

PRIVILEGED AND CONFIDENTIAL

Privacy Policy

This Privacy Policy applies to our users of this website, our clients or representatives of a client to the extent that they are EU citizens or are based in the EU.

Mooreland Partners LLP ("we", "us", "our", "Mooreland") is committed to protecting and respecting the privacy of you ("you", "your") as a user of this website (www.moorelandpartners.com) ("Site") or if you are a client (or representative of a client of ours), then as a client or representative of a client to whom we provide investment banking services ("Services") pursuant to our engagement letter with you.

This privacy policy sets out the basis on which any personal data that we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our practices regarding the personal data that we collect about you, how and why we use it and your rights in relation to it. Depending on where you are resident, you may have some or all of the following rights under applicable law in respect of data about you that we hold.

For the purposes of data protection law in the European Union, Mooreland Partners LLP is the controller of your personal data.

Personal data we collect

Website users

We collect and process the following information about you for the following purposes:

Website User Details: Information you provide to us (e.g., your name, telephone number and email address)

Website User Technical Information: such as details of your visits to our website and the resources that you access. For example, we may compile reports and statistical analyses about how many users visited our website, what pages have been browsed, and from what geographic regions users visited the website. This may include information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information on website usage. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

Cookies: we use cookies to enable you to use our website and the materials on it. Cookies are also used to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our website. We may also use web beacons (e.g., internet tags, pixel tags or clear GIFs).

Website User Marketing: preferences includes any marketing preferences you may have informed us of.

Clients

In order to provide Services to our clients, we collect and process personal data, such as:

- **Client Contact Information:** name, the company you work for (if you are a representative of a client), your title or position, postal address, email address and telephone number.
- **Financial Information:** payment-related information details of any fees including outstanding amounts and payment terms.
- **Meeting Information:** information you may provide to us for the purposes of attending meetings and events, including dietary preferences and access requirements.
- **Onboarding Information:** identification and background information provided by you in relation to your directors or employees and collected as part of our client onboarding procedures.
- **Client Transaction Information:** information provided to us by or on behalf of our clients or generated by us in the course of providing services to them.
- **Client Marketing Preferences:** marketing preferences. Any other information relating to you which you may provide to us.

Use of your information

We use personal data about you for various purposes connected with and/ or our Services as described below. In order to use your information, we must have a legal basis for doing so. The legal bases that we rely upon are explained further in the “find out more” section below. We will only use your information where it is necessary:

- to fulfil our contract for Services with you (or the client whom you represent)
- to comply with a legal obligation to which we are subject
- for our legitimate business interests that are not overridden by your interests, rights and freedoms.

Where none of the above applies, we will request your consent (which we will ask for before we process your information).

Site users

The table below sets out further information about the purposes for which we use data about you, with the corresponding methods of collection and legal basis that we rely upon for its use.

Purpose	Legal basis for processing
<p>To manage and facilitate your use of our Site</p> <ul style="list-style-type: none"> • to provide you with suitable content • to provide you access to certain materials and features, such as our publications • to comply with our legal obligations, policies and procedures in relation to use of our Site 	<p>We process your Website User Details, Website Technical Information and cookies. as it is in our legitimate business interest to provide information on these services and to provide content and manage our site to you as a Client or prospective Client of our Firm or to ensure that our terms of use, policies and procedures relating to the site are being complied with.</p>

Purpose	Legal basis for processing
<p>To communicate with you</p> <ul style="list-style-type: none"> to respond to any enquiries or feedback that you send to us to assist you with any technical problems you have with our Site to update you with any changes to our terms and conditions/ other policies 	<p>We process your Website User Details to respond to any communications that you send to us.</p> <p>It is in our legitimate business interest to respond to communications that you send to us, to inform you of relevant information in relation to the Services that we provide and to utilise your information to improve our business.</p>
<p>To send you information about our Services</p> <ul style="list-style-type: none"> to send you information which you have requested e.g. newsletters or publications in accordance with your specified preferences 	<p>Where you have requested information from us, such as newsletters, publications or event invitations, we process your Website User Details and your Website User Marketing Preferences for this purpose.</p> <p>You can ask us to stop sending such communications at any time by clicking on the unsubscribe link at the bottom of the message Please allow up to 1-2 weeks for any opt out request to be processed.</p>
<p>To improve and develop our Site</p> <ul style="list-style-type: none"> we conduct statistical analyses on your usage of the Site e.g., to enable us to improve our Site, offer new features and materials, etc. 	<p>We process your Website User Technical Information and Cookies for this purpose.</p> <p>It is in our legitimate business interest to identify ways to improve our Services (and develop new ones) and Website for our customers.</p>

