

UK/EU PRIVACY POLICY

BACKGROUND

GBST Holdings Ltd ACN 010 488 874 and its wholly owned subsidiaries (“GBST” or “We”, “Our” or “Us”) is committed to your privacy and safeguards your personal information carefully. We respect and value the privacy of everyone who visits this website, www.gbst.com (“Our Site”) and will only collect and use Personal Data in ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

This Privacy Policy explains the kinds of personal information we collect, the purposes for which it is collected, how personal information is stored, who it is disclosed to and how to contact us to either access or correct any personal information or to make a privacy related complaint.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site. If you do not accept and agree with this Privacy Policy, you must stop using Our Site immediately.

1. Definitions and Interpretation

In this Privacy Policy, the following terms shall have the following meanings:

“Account”	means an account required to access and/or use certain areas and features of Our Site;
“Cookie”	means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out in section 11 below;
“Cookie Law”	means the relevant parts of the Privacy and Electronic Communications (EC Directive) Regulations 2003;
“Personal Data”	means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, it means personal data that you give to Us via Our Site. This definition shall, where applicable, incorporate the definitions provided in the EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).

2. Information About Us

2.1 Our Site is owned and operated by GBST Holdings Limited ACN 010 488 874 (“**Holding Company**”) which is the ultimate parent company of:

- GBST Wealth Management Limited (06663089);
- GBST Hosting Limited (06663152);
- GBST UK Holdings Limited (06662908); and
- GBST Limited (08816145),

whose registered addresses are Building 3 Hatters Lane, Croxley Green Business Park, Watford, Hertfordshire WD18 8YG, and whose main trading address is 8th Floor Linen Court, 10 East Road, London N1 6AD.

2.2 Our Privacy Officer can be contacted by email at privacyofficer@gbst.com, or by post at 8th Floor Linen Court, 10 East Road, London N1 6AD.

3. **What Does This Policy Cover?**

This Privacy Policy applies only to your use of Our Site. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them.

4. **Your Rights**

4.1 As a data subject, you have the following rights under the GDPR, which this Privacy Policy and Our use of Personal Data have been designed to uphold:

4.1.1 The right to be informed about Our collection and use of Personal Data;

4.1.2 The right of access to the Personal Data We hold about you (see section 10);

4.1.3 The right to rectification if any Personal Data We hold about you is inaccurate or incomplete (please contact Us using the details in section 12);

4.1.4 The right to be forgotten – i.e. the right to ask Us to delete any Personal Data We hold about you (We only hold your Personal Data for a limited time, as explained in section 6 but if you would like Us to delete it sooner, please contact Us using the details in section 12);

4.1.5 The right to restrict (i.e. prevent) the processing of your Personal Data;

4.1.6 The right to data portability (obtaining a copy of your Personal Data to re-use with another service or organisation);

4.1.7 The right to object to Us using your Personal Data for particular purposes; and

4.1.8 Rights with respect to automated decision making and profiling.

4.2 If you have any cause for complaint about Our use of your Personal Data, please contact Us using the details provided in section 12 and We will do Our best to solve the problem for you. If We are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

4.3 For further information about your rights, please contact the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; Telephone: 0303 123 1113; Email: casework@ico.org.uk or your local Citizens Advice Bureau.

5. **What Data Do We Collect?**

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal data (please also see section 11 on Our use of Cookies and similar technologies):

5.1 name;

5.2 business/company name

- 5.3 contact information such as postal address, residential address, email addresses and telephone numbers;
- 5.4 IP address;
- 5.5 web browser type and version;
- 5.6 operating system; and
- 5.7 a list of URLs starting with a referring site, your activity on Our Site, and the site you exit to.

6. **How Do We Use Your Data?**

- 6.1 All Personal Data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.
- 6.2 Our use of your Personal Data will always have a lawful basis, either because it is necessary for Our performance of a contract with you, because you have consented to Our use of your Personal Data (e.g. by submitting an enquiry through Contact Us) or because it is in Our legitimate interests. Specifically, We may use your data for the following purposes:
 - 6.2.1 Providing and managing your access to Our Site;
 - 6.2.2 Personalising and tailoring your experience on Our Site;
 - 6.2.3 Personalising and tailoring Our services for you; and
 - 6.2.4 Replying to emails or enquiries from you.
- 6.3 Third parties (including Taleo.com) whose content appears on Our Site when using GBST Cloud Recruitment Portal (i.e. Careers) may use third party Cookies, as detailed below in section 11.11. Please refer to section 11 for more information on controlling Cookies. Please note that We do not control the activities of such third parties, nor the data they collect and use and advise you to check the privacy policies of any such third parties.
- 6.4 You have the right to withdraw your consent to Us using your Personal Data at any time, and to request that We delete it.
- 6.5 We do not keep your Personal Data for any longer than is necessary in light of the reason(s) for which it was first collected. The precise length of time will depend on the type of data, our legitimate business needs and other legal or regulatory rules that may require us to retain it for certain minimum periods. In determining the appropriate retention period for different types of Personal Data, we always consider the amount, nature, and sensitivity of the Personal Data in question, the potential risk of harm from unauthorised use or disclosure of that Personal Data, the purposes for which we need to process it and whether we can achieve those purposes by other means (in addition of course to ensuring that we comply with our legal, regulatory and risk-management obligations, as described above).

