

SVB Financial Group Global Privacy Notice

Effective as of September 30, 2019

SVB Financial Group provides diversified financial services to emerging, growth and established technology companies and to the life science, cleantech, venture capital, private equity and to premium wine markets. SVB Financial Group's businesses and divisions include Silicon Valley Bank, SVB Capital, SVB Analytics, SVB Private Bank a division of Silicon Valley Bank, SVB Wealth Advisory, Inc. and other affiliated organizations.

This Privacy Notice ("Notice") applies to your interaction with SVB Financial Group or any of its subsidiaries (collectively, "SVB," "we," "us," "our"). Additional terms and conditions may apply to certain services provided by us.

SVB is headquartered in Santa Clara, California, USA. SVB serves clients around the world through its offices in the United States and international branches or subsidiaries in the UK, Germany, Canada, Israel, India and China.

For our US Private Bank and Wealth Advisory Privacy Notice [click here](#).
For US individual customers the Privacy Notice can be [found here](#).

SVB respects your privacy and is committed to protecting your personal data. This Notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you. It also applies to the personal data we hold in relation to certain third parties (for example, our clients' beneficial owners), so if you are an SVB client or prospective client and provide us with personal data on behalf of beneficial owners or other third parties, you should provide them with this Notice so that they understand how we deal with their personal data.

To download this Notice [click here](#). Please use the Glossary to understand the meaning of some of the terms used in this Notice.

1. IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Notice

This Notice aims to give you information on how SVB collects and processes your personal data, including data collected when you visit any online or mobile site or application that we own and control (collectively, "Site") or otherwise interact with SVB.

Our Site and services are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This Notice supplements the other notices and is not intended to override them.

Controller

SVB Financial Group is made up of different legal entities and this Notice is issued on behalf of the SVB Financial Group so when we mention "SVB", "we", "us" or "our" in this Notice, we are referring to the company in the SVB Financial Group that you have a relationship with or otherwise interact with.

Agreement to Notice

By using this Site or interacting with SVB, you consent to this Notice, including your consent to our use and disclosure of information about you in the manner described in this Notice.

Historic versions of this Notice can be obtained by contacting 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

This Site 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 are not responsible for information collection practices of non-SVB Financial Group links you click on at our Site. These third parties may have very different privacy policies and we encourage you to review their practices before providing them with any personal data.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an identifiable individual. It does not include data where the individual is not capable of being identified from the data (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, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- Contact Data includes postal address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Transaction Data includes details about payments to and from your bank accounts with us or other details of products and services you have purchased from us.
- Device Data includes internet protocol (IP) address, your login data, the domain and host from which you access the Internet, the date and time you access our Site, browser and operating system information and the Internet address of the site from which you linked to our Site on the devices you use to access this Site.
- Profile Data includes your username and password, your transactions, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our Site, products and services.
- Marketing and Communications Data includes correspondence and other communications (including lawfully-recorded telephone communications data) for the purposes of providing client support, your communication preferences and your preferences in receiving marketing material from us and our third parties.
- We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific 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 Notice.

If you use SVB's mobile application, additional information may be collected from your device including unique device identifiers for your mobile device, your screen resolution and other device settings, information about your location and analytical information about how you use your mobile device. We may ask your permission before collecting certain information (such as precise geo-location information) through SVB's mobile application.

For individuals resident in the EEA, we do not collect any Special Categories of Personal Data about you such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data; nor do we collect any information about criminal convictions and offences.

Failure to provide personal data

Where we need to collect personal data by law or under the terms of a contract we have with our clients, 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 (for example, to provide our client with banking services). In this case, we may have to cancel a product or service but we will notify you if this is the case at the time.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

