing history, and how you use our website. This will include the capture of your location information – please see our Cookie Policy for further information on this;
- Information on what you view, click on and access in and through our marketing emails. This may include the geographic location of the device you have used – **please see our cookie policy for further information on this;**
- Images and voice recordings of your communications with us for quality control, training, security and regulatory purposes, but these can also capture your location i.e. use of home landline number; and
- If you contact us via social media, we may collect details from your social media account.

Information we receive from third parties

- As part of our identity and financial crime checking procedures;
- From third parties when you have instructed or agreed for them to pass information to us, such as:
 - Your employer if you are using our services as part of or following an employee benefit scheme;
 - Your broker, agent, Trustee or Investment Company and companies that introduce you to us;
- From online advertising networks (for example Google) through whom we place advertisements. The information we obtain varies from network to network. It summarises the actions of lots of people and so does not enable us to identify you individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It can also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for 'settings' and 'Do Not Track' options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your setting to block third party cookies in particular. We do not control the information on you that such networks obtain, or the technology they use to do so.

Special types of data – The law and other regulations treat some types of personal information as special. We will only collect and use this information if the law allows us to do so. Special types of data are:

- Criminal convictions and offences;
- Genetic and bio-metric data;
- Health data including gender;
- Racial or ethnic origin;
- Religious or philosophical beliefs; and
- Trade union membership.

Keeping your personal data up to date

The personal data we hold may include your name, postal address, email address and phone number, date of birth, financial information (relating to the Products and Services you link to your Portal account) and employment details (when appropriate) to enable us to contact you and respond to your enquiries as well as provide you with your Portal Accounts.

It is important to us that the personal data we hold about you remains accurate and up to date at all times, but we need your help in doing this. Please let us know as soon as anything needs updating or correcting.

Other people's personal data

The information you give us, or that we collect through your use of our services, may contain your or another person's personal data. If you provide us with information about another person, you confirm that they have appointed you to act for them, they consent to you providing their personal data to us and any processing of their personal data and that you have informed them of our identity and the purpose for which their personal data will be processed – as set out in this Privacy Notice.

4. Why we collect your personal data

In the table below we demonstrate why and how we use your personal data as well as providing the legal reasons which we rely upon.

Under Data Protection legislation we must always have a legal reason for processing your personal data. One of the legal reasons is when we use your personal data for our legitimate interests, this is usually when we have a business reason. However, we must always ensure that we take your interests into consideration too, and ensure that the use is fairly balanced. We tell you below when we rely on legitimate interests and what our legitimate interests are.

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
<p>Provision of services, including the administration and management of customer records</p>	<ul style="list-style-type: none"> ○ To manage and operate your online Portal Account with us to facilitate the provision of shareholder and financial services, this includes retaining records of your instructions and telephone calls and keeping your online account records up to date. ○ To respond to any data rights that you invoke. ○ To complete any transaction or instructions that you provide us, and any legal obligations we have in relation to the transactions / instructions. ○ To keep our websites and portals secure and permit you safe access to our services. ○ Enforcing or obtaining a settlement of debts owed to us 	<p>With your consent.</p> <p>The performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.</p> <p>To comply with legal requirement placed upon us, such as Data Protection legislation</p> <p>Our legitimate interests, such as the proper administration of our service and business, for example:</p> <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. ● To meet our regulatory requirements
<p>Marketing our products and services</p>	<ul style="list-style-type: none"> ○ To allow you to participate in interactive features when you choose to do so. ○ To provide you with the information, products and services that you request from us. ○ Identifying if any of our other products or services may be of interest to you and making suggestions and recommendations to you about them. ○ To administer any prize draws that you are offered and elect to enter as an incentive. ○ We can ask you from time to time to confirm or update your choices, such as when there is a change in the law or the structure of our business. <p>IMPORTANT You can withdraw from marketing at any time, please use the unsubscribe button in our emails or contact us using the details noted above.</p>	<p>With your consent.</p> <p>When we have collected your personal data as part of a transaction with us</p> <p>Our legitimate interests, such as the proper administration of our service and business, for example:</p> <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. <p>To meet our regulatory requirements.</p>