Clients

Purpose	Legal basis for processing
<p>To provide you or our client with our Services</p> <ul style="list-style-type: none"> to provide you or the client whom you represent with our Services to manage or administer our relationship with you and our client as part of our client onboarding procedures to respond to any enquiries or feedback that you send to us to update you with any changes to our terms of business or other policies 	<p>We use your Client Contact Information, Financial Information, Onboarding Information, Client Transaction Information and Meeting Information to fulfil our contract for services. In cases where you are a representative of our client, it is our legitimate business interest to process your data to provide our services.</p>
<p>For our business management and administrative purposes</p> <ul style="list-style-type: none"> to administer and manage our Services and business in an efficient and proper way e.g., accounting, billing, client management, etc. to manage how we work with other companies that provide services to us 	<p>We process your Client Contact Information, Financial Information, Onboarding Information, Meeting information and Client Transaction Information.</p> <p>It is our legitimate business interest to manage and administer our Services, comply with laws to which we are subject to and protect our business interests and legal rights.</p>

Purpose	Legal basis for processing
<ul style="list-style-type: none"> to comply with legal and regulatory obligations to which we are subject e.g., anti-money laundering regulations, conflict checks, reputation and financial checks, etc. to establish and protect our business and legal rights or defend ourselves against any legal actions 	
<p>To share information with third parties</p> <ul style="list-style-type: none"> please see the section on sharing of your information 	<p>We use your Client Contact Information, Financial Information, Client Transaction Information, Meeting Information and Onboarding Information and it is in our legitimate business interests to share this information with service providers which act on our behalf and enable us to provide our services.</p>
<p>To send you information about our services</p> <ul style="list-style-type: none"> to send you information which we think may be of interest to e.g. newsletters, publications or events invitations. 	<p>Where you have requested information from us, such as newsletters, publications or event invitations, we send such communications based on your consent. We process your Client Marketing Preferences Data for this purpose.</p> <p>In other circumstances, we rely on our legitimate interests to send you relevant communications which we think will be of interest to you.</p> <p>You can ask us to stop sending such communications at any time by clicking on the unsubscribe link at the bottom of the message or by contacting us at. Please allow up to 1-2 weeks for any opt out request to be processed.</p>

Sharing of your information

Clients

We may disclose your personal data to third parties as described below:

- as part of the Services we provide to you (or the client you represent), we may disclose personal data to other advisors of or services providers to you as necessary, or to potential transaction counterparties as instructed by you and where it is required for us to provide necessary services to you;

- where we are under a legal, regulatory or professional obligation to disclose your personal data to the Financial Conduct Authority or other regulatory authorities, courts, tribunals, government agencies or law enforcement agencies or in order to enforce the terms that we have in place or our legal rights;
- to our professional advisors and auditors in order to manage and administer our business;
- to third party service providers who provide us with services e.g., IT providers, and AML providers);
- if our assets, or substantially all of our assets are merged or acquired by a third party, in which case your personal data may form part of the transferred or merged assets.

If you would like to receive a full list of our suppliers and other third parties who we share your data with then you can get in touch with us using the details provided in the Contact Us section.

In some instances, we may intend to use your information in ways that are not described above. However, we will inform you before doing so and if necessary seek your consent to do so.

Transfers of your Personal Data

We are part of an international group of entities and, as such, your personal data may be transferred to and stored at a destination outside the European Union ("EU") depending on the nature of the Services we provide to you. The entities within our group are:

- Mooreland Partners LLP
- Mooreland International LLP
- Mooreland Holdings LLC
- Your personal data may also be processed outside the EU by one of our service providers.

Where we process your personal data outside of the EU, we will ensure that your personal data is protected by implementing appropriate safeguards, such as a European Commission adequacy decision, the EU-US Privacy Shield Certification or the EU Commission approved Standard Contractual Clauses. If you would like more information about any of the data transfer safeguards we implement you can get in touch with us using the details provided in the section Contact Us section.

How we protect your information

We implement appropriate technical and organisational measures to protect personal data that we hold from unauthorised disclosure, use, alteration or destruction. Where appropriate, we use encryption and other technologies that assist in securing the data you provide. We also require our service providers to comply with strict data privacy requirements.

How long we keep your information for

The period for which we may retain your information will depend on the purposes for which the data was collected, whether you have requested deletion of the data, applicable limitation periods for legal action, whether any legal or regulatory obligations require the retention of the data and good practice or our business interests. We will not retain data about you for longer than is necessary to fulfil the purposes for which the data was collected than is required for legal or regulatory purposes. In general, for the personal data generated pursuant to a contract we have with you to provide services, we hold such data for a period of 6-7 years from contract expiry/ termination date.