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

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Apply to open a bank account with us and receive banking or other services on behalf of your employer (our client);
 - Create an account on our Site on behalf of your employer (our client);
 - Sign up to use our services or receive our publications on behalf of your employer (our client);
 - Request marketing material to be sent to you;
 - Complete a survey or questionnaire; or
 - Give us some feedback.
- Automated technologies or interactions. As you interact with our Site, we may automatically collect device data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Device Data about you if you visit other websites employing our cookies. Please see our cookie policy at <https://www.svb.com/cookie-policy/> for further details.
- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - Device Data from the following parties (for a complete list of third party vendors, see our cookie policy at <https://www.svb.com/cookie-policy/>):
 - analytics providers such as Google Analytics, Episerver, ACI, Threatmetrix and Munchkin;
 - advertising networks such as Google and The Trade Desk; and
 - third party providers who provide us with functionality information such as AddThis, Microsoft and Trusteer.
- Contact, financial and transaction data from providers of technical, payment and delivery services.
- Identity and contact data from publicly available sources such as Companies House and the Electoral Register.
- Identity and Contact Data from social media sites such as Facebook®, LinkedIn® and Twitter®.
- Identity, Contact and Financial Data from government agencies, credit reference and financial crime prevention agencies, consumer reporting agencies and other suppliers of public information.
- Identity and Contact Data from specialist data and research companies such as PitchBook.
- Identity, Contact and Marketing and Communications Data from corporate sponsors who we work with such as event partners.

Submitting personal information on behalf of others

If you submit any personal data relating to other people to us or to our service providers in connection with our products and services (for example, if you provide us with personal data on beneficial owners) you confirm that you have the authority to do so and will provide the person that you have provided personal data on behalf of, a copy of this Notice.

4. HOW DO WE USE YOUR PERSONAL DATA?

A. For individuals not resident in the EEA

We use your personal information in various ways including for the following purposes:

- To provide you or your employer with or evaluate your or your employer's eligibility for products and services that you or your employer requests;
- To perform ordinary business operations (e.g. opening and maintaining your account, managing payments, fees and charges, collecting amounts owing to us or processing your transactions against those accounts);
- To manage our relationship with you and your employer;
- To develop, evaluate, and improve our products and services;
- To perform data analytics;
- To comply with legal and regulatory obligations, including those intended to prevent money laundering;
- To effect risk control;
- To effect anti-fraud and information security measures;
- To enhance the customer experience (e.g. to allow you to change web pages without having to re-enter your password and to store your preferences and other information);
- To track activity on our Site;
- To improve the operation of the web site and the running of our business; and
- To market our other services to you.

Marketing

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think our clients may want or need, or what may be of interest to our clients. This is how we decide which products, services and offers may be relevant for our clients (we call this marketing). You will receive marketing communications from us if you have requested information from us or signed up to receive a service from us and, in each case, you have not opted out of receiving that marketing.

B. For individuals resident in the EEA or Individuals with SVB Cayman Island Funds

Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where we need to comply with a legal or regulatory obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

See Glossary in Section 15 to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending direct marketing communications to you. You have the right to withdraw consent to marketing at any time by contacting us.

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

Note that we may process your personal data on 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 for processing including basis of legitimate interest
To register your employer as a new client	(a) Identity (b) Contact	Performance of a contract with your employer (our client)
To provide banking and other services to your employer (our client): (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contact with your employer (our client) (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with your employer (our client) which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to [leave a review or] take a survey	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with your employer (our client) (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how clients use our products/services)

To enable you to partake in a competition or complete a survey	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications	(a) Performance of a contract with your employer (our client) (b) Necessary for our legitimate interests (to study how clients use our products/services, to develop them and grow our business)
To administer and protect our business and this Site (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Device	(a) 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) (b) Necessary to comply with a legal obligation
To deliver relevant Site content and marketing to you and measure or understand the effectiveness of the marketing we serve to you	(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Device	Necessary for our legitimate interests (to study how clients use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our Site, products/services, marketing, client relationships and experiences	(a) Device (b) Usage	Necessary for our legitimate interests (to define types of clients for our products and services, to keep our Site updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about products/services that may be of interest to you	(a) Identity (b) Contact (c) Device (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

C. Cookies, Advertising Networks and Social Media Platforms

Third-party ad networks

SVB may work with third party ad networks to provide targeted ads on our own Site or third party sites. For example, we use third party network advertisers such as The Trade Desk (opt out and information available [here](#)) to serve advertisements on our own Site, third-party websites or other media (e.g. social media platforms). This enables us and these third parties to target advertisements to you for products and services in which you might be interested. Third-party ad

network providers, advertisers, sponsors and/or traffic measurement services may use cookies, JavaScript, web beacons (including clear GIFs), Flash LSOs and other tracking technologies to measure the effectiveness of their ads and to personalize advertising content to you. These third-party cookies and other technologies are governed by each third party's specific privacy policy, not this one. We may provide these third-party advertisers with information about your activities on our Site.