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
Improving our products and services	<ul style="list-style-type: none"> ○ To develop and manage our websites and online portals. ○ To identify service improvements and ensure that content is presented in the most effective manner for you and for your device and to study how you and our other customers use our websites and portals. ○ To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which can be based on your activity on our website(s) or the website of another Equiniti Company or third parties' websites. We can do this ourselves or appoint an agency to do this on our behalf. 	<p>With your consent.</p> <p>To comply with legal requirements placed upon us, such as the Data Protection legislation.</p> <p>Our legitimate interests, such as the proper administration of our service and business, for example:</p> <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. <p>Some of this information will be gathered by cookies that you have consented can access your computer.</p> <p>Please see our cookie policy for further information on how to manage cookies.</p>

If you choose not to give personal information

We need to collect personal information required by law or under the terms of service you have elected to use. If you choose not to give us the personal data we need, it can mean that we have to cancel or decline a service that you request or have with us. So that you know what information is optional, we make it clear at the time we collect your personal data.

5. How long we hold the personal data

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data. We will then either securely delete it or anonymise it so that it cannot be linked back to you. We review our retention periods for personal data on a regular basis. You are able to request the closure of your portfolio account at any time.

For full details of our retention policies, please contact us using the contact details noted above and the relevant terms and conditions.

6. The conditions under which we can share your personal data with others

The personal data we hold about you is confidential, and we will only share your personal data to enable us to deliver our websites and portals, examples are as follows:

- At your request, or with your consent; or as necessary to carry out instructions you provide in relation to your navigation from our website to Product links for example for Sharedealing transactions to enable you to have a seamless customer journey.
- Other Equiniti Group companies who help us deliver our products and services, such Equiniti India Private Limited;
- Non-Equiniti entities, in connection with running accounts and services for you, including:
 - Service suppliers to facilitate website, email, IT and administration services;
 - Our professional advisors, for example, our lawyers and technology consultants, when they need it to provide advice to us;
 - Market Research Agencies to measure or understand the effectiveness of advertising we serve to you and others.
 - Credit reference agencies and fraud detection agencies as part of our identification procedures;
 - Fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, can be obtain by contacting the Equiniti Data Protection Officer using the details noted below; and
 - Your Official Receiver or appointed insolvency practitioner if we receive notice of your insolvency, bankruptcy or insolvency proceedings / arrangement

We will only transfer your personal information to trusted third parties who provide sufficient security guarantees and who demonstrate a commitment to compliance with applicable law and this policy. Where third parties are processing personal information on our behalf, they will be required to agree, by contractual means, to process the personal information in accordance with the applicable law. This contract will stipulate, amongst other things, that the third party and its representatives shall act only on our instructions, or as permitted by law.

We are also required to share your personal data with external third parties as follows (but not limited to):

- Regulators and supervisory authorities e.g. Information Commissioner's Office (ICO), Credit Industry Fraud Avoidance System (Cifas) - as part of our legal obligations;
- Where the law requires or permits disclosure, or there is a duty to the public to reveal it;
- When we need to defend or exercise our legal rights or those of a third party;
- Debt collecting, debt chasing or another agent for enforcing payment of monies owed to us;
- Efforts to trace you if we lose contact with you;
- Police and other law enforcement agencies for the prevention and detection of crime and where a valid permission is applicable;
- As a result of a court order or other regulatory instruction; and
- Our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments
- We can transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. At all times, we take steps to ensure your privacy rights continue to be protected as per this Privacy Notice.

7. Overseas Processing

Personal data will be shared with members of the Equiniti Group outside of the UK including Equiniti India Private Limited which is based in India, for the purposes described in this Privacy Notice. For these transfers we utilise Model Clauses recognised by the European Commission.

When we contact you via email or you use our microsites to contact us, one of our service providers uses services outside of the UK. For these transfers, we utilise Model Clauses recognised by the European Commission.

If you would like to obtain a copy of the Model Clauses we use to share personal information within the Equiniti Group or our email service provider, please contact our Data Protection Officer using the details provided in this Privacy Notice.

