



PRIVACY NOTICE
International Payment Service

1. What is this notice?

At Link Group (“Link”), we collect personal information about you and are committed to protecting this information and your privacy. Set out below is an explanation of how we use, collect and safeguard your personal information. Following on from this notice, the clause set out in the schedule to this notice will replace the existing provisions of clause 9 of the terms and conditions of the international payment service (the “Service”) we provide to you. Capitalised terms in this processing notice have the meaning given to them in the terms and conditions of the Service (the “Terms and Conditions”).

2. What personal information do we collect?

As part of providing the Service, we collect the following personal information:

- name, address, and other contact details which you provide us with on completing your Application and Account Details Form;
- bank account details or other payment or financial information which you provide us with on completing your Application and Account Details Form;
- a record of any correspondence you have with us, including certain telephone calls which we may be legally required to record (but we will inform you at the beginning of the telephone conversation if recording will be necessary);
- information which you provide to us as part of, or contained within, any supporting documentation provided to us in accordance with clause 2.4(a) of the Terms and Conditions or where reasonably requested by us in accordance with the Terms and Conditions;
- the results of searches where we verify your identity or carry out searches in accordance with clause 2.4(a) of the Terms and Conditions; and
- any personal information provided to us by the Company.

Each time you use our websites, including our web portal (which can be accessed from www.signalshares.com), we will automatically collect certain technical information, including the type of browser you use, the ‘Internet Protocol’ (IP) address used to connect your computer to the internet, and information about your visit, including the full ‘Uniform Resource Locations’ (URL), clickstream to, through and from our sites, traffic data and other communication data, the resources that you access, and the information derived from the cookies we place on your mobile device and/or computer.

3. Why do we collect your information?

We collect this information in order to provide the Service to you, and to deal with your enquiries and requests connected with the Service, and our use of your information is required for the purposes of entering into our contract with you and on an ongoing basis pursuant to our contract with you. In addition, we are required by law to obtain “know your client” information in order to verify the identity of our customers as detailed in clause 2.4(a) of the Terms and Conditions and this includes certain personal information.

4. How do we use your personal information?

We will use the information we hold about you for the following purposes:

- to provide you with the Service, and/or information you request from us;
- to check your identity;
- to assess any application you make to participate in any service we provide;
- so that we can communicate with you as necessary, including to answer questions raised by you;
- to carry out analysis about our services and how we might improve them;
- to notify you about changes to our services;
- to maintain records of your personal details, transactions and instructions;
- to comply with applicable laws in accordance with clause 2.4 of the Terms and Conditions;
- to process and pay monies to you in a particular currency;
- to transmit, process and record instructions received from you regarding payments on your shareholdings and your currency elections;
- any other processing activity which is strictly necessary for the processing of personal data in accordance with the purpose for collection and processing identified in paragraph 3 above, and in accordance with your instructions; and
- to write to you (or email you) with marketing information where you have consented to receive this.

5. Who do we share personal information with?

We will only disclose your personal information in accordance with applicable laws and regulations. We will disclose your information to the following third parties:

- the Company, Paying Agent (or its affiliated companies) and Euroclear UK & Ireland Limited (if entitled to such information), all of which may disclose the information to any person with legal or regulatory power over them such as regulatory, tax or governmental authorities as appropriate;

- any person with legal, administrative or regulatory power over us (such as the Financial Conduct Authority, police or the Serious Fraud Office) that may require disclosure on legal grounds;
- service providers engaged by us to help us run our business and provide the Service. Such service providers will include, for example, cloud storage providers (engaged by us to provide electronic storage facilities for our business data and your information), printer and mail firms (engaged by us to facilitate the printing and mail-out of communications and documents relating to the Service) and providers of data protection risk management platforms and reporting tools (engaged by us to record and monitor data protection governance, risk and compliance in accordance with best practice risk management procedures); and
- any member of the “**Link Group**” which means our subsidiaries, our ultimate holding company and its subsidiaries (from time to time) as necessary to provide the Service and to comply with our obligations under applicable laws.

Some of these third parties (including Link Group subsidiaries and service providers) may be outside of the European Economic Area (EEA). We will ensure that any such subsidiary or service provider has put in place adequate safeguards to ensure that your information is held securely and in accordance with these Terms and Conditions.

6. How do we keep your information secure?

We store the information you provide about yourself in a secure database and take appropriate security measures to protect such information from unauthorised access. For example, we have adopted internal data protection procedures and trained our staff on them with a view to preventing breaches of security. All exchanges of information between you and our web portal go through encrypted channels in order to prevent interception of your information.

7. How long will we store your information for?

We generally hold your personal data on our systems for as long as is necessary to perform our role under the Terms and Conditions. This is ordinarily up to 13 years from the date of termination of the Terms and Conditions and the Service we provide to you in accordance with clauses 6 and 11.1, in order to allow us to comply with our regulatory obligations.

8. What are your rights?

You have the following rights in relation to how we use your information. If you would like to exercise these rights please contact us using the contact details listed in the Terms and Conditions.

- Right of access – you have the right to know if we are using your information and, if so, about how we are using it.
- Right of rectification – you have the right to require us to rectify any errors in the information we hold about you.
- Right to erasure – you have the right to require us to delete your information if our continued use is not justified.
- Right to restrict processing - in some circumstances, although you may not be entitled to require us to erase your information, but may be entitled to limit the purposes for which we can use your information.
- Right of data portability – you have the right to require us to provide you with a copy of your information in a commonly used machine-readable format or to transfer your information directly to another controller (e.g. a third party offering services competing with ours).

9. Who can you speak to at Link about this notice?

Questions, comments and the exercise of your rights regarding this notice and your information are welcomed and should be addressed to the Data Protection Officer by email at ImSDPO@linkgroup.co.uk or by post to the Data Protection Officer, International Payment Service, Link Market Services Limited, Central Square, 29 Wellington Street, Leeds LS1 4DL, quoting your full name and address, the name of the Company and your Investor Code which may be found on your personal statement.

If you wish to make a complaint on how we have handled your personal information, you can contact our Data Protection Officer. If you are not satisfied with our response or believe we are processing your personal information not in accordance with the law you can complain to the supervisory authority in the UK responsible for the implementation and enforcement of data protection law: the Information Commissioner’s Office (the “**ICO**”). You have the right to complain to the ICO about our collection and use of your information. You can contact the ICO via their website – <https://ico.org.uk/concerns/> - or by calling their helpline – 0303 123 1113.