



## Privacy at BlackRock

BlackRock Inc. and its subsidiaries (collectively “BlackRock”) are committed to safeguarding Personal Information (“PI”) and processing PI in line with applicable privacy and data protection laws.

Our privacy notices set out the PI collected by BlackRock, the purposes for which PI is collected and processed, who it may be disclosed to as well as Individuals’ Rights. For further information please click on the notice that is relevant to your relationship with BlackRock. In addition, our Cookie Notice applies to any person visiting any of BlackRock websites.

## BlackRock Client and Vendor Privacy Notice

Last revised: 6 April 2021

### Introduction

BlackRock is committed to processing personal information (“PI”), including sensitive personal information (“SPI”)<sup>1</sup>, in line with all applicable privacy and data protection laws. Most of our offices are located in countries with laws governing the processing of PI. “BlackRock”, “we”, “us” or “our” means BlackRock, Inc., and each of the direct or indirect subsidiaries of BlackRock, Inc. (the “**BlackRock Group**”). BlackRock, Inc., BlackRock Group functions and the entity you contract with are the controllers of your PI. If your contract with the BlackRock Group is in connection with an investment in a BlackRock managed vehicle, the management company of the fund, together with the fund entity and, in circumstances where the investment manager is part of the BlackRock Group, that investment manager, will be the controller. References to “you” or “your” refers to individuals whose PI is processed by BlackRock, including clients with direct or indirect relationships (such as those who invest through an intermediary); employees, contingent workers, officers, agents (together “**Representatives**”); and beneficial owners of an organization or entity in connection with:

- the provision of services to potential and actual clients;
- transactions to which we are party (including those which we effect on behalf of clients); or
- services provided to us by a third-party vendor.

This Privacy Notice sets out the purposes for which we collect, use and disclose (collectively “processing”) PI and how it is protected. It also sets out individuals’ rights in relation to the processing of their PI. There may be additional terms, conditions and commitments that also govern how we collect, use and disclose your PI, which should be read in conjunction with this Privacy Notice.

### PI we collect about you

PI is information relating to an individual, which can be used either alone or with other sources of information to identify that individual. PI does not include information where the identity of the individual or the specific detail of the information has been removed and is therefore anonymous. SPI is a sub-category of PI that includes PI relating to race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data.



The nature of the information that we collect will depend on the services we provide and our relationship with you. We categorize PI we process as follows (the PI listed for each category are non-exhaustive examples):

- **Identification data**  
Full name, title, gender, marital status, date of birth, passport number, driving licence number, national identification number, signature
- **Contact data**  
Personal address, telephone number, email address
- **Electronic Monitoring data**  
To the extent permitted by law, we may record and monitor your electronic communications with us
- **Financial data**  
Bank account number; credit card number
- **Marketing and Communications data**  
Marketing and communication preferences; tracking data relating to whether you have read marketing communications from us
- **Professional Information data**  
Position/job title, work address; telephone number; email address
- **Profile data**  
Username and password for our online services that you have access to; investments made by you; services requested; marketing communications responded to; survey responses
- **Services data**  
Payment details to and from you; details of services you have provided to us, or we have provided to you
- **BlackRock Building and Assets Security data**  
Records of visits to our premises; CCTV recordings
- **Technical data**  
Your use of and interaction with our online services; your IP address; browser type and version; browser plug in types and versions; operating system
- **SPI**  
In limited circumstances, and where allowed by law, we may collect information about criminal convictions and offences, when legally required; dietary requirements if we are arranging catering; disability so that we can make reasonable accommodations for you in our buildings; sexual orientation if you provide details of your spouse or partner; political affiliations for us to determine whether you are a politically exposed person.

We collect PI in relation to you in a number of ways, including:



- when you provide it to us in connection with a BlackRock product or service, such as a completed investment application form
- if you are Representative of an organization or entity that is a client or vendor of BlackRock and that organization or entity provides us with your PI
- throughout the course of our relationship with you, including where you change your details, provide additional PI, or where the services we are providing to you change
- from public sources where you have manifestly chosen to make your PI public, including via public profiles on social media
- from third parties such as credit reference agencies
- from visits to our websites or through logging into any of our online services

We may also create or derive PI such as creating records of your interactions with us, subject to applicable law.