For information about the third parties we work with for advertising and analytics purposes and the choices you may have, please see our cookie information page [here](#).

Do-Not-Track

Currently, our systems do not recognize browser "do-not-track" requests. You may, however, disable certain tracking (e.g. by disabling cookies); you also may opt-out of targeted advertising by following the instructions in the Third Party Ad Network section.

Social Media Platforms

We may interact with registered users of various social media platforms including, but not limited to, Facebook®, LinkedIn® and Twitter®. Any content you post to such social media platforms, such as pictures, information, opinions, or any personal information that you make available to users on these social platforms, is subject to the terms of use and privacy policies of those respective platforms. We recommend that you review them to better understand your rights and obligations with regard to such content.

Cookies

We use tracking technologies such as cookies and web beacons to help us measure the effectiveness of our Sites, how visitors use them and to help keep your transactions secure as you bank online with us. Cookies are small text files downloaded and stored by your browser when you visit a web site. Accepting a cookie does not provide us access to your computer. The type of information we collect using cookies includes pages visited on our sites, and whether you are a new or a returning visitor.

For more information on cookies and how to manage them, you may look at the Electronic Privacy Information Center's cookie page at www.epic.org/privacy/internet/cookies/.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this Site may become inaccessible or not function properly. For more information about the cookies we use, please see <https://www.svb.com/cookie-policy/>.

D. Opting-out of Marketing

You can ask us to stop sending you marketing messages at any time by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to our use of personal data for the purposes of providing banking or other financial services to you or where we have another lawful basis for processing the data.

E. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in Section 4 above and such sharing of your personal data may continue when you are a former customer:

- Internal third parties in the SVB Financial Group and who are based in the US, UK, Canada, Germany, Israel, China, Hong Kong, India or have Cayman Islands and provide IT and system administration services.
- External Third Parties as set out in the Glossary.
- 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 Notice.

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.

We may share information with other organizations and public bodies, including law enforcement agencies to prevent and detect fraud. We may also check and/or file details with fraud prevention agencies and databases.

Your anonymous information (i.e. not personal data), collected using cookies and web beacons, is shared with a third-party analytics company to provide us with information about how visitors use our sites. We use this information to help us learn things like what pages are most attractive to our visitors, what products our clients are interested in, and what kinds of offers they like to see.

We do not share your personal information with non-affiliated third parties so they can market to you without your consent. Additionally, we do not share your personal information with our affiliates for marketing purposes, except that for US clients, SVB Private Bank and Wealth Advisory, Inc. may reciprocally share information about clients for purposes of cross-marketing. Should these marketing practices change, we will seek your consent before sharing your personal information and provide a means for you to opt out of certain information sharing where applicable. We will also update our privacy policies and notify you of the change.

6. INTERNATIONAL TRANSFERS (FOR INDIVIDUALS IN THE EEA ONLY)

We share your personal data within the SVB Financial Group. This will involve transferring your data outside the European Economic Area (EEA).

Many of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will also involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- For data shared within the SVB Financial Group, we have a global data transfer agreement in place imposing the same data protection safeguards that we deploy inside the EEA.
- Most commonly, we use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Less commonly, for some providers based in the US, we transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the EEA and the US.
- Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. DATA SECURITY

We have put in place appropriate reasonable security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. These may include encryption of data from pages where payments are made or other sensitive

data is transmitted. 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.

Keep in mind, however, that no security or encryption method can ensure complete protection from hackers or human error. 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.

8. DATA RETENTION

How long will we use your personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, compliance, accounting, or reporting requirements.

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 unauthorized 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 requirements.

