

Aspect Capital Limited Privacy Notice

In this notice, “we”, “us” and “our” means Aspect Capital Limited, being the entity employing or engaging, or proposing to employ or engage you on the date that you receive this document.

We are registered in the UK and our registered address is at 10 Portman Square, London, W1H 6AZ and our company registration number is 3491169.

About this privacy notice

For the purposes of data protection law, we are a data controller in respect of your personal data. We are responsible for ensuring that we use your personal data in compliance with data protection law.

This privacy notice applies if you are a prior, current or prospective employee or contractor of our organisation. The privacy notice sets out the basis on which any personal data about you will be processed by us. Please take the time to read and understand this privacy notice.

Personal data that we collect about you

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

- **Information that you provide to us or one of our affiliates.** This includes information about you that you give to us by filling in forms or by communicating with us, whether face-to-face, by phone, e-mail or otherwise through the recruitment process and during your employment or engagement with us. This information may include:
 - your full name, date of birth, nationality, education and qualification details, marital status, home address and home telephone number, mobile telephone number, next of kin, emergency contact details, bank account details for the transfer of your salary and other benefits, tax details and your date of hire.
- **Information we collect or generate about you.** This includes:
 - work-related details such as your job position, contact details, performance at work, absences, pay and benefits information, service history, a copy of your employment/services agreement, passport details, photograph, health information, pregnancy and/or disability status;
 - personal data that we collect through your use of our email system (including but not limited to your full name, email address and the content, date and time of your email correspondence), call recording of certain personnel for regulatory reasons, CCTV recording for security purposes and monitoring of IT usage for security purposes; and
 - information obtained through an exit interview with you (upon your departure from our organisation), including your reasons for leaving.
- **Information we obtain from other sources.** This includes:
 - personal data obtained from external recruitment agencies, external references provided by former employers, outsourced background checks in connection with initial personnel onboarding or ongoing regulatory obligations and details of personal holdings in certain financial instruments which are provided by brokers and other third parties.

Uses of your personal data

Your personal data may be stored and processed by us in the following ways and for the following purposes:

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- to meet our legal obligations as an employer/contracting entity and perform our obligations and exercise our rights under your employment or services contract with us. For example, we use your personal data to pay you, to evaluate your individual performance, and provide benefits in connection with your engagement;
 - we will use the private contact details relating to you and your next of kin (and that you have provided to us for emergency purposes) only in connection with an emergency; and
 - we will process personal data related to your use of our email system in order to enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures.

We are entitled to use your personal data in these ways because:

- we need to do so in order to perform our obligations and exercise our rights in connection with your employment or services contract with us;
- we may need to do so for the purposes of occupational health and to take decisions regarding your fitness for work;
- we have legal and regulatory obligations that we have to discharge;
- we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; or
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the management of our personnel and the personnel of our affiliates;
 - maintaining compliance with internal policies and procedures; or
 - being able to contact you or your family in the event of an emergency.

Disclosure of your information to third parties

We may disclose your personal data to our affiliates for the purposes of:

- the management and administration of our business and our affiliates' business;
- complying with the functions that each of them may perform relating to Organisational Development decisions;
- benchmarking personnel salaries and benefits with similar organisations;
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses;
- where your personal data are held as part of an internal directory, enabling adequate communication with you for the performance of ordinary course duties or for emergency reasons; and

- the administration and maintenance of the databases storing personal data relating to our or our affiliates' personnel.

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

We may also share your personal data with third parties outside of our corporate group for the following purposes:

- to third party agents and contractors for the purposes of providing services to us, including outsourced payroll services, outsourced background checks in connection with personnel onboarding and ongoing regulatory obligations, provision of personnel benefits such as pensions, personnel travel providers, IT and communications providers, law firms, accountants and auditors. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice; and
- to clients, consultants and their agents and contractors when conducting due diligence on us, including personnel background checks;
- if we sell any of our business or assets, in which case we may disclose your personal data to the prospective buyer for due diligence purposes; or if we are acquired (in whole or in part) by a third party, in which case personal data held by us about you will be disclosed to the third party buyer; or
- 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 or regulatory obligation (for example in order to comply anti-money laundering or "know your client" checks carried out by a third party or in connection with enquiries from regulatory or tax authorities) or to establish, exercise or defend our legal rights.

Transfers of personal data outside the European Economic Area

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It may also be processed by individuals operating outside of the EEA who work for our affiliates 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 country that we send the data to might be approved by the European Commission as offering a sufficient level of protection;
- 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 about 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) by contacting us in accordance with the "Contacting us" section below.

Retention of personal data

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

- the purpose for which we are using your personal data – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Your rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we will still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so.
- in some circumstances, the right to 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. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to 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;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where we are nonetheless legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) 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 “Contacting us” section below.

Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to Amanda Cherry, Director of Organisational Development.

You can find out more information about your rights by contacting the data protection regulator in the UK, the Information Commissioner’s Office, or by searching their website at www.ico.org.uk.