Unless we otherwise indicate that the provision of specific PI is optional, any PI we request is necessary for us to provide you or your organization or entity with the products and services requested. If you do not provide the PI requested, we may not be able to provide those products and services.

**In relation to vendor services:**

To whom we disclose your PI

In connection with one or more of the purposes outlined in the section ‘Purpose and Legal basis for processing your PI’ above, we may disclose PI in any jurisdiction to:

- other members of the BlackRock Group;
- professional advisors, third parties, agents or independent contractors that provide services to any member of the BlackRock Group (such as IT systems providers, platform providers, financial advisors, brokers, consultants (including lawyers and accountants));
- goods and services providers (such as providers of marketing services where we are permitted to disclose your personal information to them); intermediaries, brokers, and other individuals and entities that partner with us;
- competent authorities (including any national and/or international regulatory or enforcement body, agency, court or other form of tribunal or tax authority) or their agents where BlackRock is required or allowed to do so under applicable law or regulation;
- a potential buyer, transferee, merger partner or seller and their advisers in connection with an actual or potential transfer or merger of part or all of BlackRock’s business or assets, or any associated rights or interests, or to acquire a business or enter into a merger with it;
- credit reference agencies or other organizations that help us to conduct anti-money laundering and anti-terrorist financing checks and to detect fraud and other potential criminal activity; or
- any person to whom disclosure is allowed or required by local or foreign law, regulation or any other applicable instrument.



#### International transfers and transfers to service providers

To provide global services and in the course of running our business, we may transfer PI to a location outside of the country where you reside or where services are provided to you or the organization or entity you work for, including BlackRock processing centers in the USA, Hungary, India and Singapore. Although the country to which PI may be transferred may not have the same level of privacy and data protection laws, we apply the same level of security and organizational controls to the processing of PI wherever it is processed. We require by contract that our third party service providers processing PI on our behalf to comply with BlackRock's criteria for PI processing.

If we transfer PI out of the EEA, we ensure a similar level of protection for your PI by ensuring the country to which the PI is transferred is considered by the EU Commission to provide an adequate level of protection, putting in place contractual clauses the EU Commission consider to provide the same level of protection.

#### Marketing and exercising your right to opt-out of marketing

We will not process your PI for marketing purposes if you have informed us you do not wish to receive marketing materials. You can request that we stop processing your PI for marketing purposes at any time by clicking on marketing opt-out links in any electronic marketing materials we send you, by making a request to your usual BlackRock contact or by using the contact details set out in the "Contacting Us" section of this Privacy Notice.

#### Third-party marketing/sale of PI

We do not share or sell your PI to third parties for the third party to use for their own marketing or other purposes.

#### PI retention

We will process your PI for as long as is necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory, accounting, reporting, internal policy requirements or for the establishment or defense of legal claims.

#### PI security

We use a range of physical, electronic and managerial measures to ensure a level of security appropriate to the risk of PI processing. These measures include:

- education and training of relevant staff to ensure they are aware of our privacy obligations when processing PI as well as training around social engineering, phishing, spear phishing, and password risks;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to PI in a timely manner in the event of a physical or technical incident;
- administrative and technical controls to restrict access to PI;
- technological security measures, including fire walls, encryption (industry standard SSL encryption with 128-bit key lengths), and anti-virus software;
- physical security measures, such building access controls;

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- external technical assessments, security audits and vendor due diligence;
- perimeter security;
- segregation of networks;
- application security;
- endpoint security;
- real-time monitoring of data leakage controls;
- layered and comprehensive cybersecurity defences; and
- security incident reporting and management.

The security of data transmitted over the internet (including by e-mail) cannot be guaranteed and carries the risk of access and interception. You should not send us any PI by open/unsecure channels over the internet. We endeavour to protect personal information but cannot guarantee the security of data transmitted to us or by us.