Please note that information protection laws do vary from country to country. In particular, the law of the country in which you are resident or domiciled may offer a higher standard of protection than the laws in the UK. Whilst we have taken measures to protect your personal data, the transfer to other countries could result in your personal data being available to governments and other authorities in those countries under their laws.

By using our website and portal services you are considered to have accepted international transfer, storing and processing.

8. How we keep your personal data secure

We understand how important your personal data is to you and we take appropriate steps to ensure that it remains secure.

We safeguard your personal data across all our computer systems, networks, websites, and offices as much as possible through appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) and our Information Security policies are aligned to ISO27001, which is an internationally recognised security standard.

We also use secure ways of communicating with you such as when collecting your personal data or providing your account information:

- online through the use of “https” and other security and encryption protocols. This is indicated by a lock icon on the bottom of the web browser, or the address will include the letters https in the top left-hand corner.
- by telephone we will always ask you security questions to confirm your identity before we discuss matters relating to your online portfolio account(s).

Where we have given you (or where you have chosen) a password or unique identifier (PIN) which enables you to access certain parts your account, you are responsible for keeping this password / PIN confidential, along with any username. We will never ask for your full password or PIN, and you must not divulge your full password to us or anyone else. We recommend that any password or PIN you set is not easily guessable, and changed frequently (at least once a month).

Because we cannot guarantee the confidentiality of personal data sent on the internet you should never send your login details via email.

Security concerns

If you ever receive a communication from us by post, email or by phone that you are concerned it is not genuine, please contact us using the contact details in section 1.

You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details.

If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of Get Safe Online, which can be accessed at www.getsafeonline.org.

9. Your personal data rights and how to exercise them

You have rights in respect of the personal data that we hold about you. They include the right to request a copy of the information that we hold about you, to know about any automated decisions that are made about you and to change your marketing preferences at any time. Details about all of your rights are provided below.

Some of these rights are conditional and depend upon why we are processing your personal data. This means that we cannot always be able to respond to your request in the way that you want. For example:

- If you ask us to erase your personal data and we are processing the information because we are required to do so because of a legal requirement, we will not be able to delete your personal data; however,
- If you ask us to erase your personal data and we are processing the information because you provided us with consent (for example as part of a survey response), we will be able to consider and respond to your request.

Your rights	Explanatory detail
The right to be informed about how we use your personal data.	This Privacy Notice provides you with the details on how we use and process your data.
The right of access to a copy of any personal data EFSL processes about you, together with certain additional information.	If you request to see your personal data, your initial request will be free of charge; subsequent requests may attract an administration fee. The additional information includes details of the categories and recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.
The right to request us to rectify or update it.	This will be relevant where the personal data we hold is or has become inaccurate or incomplete, taking into account the purposes of the processing. Please explain why you consider the data inaccurate or incomplete.
The right to request us to erase your personal data in certain circumstances.	The circumstances when erasure can apply include when we no longer need your personal data to meet a lawful basis for processing unless that basis is consent and you withdraw your consent or you object to the processing or the processing is unlawful. However, certain exclusions apply - where the processing is necessary for compliance with a legal obligation or to establish, exercise or defend legal claims.
The right to request us to restrict processing it.	This request can be used to stop us processing your personal data: if you disagree over the accuracy of the personal data until we have verified the data; the reason for processing; or if you wish us to retain your personal data for longer than our retention period, e.g. to establish, exercise or defend a legal claim.
The right to request a copy of your information for data portability purposes.	If you have provided personal data to us under <u>contract</u> or because you <u>consented</u> to the processing and <u>use the data by automated means</u> , then you have the right to instruct us to transmit that personal data to you or another data controller in a machine-readable format.
The right to object to us processing your personal data.	<p>You have a right to object to us processing your data where we are processing it for the purpose of legitimate interests.</p> <p>You can also object to direct marketing communications from us about products, offers, competitions, or services and any profiling that we can perform in relation to direct marketing. You can do this at the point of data collection, through the use of any opt-out functionality on text and emails, via your preference centre or by contacting the helpline service. You can update your marketing preferences at any time through the use of the opt-out functionality.</p> <p>You have the right to withdraw your consent at any time. However, this will not affect the lawfulness of processing before the withdrawal.</p> <p>If you would like to receive the marketing described above, please ensure you have indicated your preferences accordingly.</p>

