

## Privacy Notice – Numis Europe Limited

This privacy notice only applies to the collection and use of personal data by Numis in the context of the Numis Corporate App (“App”). It does not apply to any other use of personal data by Numis. This Privacy Notice should be read in conjunction with our Cookies Policy at <https://www.numis.com/legal-and-regulatory/cookie-policy>.

References in this App Privacy Notice to “Numis” means Numis Europe Limited (a company registered in Ireland with registration number 694628 and registered office at Riverview House, 21-23 City Quay, Dublin, Ireland).

Numis is the “data controller” of your personal data (i.e. it is the company responsible for and which controls the processing of your personal data for the purposes of the App). This privacy notice describes how Numis processes your personal data in accordance with the General Data Protection Regulation 2016/679, the EU Privacy and Electronic Communications Directive 2002/58/EC (the ePrivacy Directive), and any national implementing laws, as amended or updated from time to time.

“Personal data” means any information about an individual from which that person can be identified. There are instances where we invite or request individuals to provide us with their personal data through our App.

The App is simply a different way of accessing the same content Numis provides to you as a client under your existing engagement.

### 1. Information we may collect from you

The App will only collect:

- your email address and the UDID number of your device for the purposes of authorising your device to access information from Numis via the App. This is to ensure the security of Numis’ systems, servers and the information provided via the App; and
- information about your interactions with the App and its content to allow Numis to personalise and tailor the App content and how it is presented to suit your needs and to enhance your experience.

Numis holds your contact details because of its existing engagement with you for the provision of services. For the purposes of the App, Numis uses these contact details (such as your name, job title and email address) to invite you to install and use the App and to authorise the initial installation of the App on your device. Numis does not make any other use of your contact details for the App.

If you do not allow Numis to process any personal data for the purposes of the App, Numis will be unable to provide you with access to the App for security reasons. We will tell you when we ask for personal data whether it is a contractual requirement or needed to comply with our legal obligations.

Numis is committed to taking appropriate technical and organisational measures to protect your personal data against unauthorised or unlawful processing and against accidental loss, destruction or damage.

The App is hosted on the cloud on behalf of Numis by Microsoft Azure, who provides cloud services to us – we may disclose your personal data to Microsoft Azure. Numis requires Microsoft Azure to have appropriate technical and organisational measures in place to protect your personal data.

### 2. How we use personal data we collect

Numis only processes personal data for the App where it is necessary for your access and use of the App (to perform the contract that Numis has entered into with you) or where Numis needs to comply with a legal or regulatory obligation.

### 3. Disclosure of your information

We may disclose your personal data to:

- A third party who provides a service to us.
- A prospective seller or buyer of any our business or assets.
- A third party where we are under a duty to disclose or share your personal data in order to comply with any legal obligation.
- A third party where it is necessary to protect the vital interests of the data subject or another natural person.
- A third party where necessary for our legitimate business interests to protect the rights, property,

or safety of NEL, our customers, or others.

#### 4. Cross-border Data Transfers

Numis may transfer your personal data outside of the European Economic Area (“**EEA**”). If we do transfer personal data which we collect from you to a destination outside the EEA, we will ensure appropriate safeguards are in place to protect the transfer of your personal data to these non-EEA countries, including adequacy decisions under Article 45 GDPR (including in respect of the UK).. To obtain more information concerning these safeguards, you can contact us using the contact details set out below.

#### 5. Data Retention and security

Numis will retain your personal data collected via the App for as long as needed to provide you with access to and use of the App as described in this App Privacy Notice and as required by law or regulatory guidance to which we are subject, and for the exercise or defence of legal claims that may be brought by or against us.

Numis is committed to protecting the security of your personal data. We use a variety of security technologies and procedures to help protect your personal data from unauthorised access and use. As effective as modern security practices are, no physical or electronic security system is entirely secure. We cannot guarantee the complete security of our database, nor can we guarantee that information you supply will not be intercepted while being transmitted to us over the Internet. We have implemented strict internal guidelines to ensure that your privacy is safeguarded at every level of our organisation. We will continue to revise policies and implement additional security features as new technologies become available. Where we have given you a password which enables you to access certain parts of our App, you are responsible for keeping that password confidential. We ask you not to share your password with anyone.

Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our App. Any transmission of personal data is at your own risk. Once we receive your personal data, we use appropriate security measures to seek to prevent unauthorised access or disclosure.

#### 6. Your rights

Individuals have certain rights regarding the use of their personal data. The following is a summary of your rights:

- **access** a copy of your personal data;
- have inaccurate personal data **corrected**;
- **object** to Numis processing your personal data if Numis is not entitled to use it anymore;
- have your personal data **deleted**, or have its processing **restricted** in certain circumstances;
- request us to transmit your personal data to you, or a nominated third party where technically feasible; and
- **withdraw consent** to direct marketing, or to **withdraw consent** where we process personal data based on your consent, without affecting the lawfulness of processing based on consent before its withdrawal.

When we process personal data you provide to us based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

If you would like to exercise any of these rights, you will find Numis’ contact details set out below. We will respond to your request within one month. That period may be extended by two further months where necessary, taking into account the complexity and number of requests. We may request proof of identification to verify your request. We have the right to refuse your request where there is a basis to do so in law, or if it is manifestly unfounded or excessive, or to the extent necessary for important objectives of public interest

You also have the right to lodge a complaint with the Irish data protection supervisory authority, the Data Protection Commission, if you have concerns about how Numis uses your personal data.

#### 7. Changes to this Privacy Notice

Numis reserves the right to update this App Privacy Notice at any time at our sole discretion. Numis will provide you with a new App Privacy Notice when it makes any substantial updates.

## **8. Contact Us**

**Numis' Data Protection Manager is Ian Wright who can be contacted at [dataprotection@numis.com](mailto:dataprotection@numis.com) if you have questions in relation to your personal data.**

Last Updated: 1 July 2022