## Your rights

In certain circumstances you may have the following rights in relation to the processing of your PI:

- **Access**  
To request a copy of the PI we process in relation to you and to be informed about how we use and share your PI.
- **Object**  
To object to the processing of your PI if (i) we are processing your PI on the grounds of legitimate interests or for the performance of a task in the public interest (including profiling); or (ii) if we are processing your PI for direct marketing purposes
- **Correction**  
To request that we update the PI we process in relation to you, or to correct PI that you think is incorrect or incomplete.
- **Erasure**  
To ask that we delete PI that we process in relation to you where we do not have a legal or regulatory obligation or other valid reason to continue to process it.
- **Restriction**  
To request that we restrict the way in which we process your PI, for example, if you dispute the accuracy of your PI or have raised an objection which is under consideration.
- **Portability**  
To request a copy of your PI that you have provided to us in a commonly used electronic format such as through the completion of an application form.
- **Automated decision making**  
To request manual intervention if you are subject to automated decisions where the decision results in a legal or similar effect to you.



You may exercise your rights at any time by using the details set out in the Contacting us section. To the extent permitted by applicable law or regulation we reserve the right to charge an appropriate fee in connection with you exercising your rights.

We may need to request specific information from you to help us confirm your identity and ensure your right to access to the PI requested, or to exercise any of your other rights. This is to ensure that PI is not disclosed to any person who does not have authority to receive it. We may also request further information in relation to your request to help us to locate the PI processed in relation to you, including, for example, the nature and location of your relationship with us.

We will respond to all legitimate requests in line with the timescales set out in applicable law.

You will not be disadvantaged in any way by exercising your rights in relation to the processing of your PI.

#### Contacting us

The Global Head of Privacy and Data Protection oversees compliance with privacy and data protection at BlackRock. If you wish to exercise any of your rights, or have questions concerning this notice, please contact:

The Global Head of Privacy and Data Protection

BlackRock

12 Throgmorton Avenue

London

EC2N 2DL

Email: [GroupPrivacy@BlackRock.com](mailto:GroupPrivacy@BlackRock.com)

If you are a California resident, you may also call us on +1 855 371 0019.

#### Complaints

If you have any concerns or complaints about the way your PI is processed, please contact the Global Head of Privacy and Data Protection at [GroupPrivacy@BlackRock.com](mailto:GroupPrivacy@BlackRock.com). You also have a right to complain to a data protection or other competent authority with jurisdiction over privacy and data protection law in the country you live or work, or in the country where you believe an issue in relation to the processing of your PI has arisen. Please contact [GroupPrivacy@BlackRock.com](mailto:GroupPrivacy@BlackRock.com) for further details.

#### Cookie Notice

Please see our separate Cookie Notice.

#### Linked websites

This Privacy Notice is not applicable to third party websites that we do not own or control, or to any third-party website where BlackRock advertisements are displayed.

#### Changes to this Privacy Notice

We may modify or amend this Privacy Notice from time to time and you are advised to visit our website regularly to check for any amendments. Any material changes will be communicated to you through an appropriate channel, depending on how we normally communicate with you.

<sup>1</sup>Please note not all privacy laws define SPI, for example Hong Kong, Singapore and Canada

CANDRIAM WEBSITE/CLIENT PRIVACY NOTICE

Date of Issue : June 2021

Candriam Luxembourg (registered office: Serenity Bloc B, 19-21 route d'Arlon L-8009 Luxembourg), Candriam France (registered office: 40 rue Washington – 75008 Paris), Candriam Belgium (registered office: Avenue des Arts/ Kunstlaan 58, 1000 Brussels) and Candriam Switzerland (registered office: rue du 31 décembre 40-42, CH-1207 Geneva, Switzerland) and its subsidiaries (referred to collectively as "Candriam" or "we" or "our") is committed to respecting the privacy of individuals, including its clients.