7. **How and Where Do We Store Your Data?**

- 7.1 We only keep your Personal Data for as long as We need to in order to use it as described above in section 6 and/or for as long as We have your permission to keep it.
- 7.2 Some or all of your Personal Data may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus

Norway, Iceland and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store Personal Data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

- 7.3 We care about protecting your information and we have put in place appropriate measures that are designed to prevent unauthorised access to, and misuse of, your Personal Data. These include measures to deal with any suspected data breach.
- 7.4 We are committed to taking all reasonable and appropriate steps to protect the Personal Data that we hold from misuse, loss, or unauthorised access. We do this by having in place a range of appropriate technical and organisational measures.

8. **Do We Share Your Data?**

- 8.1 We may share your Personal Data with other companies within Our corporate group but only for the purpose for providing services to our clients, improving our services, replying to enquiries, conducting our internal business operations, including meeting any relevant regulatory or legal requirements etc.
- 8.2 We may sometimes contract with third parties to supply services to you on Our behalf. In some cases, the third parties may require access to some or all of your Personal Data. Where any of your Personal Data is required for such a purpose, We will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, Our obligations, and the obligations of the third party under the law.
- 8.3 We may compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, and other information. All such data will be anonymised and will not include any Personal Data, or any anonymised data that can be combined with other data and used to identify you. Data will only be shared and used within the bounds of the law.
- 8.4 In certain circumstances, We may be legally required to share certain Personal Data held by Us, for example, where We are involved in legal proceedings, where We are complying with legal requirements, a court order, or a governmental authority.

9. **Your Right to Withhold Information**

- 9.1 You may access certain areas of Our Site without providing any Personal Data at all.
- 9.2 You may restrict Our use of Cookies. For more information, see section 11.

10. **How Can You Access Your Data?**

We will provide any and all information in response to your request concerning your Personal Data free of charge. Please contact Us for further details at privacyofficer@gbst.com or use the contact details below in section 12.

11. **Our Use of Cookies**

- 11.1 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. We have carefully chosen these

Cookies and have taken steps to ensure that your privacy and Personal Data is protected and respected at all times.

- 11.2 By using Our Site, in particular when applying for employment vacancies through the GBST Cloud Recruitment Portal (i.e. Careers) you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. For more details, please refer to section 6, above, and to section 11.6 below. These Cookies are not integral to the functioning of Our Site and your use and experience of Our Site will not be impaired by refusing consent to them.
- 11.3 All Cookies used by and on Our Site are used in accordance with current Cookie Law.
- 11.4 Before Cookies are placed on your computer or device, you will be shown a pop-up requesting your consent to set those Cookies. By giving your consent to the placing of Cookies you are enabling Us to provide the best possible experience and service to you. You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.
- 11.5 Certain features of Our Site depend on Cookies to function. Cookie Law deems these Cookies to be “strictly necessary”. These Cookies are explained further below. Your consent will not be sought to place these Cookies, but it is still important that you are aware of them. You may still block these Cookies by changing your internet browser’s settings as detailed below in section 11.10, but please be aware that Our Site may not work properly if you do so. We have taken great care to ensure that your privacy is not at risk by allowing them.
- 11.6 GBST web servers may generate session Cookies and/or persistent Cookies.
- 11.7 The following first party Cookies may be placed on your computer or device:
 - i. Session Cookies, if and when generated, are stored in your browser’s memory and are destroyed automatically when you close the browser. The Cookies exist only for the time you are accessing our server, and when you close your browser at the end of your interaction with Our Site the Cookies are no longer existing on your computer and cannot be used for further identification of your machine.
 - ii. Persistent Cookies, if and when generated, are stored on your web browser and are deleted by your browser at a later date. They store your preferences and/or configurations for your convenience and ease of use of Our Site.
- 11.8 Both types of Cookie are transmitted to and from your browser automatically as part of your access to Our web servers. This access is predominantly via SSL (Secure Sockets Layer) and so the Cookies are encrypted between your browser and Our web servers.
- 11.9 All Cookies are used solely for the purposes of maintaining your favourite settings, optimisation of Our Site and/or ensuring only authorised access is possible to your Account. GBST does not use the information contained therein for any other purpose.
- 11.10 You can configure your browser to accept all Cookies, reject all Cookies or alert you when a Cookie is sent. If you disable the use of Cookies on your web browser or remove or reject Cookies from Our Site or linked sites, then you

may not be able to gain access to the content and facilities in those web sites.

11.11 Our Site may place and access certain first party Cookies on your computer or device. First party Cookies are those placed directly by Us and are used only by Us. We use Cookies to facilitate and improve your experience of Our Site and to provide and improve Our services. By using Our Site, you may also receive certain third-party Cookies on your computer or device. Third party Cookies are those placed by websites, services, and/or parties other than Us. Third party Cookies are used on Our Site for accessing the Careers link on Our Site and when creating an Account and submitting an application for a potential employment vacancy through the GBST Cloud Recruiting Portal.

12. **Contacting Us**

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at privacyofficer@gbst.com, or by post at 8th Floor Linen Court, 10 East Road, London N1 6AD. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

13. **Changes to Our Privacy Policy**

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on Our Site and you will be deemed to have accepted the terms of the Privacy Policy on your first use of Our Site following the alterations. We recommend that you check this page regularly to keep up-to-date.