

IDCM PRIVACY POLICY

1 Purpose of this Privacy Policy

- 1.1 This privacy policy aims to give you information on how the IDCM group (**IDCM, we or us**) collects and processes personal data.
- 1.2 It is important that you read this privacy policy carefully so that you are fully aware of how and why we are using your data.
- 1.3 This website is not intended for children and we do not knowingly collect data relating to children.

2 About Us

- 2.1 We are IDCM Limited, a company registered in England and Wales (Company No. 09101952), InterAlia Capital Limited (Company No. 09090298) Novatio Capital Limited (Company No. 08717871), IDCM M&A Limited (Company No. 13630997) each having a registered office at 12a Upper Berkeley Street, London, England, W1H 7QE, and IDCM Netherlands B.V. which is registered with the Kamer van Koophandel in Amsterdam with number 86586513.
- 2.2 We are the "controller" of the personal data we hold about you. This means that we are legally responsible for how we hold and use information about you. It also means that we are required to comply with data protection laws when holding and using your personal information. This includes providing you with the details contained within this notice of how we hold and use your personal information, who we may share it with and your rights in relation to your personal information.
- 2.3 The companies incorporated in the UK are registered with the Information Commissioner's Office (**ICO**) under registration numbers ZA578760, ZA579337, ZA579305 and ZB722681.

3 Contact Details

- 3.1 We have appointed a data protection contact who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the data protection contact using the details set out below:
 - (a) **Full name:** Alan Pennell
 - (b) **Email address:** alan.pennell@idcm.eu.com
 - (c) **Postal address:** 12a Upper Berkeley Street, London, England, W1H 7QE
 - (d) **Telephone number:** +44 20 3955 6934
- 3.2 You have the right to make a complaint at any time to the ICO, the UK regulator for data protection issues (www.ico.org.uk) or the Dutch Data Protection Authority (Dutch DPA) (<https://www.autoriteitpersoonsgegevens.nl/en/datalek-melden>) as appropriate. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or Dutch DPA so please contact us in the first instance.

4 Who Does this Policy Apply to?

4.1 This policy applies to information we collect about:

- (a) visitors to our website (<https://idcm.eu/>);
- (b) IDCM clients;
- (c) IDCM employees; and
- (d) individuals who apply for jobs with us.

5 You Legal Rights

5.1 Under certain circumstances, you have rights under data protection laws in relation to your personal data. This includes the right to:

- (a) be informed of the personal data we hold on you;
- (b) access and obtain a copy of all your personal data on request;
- (c) require us to change incorrect or incomplete personal data;
- (d) require us to delete or stop processing your personal data (e.g. where the data is no longer necessary for the purposes) and object to the processing of your data where IDCM does not require to process it;
- (e) personal data portability;
- (f) object to the personal data we hold on you; and
- (g) be informed of automated decisions made in relation to you.

5.2 If you would like to exercise any of the above rights, please contact the data protection contact (see above).

6 The Data We Collect About You

6.1 Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

6.2 We may collect, use, store and transfer different kinds of personal data about you which we have detailed in the table below:

Type of Personal Data	Type of Data Collected	How is this information collected?
Identity Data	<ul style="list-style-type: none">i. Nameii. e-mail addressiii. Phone number(s)iv. Postal address	You may give us this personal data by filling in forms or by corresponding with us by post, phone, email or otherwise.

	<ul style="list-style-type: none"> v. Job title vi. Date of birth vii. Gender viii. Nationality 	
Technical Data	<ul style="list-style-type: none"> i. Internet protocol (IP) address ii. Geographical location iii. Time zone setting iv. Computer system v. Operating system / platform vi. Browser type vii. Browser version viii. Browser plug-in types and versions ix. Pages visited x. Time spent on those pages 	As you interact with our website, we will automatically collect Technical Data by using cookies and other similar technologies.
Marketing and Communications Data	<ul style="list-style-type: none"> i. Your preferences in receiving marketing from us ii. Your communication preferences 	<p>We may obtain your personal data if it is publicly available (for example, on your company's website).</p> <p>We may also obtain your personal data in the course of a transaction with us where we decide that you may want to receive information about similar products and services.</p>
Transaction Data	<ul style="list-style-type: none"> i. Bank account details ii. Details about payments to and from you 	You provide us this personal data by transacting with us.