Candriam owns and operates the web site <https://www.candriam.com>

This Privacy Notice ("Notice") sets out the basis on which Candriam processes personal data. Please read the following carefully to understand our views and practices regarding how we handle personal data.

For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the "GDPR"), each Candriam entity referred to above is the "data controller" of your personal data.

Candriam Switzerland, has appointed as EU representative for GDPR matters Candriam Group with registered address at 19-21 Route d'Arlon, L-8009 Strassen Luxembourg; registered no. R.C.S. Luxembourg : B 180524.

Personal Data We collect

We may collect and process the following personal data:

Information you give us:

If you are enquiring about Candriam capabilities or services (including when you are inquiring on behalf of your employer) then we may process your personal data - including your name, gender, address, personal or professional e-mail address and personal or professional phone number, financial information, personal description, photograph, ID documentation (including your passport or ID card), professional activity, marital status, information about your dependents or beneficiaries.

You and/or your employer may give us information about you during our due diligence of your employer, when you complete a form on our site or by corresponding with us by phone, e-mail or other electronic means, or in writing. This includes information you provide when you create an account on our site, subscribe to any of our services or reports, search our site, make enquiries, , submit information or content to our site, when you report a problem with our site or ask information via our site – including your name, email address, gender, professional activity postal address, telephone and fax.

If you are interested in participating in social and entertainment physical or digital event organized by Candriam to support our commercial activities, then we may process your personal data - including but not limited to your name, gender, address, personal or professional e-mail address.

Information we collect about you: With regard to each of your visits to our site we may automatically collect the following information:

technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products, services or issues you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.

Information we receive from other sources:

We may also receive information about you if you use any of the other websites we operate or the other services we provide.

We are part of a global group of companies which manage funds and provide other financial services. Where you have requested services which involve one or more of our subsidiaries and/ or affiliates, we will tell you, and we may receive relevant information from our subsidiaries and/ or affiliates for the purposes of those services.

We work closely with third parties (for example, banks and other financial institutions, business partners, legal or other consultants, sub-contractors in technical, analytics providers, search information providers,) and may receive information about you from them.

Information about other people: If you provide information to us about any person other than yourself, such as other employees of your employer, or persons accompanying you to social and entertainment physical or digital event organized by Candriam to support our commercial activities you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

Purposes and Legal Basis for processing

We may ask you for consent to collect or process your personal data on certain occasions, for example, and as stated below, where necessary in order to contact you with information about products and services or events that might be of interest to you or your employer.

We process your personal data when we need to do this to fulfil a contract with you, including processing your personal data to give effect to your investment in a Candriam fund, to verify your identity, or to otherwise provide services to you.

We process your personal data when required by law to do so, such as if we receive a request from law enforcement or other government officials.

We process your personal data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights. We have carried out balancing tests for all the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this Notice.

In particular:

we use your personal data in order to effectively administer the Candriam funds and our business;

we use your personal data to undertake commercial and legal due diligence on our clients and investors, in order to assess their activities and condition in relation to their investments and the provision of our services;

we monitor use of our websites, and use your personal data to help us monitor, improve and protect our services and websites, both online and offline;

we monitor investor accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law; and

we will use personal data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

We use your personal data or the personal data of the persons accompanying you in connection with the organization of social and entertainment physical or digital event to support our commercial activities.

Disclosure of Your Personal Data

We may share your personal data with our subsidiaries and/ or affiliates<sup>1</sup>.

Personal data will also be shared between the Candriam entities referred to above, which manage Candriam funds, and the Candriam fund legal entities which are SICAVs (Société d'investissement à Capital Variable).

We may also share your personal data with trusted third parties including:

Legal or other advisers, consultants and other professional experts, complainants, correspondents and enquirers, and suppliers and service providers of any of the above, and each of their associated businesses;

Business partners, suppliers and sub-contractors only for the purposes of performance of any contract we enter into with them or you or your employer. We take reasonable steps to ensure that our staff protect your personal data, and are aware of their information security obligations; and Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal data to third parties:

If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;

If Candriam, its business, or its assets are acquired by a third party, in which case personal data held by it about its users, suppliers, or customers will be one of the transferred assets;

If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce agreements; or if we reasonably consider this necessary; or to protect the rights, property, or safety of Candriam, our users, our customers, or others; and

For the purposes of crime prevention and fraud protection.