A summary of retention periods for different aspects of your personal data is available and can be requested from us by contacting us.

In some circumstances you can ask us to delete your data: see Sections 10 and 11 below for further information.

In some circumstances we may anonymize 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.

9. INDIVIDUALS IN THE US - VIEWING AND CHANGING YOUR PERSONAL DATA

You can sign into your SVB online account to see personally identifiable information we have stored, such as your name, email, address or phone number and you can ask the administrator on your SVB online account to edit any information which is inaccurate or incomplete. If you have a right under California or other US State legislation to request access to the personal information we hold about you, you can contact us using the methods listed at the end of this Notice.

10. INDIVIDUALS RESIDENT IN THE EEA OR INDIVIDUALS WITH SVB CAYMAN ISLANDS FUNDS - YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to residents of the EEA and only to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent to our processing of your personal data at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any

processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

DPO

We have appointed a data protection officer (DPO) for Silicon Valley Bank UK and German Branches who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise your legal rights under the General Data Protection Regulation, please contact the DPO using the details set out below. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk) or the relevant German federal data protection regulator. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or German regulator (as relevant) so please contact us in the first instance.

Contact details for the DPO (applicable for individuals in the EEA only):

Full name of legal entity:	Silicon Valley Bank UK Branch
Name or title of DPO:	Emma Hagan, Data Protection Officer dataprotectionofficer@svb.com
Email address:	Data Protection Officer
Postal address:	Silicon Valley Bank Alphabeta 14-18 Finsbury Square London EC2A 1BR
Telephone number:	+44 207 367 7800

11. INDIVIDUALS IN CANADA - YOUR LEGAL RIGHTS

You may withdraw your consent to our processing of your personal data at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain types of processing, we may no longer be able to provide certain of our products or services. You may request access to, or correction of, your personal data in our custody or control, by writing to us as described in Section 14. Your right to access or correct your personal data is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections.

12. YOUR LEGAL RIGHTS (FOR INDIVIDUALS RESIDENT IN CANADA AND THE EEA ONLY)

Under certain circumstances, you have rights under data protection laws in relation to your personal data, depending on where you live.

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, to the extent permitted by law, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or we may 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 may 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.

13. YOUR LEGAL RIGHTS WHERE PERSONAL DATA IS PROCESSED BY A CAYMAN ISLANDS FUND

Where your data is processed in a Cayman Fund, you have the rights set forth in Section 10 above, as well as the rights herein. You have a right to know:

- where the personal data came from;
- the recipients or classes of recipients of the personal data;
- any countries or territories outside the Islands to which the personal data is transferred;
- how the security and integrity of your personal data is maintained.

You have the right to make a complaint to the Cayman Islands Office of the Ombudsman.

14. CONTACT US

If you have any questions, concerns or complaints about our privacy notices, please contact us:

By email: privacyoffice@svb.com

For U.S. Clients, Cayman Funds

Clients and Canada Clients:

By phone:

+1 (800) 774-7390 (U.S.)

By postal mail:

SVB Financial Group
Director, Data Privacy

Security Office
3003 Tasman Drive
Santa Clara, CA 95054

For Clients in the EEA:

By phone:

+44 207 367 7800

By postal mail:

Data Protection Officer
Silicon Valley Bank
Alphabeta
14-18 Finsbury Square
London
EC2A 1BR

15. GLOSSARY

A. LAWFUL BASIS (EEA Only)

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

B. EXTERNAL THIRD PARTIES

Service providers acting as processors including those based in the UK, Europe, Canada, India, Cayman Islands and the US who provide IT and system administration services.

- Professional advisers acting as processors including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Specialist data and research companies.

- HM Revenue & Customs, regulators and other authorities based in the UK, Germany, Canada and the US.
- Market research agencies, public relation agencies, event venues and copy writers who provide marketing services.
- Credit reference agencies and financial crime prevention agencies.

WE UPDATE OUR PRIVACY NOTICES PERIODICALLY

Our Notice may change from time to time. If we make any material changes to our Notice, we will place a prominent notice on our Site. If the change materially affects registered users, we may also send a notice to you by email, push notification or text.