

NEW STREET RESEARCH LLP PRIVACY POLICY

Introduction

New Street Research LLP (“we,” “us,” “our”) is committed to protecting your privacy and personal data. This Privacy Policy outlines how we collect, use, store, and protect your personal information when you visit our website or engage with our services. We are authorized and regulated by the Financial Conduct Authority (FCA).

Controller

New Street Research LLP is the controller and responsible for your personal data (collectively referred to as "we", "us" or "our" in this privacy policy). We have appointed a data privacy manager who is responsible for overseeing all privacy-related inquiries. For questions or to exercise your legal rights, please contact the data privacy manager using the details provided below.

Policy updates and your duty to inform us of changes

We regularly review this privacy policy and historical versions can be requested from us. 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.

Third-party links

Our website may include links to third-party websites, plug-ins or applications. Clicking on those links 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.

1. The data we collect about you

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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data:** includes first name, last name, username or similar identifier and title
- **Contact Data:** includes company name, billing address, email address and telephone numbers.
- **Profile Data:** includes your username and password, your interests, preferences, feedback and survey responses.
- **Usage Data:** includes information about how you use our website, products and services.
- **Technical Data:** includes login information, browser type, time zone setting, and other technology on the devices you use to access this website
- **Marketing Data:** your preferences for receiving communications from us.

We may also collect, use and share **Aggregated Data** which 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. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific product or website feature. 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.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union

membership, information about your health, and genetic and biometric data or criminal convictions and offences).

2. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** When you subscribe to our services, create an account, request marketing materials, fill out a form or communicate with us by post, phone, email, or in person.
- **Automated technologies or interactions.** When you interact with our website, we collect Technical Data such as your browsing behaviour, equipment details, and usage patterns via cookies and similar technologies.
- **Third parties or publicly available sources.** We may receive data from third-party sources, such as analytics providers (e.g., Google) or publicly available sources like Companies House in the UK.

3. How we use your personal data

We will only use your personal data in compliance with the law, primarily for the following purpose:

- **Contractual Obligations:** To perform or enter into contracts with you.
- **Legitimate Interests:** Where necessary for our legitimate interests (or those of a third party), and where your rights and interests do not override them.
- **Legal Obligations:** To comply with applicable laws or regulatory requirements.

Generally, we do not rely on consent as a legal basis for processing your personal data. You have the right to withdraw consent to at any time by contacting us.

Website visitors: We use Google Analytics to collect non-identifiable information about visitor behaviour and website usage. We do not attempt to discover the identities of website visitors. If we need to collect personal information via the website, we will clearly explain the purpose and intended use.

Use of cookies: Cookies are small text files used to collect information about how visitors interact with our website and to facilitate access to our research portal. You can adjust your browser settings to refuse cookies; however, this may affect website functionality.

People who email us: Emails sent to us, including attachments, may be monitored for security and compliance purposes. Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with office policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

Providing services: We process personal data solely for the purpose of providing the appropriate products and services requested by individuals (Data Subjects).

Security and performance: We use a third-party service to ensure website security and performance, which may process visitor IP addresses.

Complaints: If you make a complaint, we will process the personal information needed to handle it, including disclosing the complainant's identity when necessary. We may share complaint details with our professional indemnity insurers, the Financial Ombudsman Service, and report analytics (without personal identifiers) to the Financial Conduct Authority (FCA).

Change of purpose: We will only use your personal data for the original purpose unless a compatible, lawful reason arises for further use. We will notify you if the data needs to be used for an unrelated purpose, explaining the legal basis. We may process personal data without your consent when required by law.

4. Disclosures of your personal data

We may share your personal data with the parties set out below:

- **Internal Third Parties:** Other companies in the New Street Research Group acting as joint controllers or processors and who are based Singapore and the USA and have access to our server platform.
- **External Third Parties:**
 - Service providers acting as processors who provide IT, system administration and security services.
 - Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, regulatory, insurance and accounting services.
 - Regulators and other authorities such as HM Revenue & Customs, acting as processors or joint controllers who require reporting of processing activities in certain circumstances.
 - Third party servers such as Microsoft Corporation, Salesforce and Amazon Web Services (all based in the USA).
 - Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

5. International transfers

We share your personal data within the New Street Research Group to ensure proper service delivery. This will involve transferring your data outside the UK. We ensure adequate safeguards are in place, including data transfer arrangements with third-party providers outside the UK, including Microsoft, Salesforce and Amazon Web Services.

6. Data security

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.

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.

7. Data retention

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.

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

Financial Conduct Authority regulations require us to keep details of client instructions, identity and contact information for at least 5 years.

We keep information about complaints for a period of 5 years from closure of the complaint file.

In some circumstances you can ask us to delete your data: see below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights.

If you wish to exercise any of the rights set out above, please contact us.

- **No fee usually required:** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.
- **What we may need from you:** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.
- **Time limit to respond:** We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Contact us

For questions or concerns, contact our Data Privacy Manager:

Email: compliance@newstreetresearch.com
 Phone: +44 20 7375 9111
 Website: newstreetresearch.com

If you feel that we have not addressed your concerns, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) (www.ico.org.uk).