Marketing Communications

We, or trusted third parties on our behalf, may contact you by email or other electronic means or post with information about products, services and events that might be of interest to you. Where necessary, at the time that you provide your personal data to us, you will be given the opportunity to indicate whether or not you are happy for us to use your personal data in order to tell you about such products or services or events.

You can unsubscribe from this at any time by emailing us using the contact details provided below.

Where We Store Your Personal Data and How We Protect it

Some of the Candriam subsidiaries and/or affiliates and third parties to whom Candriam discloses your personal data (as described above) may be located in countries which are located in any country of the European Union but also countries outside EEA that do not provide a level of protection to personal data equivalent to that provided by your home country.

In order to provide adequate protection for these transfers, Candriam utilizes transfer mechanisms recognized by your home country, which may include executing appropriate contractual clauses based on and conforming to the EU model clauses. To obtain a copy of the transfer mechanism, please contact us using the details provided below.

We take reasonable steps to protect your personal data from loss or destruction.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Your Rights

You have various rights with respect to our use of your personal data:

**Access:** You have the right to request a copy of the personal data that we hold about you. Please note that there are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. You are entitled to see the personal data held about you. If you wish to do this, please contact us using the contact details provided below.

**Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date. You can also review and correct/update some of your personal data by logging-in to your account on our site.

**Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us using the contact details provided below.

**Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.

**Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority or to seek a remedy through the courts.

Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data.

As a reminder, in France by application of article 40-1 of the Law n°78-17 of 6 January 1978 on Information Technology, Data Files and Civil Liberties, you have also the right to give instructions on the management of your personal data after your death.

When we ask you to supply us with personal data we will attempt to make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you or your employer, or whether the supply of any personal data we ask for is optional.

#### How Long We Keep Your Personal Data

We will retain your personal data for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Personal data collected will be retained pursuant to our record retention policy, and in most instances will not be retained longer than ten (10) years from the date of last use.

#### Changes to our Privacy Notice

Any changes we may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.

#### Contact Details

If you wish to exercise any of your legal rights, write to us at [DPO@\[candriam.com\]](mailto:DPO@[candriam.com]).

<sup>1</sup>List of subsidiaries and affiliates are available on the following link:

<https://www.candriam.be/en/professional/legal-and-disclaimer/legal-information/>

# Privacy

## 1. Background

1.1 This Privacy Notice explains how Jupiter Fund Management Plc, its subsidiaries and its affiliates, and/or any funds operated or managed by them (referred to collectively as “Jupiter” “we”, “us” or “our”), each a controller, collect and process certain Personal Data. Jupiter is responsible for ensuring that it uses that Personal Data in compliance with data protection laws.

1.2 At Jupiter we respect the privacy of individuals and we are committed to keeping all your Personal Data secure. This Privacy Notice (“notice”) applies to individuals outside our organisation with whom we interact, including but not limited to visitors to our website; clients and their personnel; vendors and service providers; visitors to our offices; and registrants for Jupiter events (together, “you”).

1.3 We use the following definitions in this Privacy Notice:

“Personal Data” means any data which relates to a living individual who can be identified from that data or from that data and other information which is in the possession of, or is likely to come into the possession of, Jupiter (or its representatives or service providers). In addition to factual information, it includes any expression of opinion about an individual and any indication of the intentions of Jupiter or any other person in respect of an individual.

## 2. The products and services we provide

2.1 This Privacy Notice concerns the following categories of information that we collect about you when providing the following products and services (together, the “services”):

(A) Information we receive through our websites (“Jupiter Websites”);

(B) Information we receive through our products (“Jupiter Products”);

(C) Information we receive through our support, mobile security solution or cloud-based services (“Jupiter Services”).