6.3 We also collect and use personal data about our employees and people who apply for jobs with us. For more information regarding this, including the types of data collected, please refer to paragraph 8 below.

6.4 We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly

identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

7 How We Use Your Personal Data

7.1 We will only use your personal data when the law allows us to. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

7.2 Please note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below:

Purpose/Activity	Type of Data	Lawful Basis
To manage our relationship with you including: i. notifying you about material changes to our privacy policy; ii. to contact you in relation to a query you have submitted.	i. Identity	i. Performance of a contract with you; ii. Necessary to comply with a legal obligation.
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).	i. Identity; ii. Technical.	i. Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise); ii. Necessary to comply with a legal obligation.
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you.	i. Identity; ii. Technical; iii. Marketing and Communications.	i. Necessary for our legitimate interests (to study how customers use our products/services, to develop them, and to grow our business).
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.	i. Technical	i. Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy).

Purpose/Activity	Type of Data	Lawful Basis
To register you as a new customer and manage our relationship with you including 'Know Your Client' checks and necessary due diligence reviews.	i. Identity; ii. Transaction.	i. Performance of a contract with you; ii. Necessary for our legitimate interests (to recover debts due to us).

8 Employees and Recruitment Personal Data

- 8.1 We collect personal data from job applicants and employees as necessary to evaluate and respond to any job applications and to perform our obligations as an employer. This may include identity data, contact information, financial information (such as bank account information for payroll purposes), and information about qualifications and experience pertinent to the role.
- 8.2 We may also collect special category personal data, including information relating to health and information about criminal convictions and offences. We may need to collect information about health to meet our obligations to provide a safe working environment or workplace adjustments, and to meet our equal opportunities obligations. Criminal conviction data may be collected as part of any checks (including regulatory checks) conducted during our recruitment process, or if this is otherwise provided to us by an applicant or an employee.
- 8.3 The lawful basis for processing this personal data is:
- (a) necessary to take steps to enter into an employment contract, or the performance of an employment contract we have entered into with you;
 - (b) where we need to comply with a legal or regulatory obligation as an employer (including statutory obligations); and / or
 - (c) where it is necessary for legitimate interests pursued by us and your interests and fundamental rights do not override those interests.
- 8.4 For further information or queries on how we process employee personal data, or personal data collected as part of our recruitment process, please contact our data protection contact (see details above).

9 Sharing Your Personal Data

We will not sell, distribute or lease your personal information to third parties unless we have your permission or we are required by law or regulation to do so.

10 International Transfers

We may share your personal data internationally. This will involve transferring your data outside the United Kingdom or The Netherlands in accordance with data protection legislation.

11 If You Fail to Provide Personal Data

- 11.1 Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

12 Marketing

- 12.1 We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.
- 12.2 We will send you marketing correspondence where it is in our legitimate business interests to do so. We will only send marketing correspondence to you in your professional capacity. You can opt-out of receiving the marketing correspondence by contacting us at any time.

13 Cookies

- 13.1 A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.
- 13.2 We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from the system.
- 13.3 Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.
- 13.4 You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

14 Third-Party Links

- 14.1 This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

15 Data Security

- 15.1 We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

- 15.2 We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

16 Data Retention

- 16.1 We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.
- 16.2 To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

17 Changes to the Privacy Policy and Your Duty to Inform us of changes

- 17.1 We keep our privacy policy under regular review.
- 17.2 It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.
- 17.3 We reserve the right to change this notice at any time.