Your rights	Explanatory detail
Rights related to decisions based solely on automated processing .	Where this processing produces legal effects or significantly affects you, you can object to this processing unless the processing is necessary as part of our contract, or is required by legislation.
Right to lodge a complaint with a supervisory authority.	<p>If you wish to raise a complaint on how we have handled your personal data, please contact our Data Protection team who will investigate the matter and report back to you.</p> <p>If you remain unsatisfied with our response or believe we are not processing your personal data in accordance with the law, you are able to contact the data protection supervisory authority in your country.</p> <p>In the UK, it is the Information Commissioner’s Office (ICO) who regulates Data Controllers compliance with data protection legislation. They can be contacted by email: casework@ico.org.uk; post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; or by telephone: 0303 123 1113.</p>

10. Useful information

10.1 - Children (16 years and under) and Vulnerable Adults

We are committed to the privacy protection of children and vulnerable adults. If you are aged 16 or under, and we need to process your personal data you must obtain the permission of your parent/guardian **before** you share your personal data with us. If we are notified that you are a vulnerable adult we will liaise with your authorised representative, once we are in receipt of the appropriate permissions.

10.2 - Use of ‘cookies’

Cookies are text files placed on your computer to track visitor use of the website and to compile statistical reports on website activity. This helps us to improve our website and deliver a better more personalised service.

You can switch off cookies by setting your browser preferences. However, turning cookies off will result in a loss of functionality when using our website. For more information on how to switch off cookies on your computer, please see the relevant cookie policy for the website you are using. These are typically found in the footer links at the bottom of the page.

10.3 - Links to other websites

Our websites can contain links to other websites run by other organisations, or other Equiniti Group companies. When you are on another website, we encourage you to read their privacy policies as they will take precedence over this Privacy Notice.

Our websites contain links to other websites run by other organisations, or other Equiniti companies. This Privacy Notice applies only to the website noted in section 2 above. When you migrate through to specific products and services or to another website, we encourage you to read the relevant privacy statements as they will take precedence over this Privacy Notice.

We are not responsible for the privacy policies and practices of other sites.

10.4 – Social media, blogs, reviews, and similar services

Any social media posts or comments you make to us (e.g. on our own Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other organisations, and so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and Services on any of our blog, review or user community services will be shared with all other members of that service and the public at large.

You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services

10.5 Changes to this Privacy Notice

We review our use of your personal data regularly. In doing so, we can change what personal data we collect, how we keep it and what we do with it. As a result, we can change this Privacy Notice from time to time to keep it relevant and up to date.

We will endeavour to alert you to these changes so that you can check you are happy with it before proceeding any further. Please look out for notices from us alerting you to these changes, via our websites or other timely communications. If you use our website and see such an alert, please take a moment to ensure that you're happy with any changes.

By continuing to use our products and services, you will be bound by this Privacy Notice.
However, we will also tell you of the changes where required by law to do so.

This policy was issued 30.06.21. If you require copies of previous versions of the EFSL Privacy Notices, please contact the Data Protection Officer using the contact details noted below.

11. EU GDPR

The European Union adopted the European General Data Protection Regulation (EU GDPR) on May 25, 2018 and you are protected by the provisions of the EU GDPR if you are in the EU.

The information within this Privacy Notice meets the EU GDPR requirements, however, you also have the right to lodge a complaint (as per section 9 above) with your relevant data protection supervisory authority.

12. Any further questions about this Privacy Notice

We hope that this Privacy Notice has been helpful in setting out how we handle your personal data and your rights to control it. If you have any questions that remain unanswered, please visit our Customer Privacy Centre or contact our Data Protection Officer:

- **Online** - at <https://privacy.equiniti.com> where you will find general information about your rights and how Equiniti safeguards your data;
- **By email** - at DPO@equiniti.com;
- **By post** - at Data Protection Officer, Equiniti, Highdown House, YeomanWay, Worthing, BN99 3HH; or
- **By telephone** - UK: 0371-384-2464 from the UK, +44 371-384-2464
Lines are open 8.30am to 5.30pm (UK time), Monday to Friday (excluding public holidays in England and Wales).