## 3. The types of personal data we collect

3.1 Many of the services offered by Jupiter require us to obtain Personal Data about you in order to perform the services we have been engaged to provide. In relation to each of the services described at section 2.1 above, we will collect and process the following Personal Data about you:

### Information that you provide to Jupiter.

This includes information about you that you provide to us. The nature of the services you are requesting will determine the kind of Personal Data we might ask for, though such information may include (by way of a non-exhaustive list):

- basic Personal Data (such as first name; family name; job title; company name; company email address; business phone number; business address; city; postcode; country).

### Information that we collect or generate about you.

This includes (by way of non-exhaustive list):

- a file with your client records and contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you; and
- details of site and marketing/communication preferences.

## Information we obtain from other sources.

This includes:

### Cookies

- When you visit Jupiter Websites, cookies are used to collect information about the services that you use, and how you use them. Cookies are essentially a small amount of data which is transferred to and sometimes updated on your computer or other devices by our web servers.
- For more information on the cookies used by Jupiter please see our Cookie Policy on our website.

### Analytics

- We may obtain publicly available data from social media as part of our use of analytics tools provided by social media sites, including Twitter. We do not deliberately identify individuals in these data sets (although they may contain some Personal Data) and do not combine it with other data. We do not share this data with any third parties.

### Anonymised data

- In addition to the categories of Personal Data described above, Jupiter will also process further anonymized information and data that is not processed by reference to a specific individual.

## 4. How we use your information

4.1 Your Personal Data may be stored and processed by us in the following ways and for the following purposes:

- for ongoing review and improvement of the information provided on Jupiter Websites to ensure they are user friendly and to prevent any potential disruptions or cyber-attacks;
- to conduct analysis required to detect malicious data and understand how this may affect your IT system;
- for statistical monitoring and analysis of current attacks on devices and systems and for the on-going adaptation of the solutions provided to secure devices and systems against current attacks;
- for in-depth threat analysis;
- to understand your needs and interests, including to tailor the content of our marketing;
- for the management and administration of our business;
- for market analysis;
- to allow you to use and access the functionality provided by the Jupiter Products;
- to assess your application for Jupiter Products, where applicable;
- to set up customers to use Jupiter Products;
- to understand feedback on Jupiter Products and to help provide more information on the use of those products and services quickly and easily;
- to communicate with you in order to provide you with services or information about Jupiter and Jupiter Products;
- in order to comply with and in order to assess compliance with applicable laws, rules and regulations, and internal policies and procedures; or
- for the administration and maintenance of databases storing Personal Data.

4.2 However we use Personal Data we make sure that the usage complies with law and the law allows us and requires us to use Personal Data for a variety of reasons, including but not limited to the following:

- in order to perform our contractual obligations;
- where we have obtained your consent;
- where we have legal and regulatory obligations that we have to discharge;

- where we may need to do so in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- the use of your Personal Data as described is necessary for our legitimate business interests, such as:
  - allowing us to effectively and efficiently manage and administer the operation of our business;
  - analysing market events;
  - marketing our products and services;
  - maintaining compliance with internal policies and procedures;
  - monitoring the use of our copyrighted materials;
  - enabling quick and easy access to information on Jupiter Products;
  - offering optimal, up-to-date security solutions for mobile devices and IT systems; and
  - obtaining further knowledge of current threats to network security in order to update our security solutions and provide these to the market.

4.3 We will take steps to ensure that the Personal Data is accessed only by employees of Jupiter that have a need to do so for the purposes described in this Privacy Notice.

## **5. Disclosure of your information to third parties**

5.1 We may share your Personal Data within the Jupiter Group for the purposes described above. This will include our subsidiaries and affiliated companies.