Your Rights

You may have some or all of the following rights in respect of the information about you that we process:

- request us to give you access to it

- request us to rectify it or update it
- request us to restrict our using it, in certain circumstances
- request us to erase it, in certain circumstances
- object to our using it, in certain circumstances
- withdraw your consent to our using it
- data portability, in certain circumstances
- opt out from our using it for direct marketing; and
- lodge a complaint with the relevant supervisory authority.

These rights are explained in more detail in the table below:

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
<ul style="list-style-type: none"> • to request us to give you access to it 	<p>This is confirmation of:</p> <ul style="list-style-type: none"> • whether or not we process data about you; • our name and contact details; • the purpose of the processing; • the categories of data concerned; • the categories of persons with whom we share the data and, where any person is outside the EU, the appropriate safeguards for protecting the data; • (if we have it) the source of the data, if we did not collect it from you; and • the criteria for determining the period for which we will store the data. <p>On your request we will provide you with a copy of the data we hold.</p>
<ul style="list-style-type: none"> • to request us to rectify or update it 	<p>This applies if the data we hold is inaccurate or incomplete.</p>
<ul style="list-style-type: none"> • to request us to erase it 	<p>This applies if:</p> <ul style="list-style-type: none"> • the data we hold is no longer necessary in relation to the purposes for which we use it; • we use the data on the basis of your consent and you withdraw your consent (in this case, we will remember not to contact you again, unless you tell us you want us to delete all data about you in which case we will respect your wishes); • we use the data on the basis of legitimate interest and we find that, following your objection, we do not have an overriding interest in continuing to use it; • the data was unlawfully obtained or used; or • to comply with a legal obligation.

Right in respect of the data about you that we hold	Further detail (note: certain legal limits to all these rights apply)
<ul style="list-style-type: none"> to request us to restrict our processing of it 	<p>This right applies, temporarily while we look into your case, if you:</p> <ul style="list-style-type: none"> contest the accuracy of the data we use; or have objected to our using the data on the basis of legitimate interest <p>(if you make use of your right in these cases, we will tell you before we use the data again).</p> <p>This right applies also if:</p> <ul style="list-style-type: none"> our use is unlawful and you oppose the erasure of the data; or we no longer need the data, but you require it to establish a legal case.
<ul style="list-style-type: none"> to object to our processing it 	<p>You have two rights here:</p> <ol style="list-style-type: none"> if we use data about you for direct marketing: you can “opt out” (without the need to justify it) and we will comply with your request; and if we use the data about you on the basis of legitimate interest for purposes other than direct marketing, you can object to our using it for those purposes, giving an explanation of your particular situation, and we will consider your objection.
<ul style="list-style-type: none"> to withdraw your consent to our using it 	<p>This right applies to any data which we have collected and process based on your consent.</p> <p>You have the right at any time to withdraw the consent you have provided to us.</p>
<ul style="list-style-type: none"> to data portability 	<p>This right applies:</p> <ol style="list-style-type: none"> to data that you have provided to us; and if we use that data on the basis either of your consent, or on the basis of discharging our contractual obligations to you. <p>If both (i) and (ii) apply, you have the right to receive the data from us in a commonly used format, and the right to require us to transmit the data to someone else if it is technically feasible.</p>
<ul style="list-style-type: none"> to lodge a complaint with the Information Commissioner’s Office or other supervisory authority in your country or take your complaint to a national court 	<p>Each EU country has a supervisory authority responsible for upholding data protection rights. In the UK, this is the Information Commissioner’s Office www.ico.org.uk</p> <p>You also have the right to obtain a remedy from a national court.</p>

You are able to exercise these rights by contacting us using the details provided in the Contact Us section.

Cookies

We use the following category of cookies on our Website:

- Performance Cookies:** these cookies collect anonymous information on how you use our Website. For example, we use Google Analytics cookies to help us understand how visitors to our Website navigate the Website and to highlight areas where we can make improvements. The data stored by these cookies does not show personal details from which your individual identity can be established. You may opt out of these cookies using your browser settings but it may affect the performance of our Website.

We rely on your consent to process cookies.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies. Information on deleting or controlling cookies is available at www.aboutcookies.org. by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Website.

To opt out of Google Analytics cookies across all websites, please visit: Google Analytics Opt-out Browser Add-on and for other third party cookies relating to behavioural advertising, please go to www.youronlinechoices.eu. Opting out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted out will no longer deliver adverts tailored to your web preferences and usage patterns, so you may see a greater number of adverts that are irrelevant to you and your preferences.

In addition to the cookies that we use on our Website, we also use cookies and unique identifiers to analyse the effectiveness of our marketing activities, and we track to see whether marketing emails are opened.

Contact Us

If you have any questions, would like to exercise any of your rights in relation to your information or need further information about our privacy practices, please contact privacy@moorelandpartners.com.

Changes to this policy

We may update this policy from time to time as shown below. We will notify you of the changes where required by applicable law to do so.

Last modified May 2018.