5.2 We may also share your Personal Data outside of the Jupiter Group for the following purposes:

- with other trusted businesses or persons for the purpose of processing personal data on our behalf for the above stated purposes. These will include any depository, stock exchange, clearing or settlement system, counterparties, dealers, custodians and others where disclosure of your Personal Data is reasonably intended for the purpose of effecting, managing or reporting transactions or establishing a relationship with a view to such transactions;
- with our business partners. For example, this could include our partners from whom you or your company or your organisation purchased the Jupiter product(s). Personal Data will only be transferred to a business partner who is contractually obliged to comply with appropriate data protection obligations and the relevant privacy and confidentiality legislation;
- with third-party agents and contractors for the purposes of providing services to us (for example, Jupiter's accountants, professional advisors, IT and communications providers, credit reference agencies and debt collectors). These third parties will be subject to appropriate data protection obligations and they will only use your Personal Data as described in this Privacy Notice;
- with representatives, agents, custodians, intermediaries and/or other third party product providers appointed by the Client or prospective Client (such as accountants, professional advisors, custody service providers and product providers);
- 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 obligation (including, without limitation, in order to comply with tax reporting requirements and disclosures to regulators), or to establish, exercise or defend its legal rights;
- if we sell our business or assets, in which case we may need to disclose your Personal Data to the prospective buyer for due diligence purposes; and
- if we are acquired by a third-party, in which case the Personal Data held by us about you will be disclosed to the third-party buyer.
- where you are a joint account or portfolio holder (or otherwise one of multiple persons holding an account or portfolio), we may disclose your Personal Data to the other joint account or portfolio holder or other person.

## 6. International transfers of personal data

6.1 Jupiter is a global business. Our customers and our operations are spread around the world. As a result we collect and transfer Personal Data on a global basis. That means that we may transfer your Personal Data to locations outside of your country.

6.2 Where we transfer your Personal Data to another country, we will ensure that it is protected and transferred in a manner consistent with legal requirements. In relation to data being transferred outside of Europe, for example, this may be done in one of the following ways:

- the country that we send the data to might be approved as offering an adequate level of protection for Personal Data;
- the recipient might have signed up to a contract based on “standard contractual clauses” obliging them to protect your Personal Data; or
- in other circumstances the law may permit us to otherwise transfer your Personal Data outside Europe.

6.3 You can obtain more details of the countries we transfer data to and of the protection given to your Personal Data referred to above (including a copy of the standard data protection clauses which we have entered into with recipients of your Personal Data) by contacting us as described in section 10 below.

## 7. How we safeguard your information

7.1 We have extensive controls in place to maintain the security of our information and information systems. Appropriate controls (such as restricted access) are placed on our computer systems. Physical access to areas where Personal Data is gathered, processed or stored is limited to authorised employees.

7.2 As a condition of employment, Jupiter employees are required to follow all applicable laws and regulations, including in relation to data protection law. Unauthorised use or disclosure of confidential client information by a Jupiter employee is prohibited and may result in disciplinary measures.

## 8. How long we keep your personal data

8.1 How long we will hold your Personal Data for will vary and will be determined by the following criteria:

- the purpose for which we are using it – Jupiter 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.

## 9. Your rights

9.1 In all the above cases in which we collect, use or store your Personal Data, you may have the following rights and, in most cases, you can exercise them free of charge. 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 the processing of your Personal Data at any time. Please note, however, that we may still be entitled to process your Personal Data if we have another legitimate reason for doing so. For example, we may need to retain Personal Data to comply with a legal obligation;
- 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 directly to Jupiter; 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, or request that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are

legally entitled to refuse that request; and the right to lodge a complaint with the relevant data protection regulator if you think that any of your rights have been infringed by us.

9.2 You can exercise your rights by contacting us using the details listed in section 10 below.

## **10. Questions and concerns**

10.1 If you have any questions or concerns about Jupiter's handling of your Personal Data, or about this notice, please contact us using the following contact information:

Address: The Zig Zag Building, 70 Victoria Street, London, SW1E 6SQ

Email Address: [DPO@jupiteram.com](mailto:DPO@jupiteram.com)

We are usually able to resolve privacy questions or concerns promptly and effectively. If you are not satisfied with the response you receive, you may escalate concerns to the applicable privacy regulator in your jurisdiction. Upon request, we will provide you with the contact information for that regulator.

[Download Privacy Policy](#)