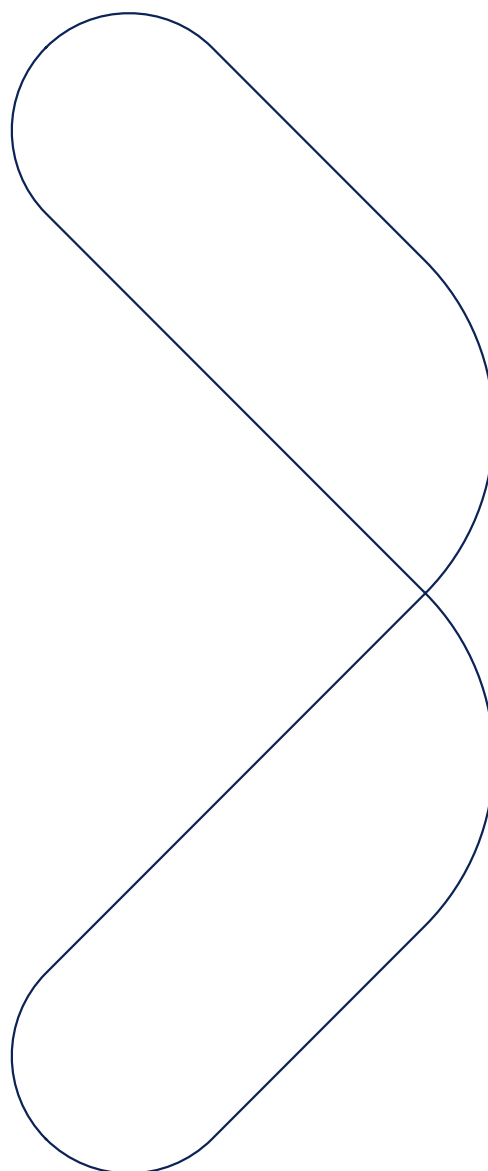
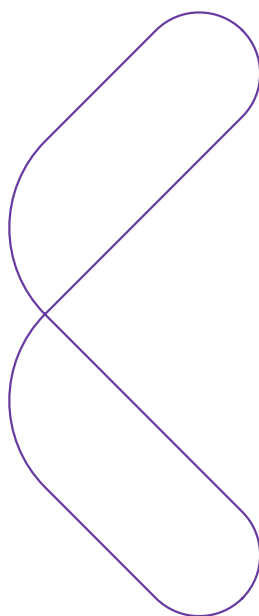

Data Privacy Notice – Sucden Financial Hamburg



Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (GDPR) and the German Federal Data Protection Act (Bundesdatenschutzgesetz - BDSG).

Who are we?

Sucden Financial Hamburg is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes.

How do we process your personal data?

Sucden Financial Hamburg complies with its obligations under the BDSG and EU GDPR by:

- keeping personal data up to date;
- by storing and destroying it securely;
- by not collecting or retaining excessive amounts of data; and
- by protecting personal data from loss, misuse, unauthorised access, and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

Sucden Financial Hamburg does not engage in automated decision making or profiling.

How do we protect your personal data?

Sucden Financial Hamburg takes appropriate technical and organisational measures to protect your personal data from unauthorised access, use, disclosure, alteration, or destruction. These measures include:

- Using encryption, pseudonymization, and anonymization techniques to protect your data.
- Implementing security policies, procedures, and training for our staff and contractors.
- Using secure servers, firewalls, antivirus, and malware protection software.
- Limiting access to your data to those who have a legitimate need to know.
- Requiring our service providers and business partners to adhere to our data protection standards.

Purpose & Legal Basis - for collecting and using personal data.

1. Clients and prospective clients of Sucden Financial Hamburg

The following types of information are usually collected from directors and beneficial owners of our institutional clients:

- proof of identification (for example, copies of passports or identification cards);
- proof of address (for example, copies of bank statements);
- tax information (for example, personal tax identifiers);

(In addition to the above, in the small number of cases where we seek to onboard clients who are individuals we would also collect their bank details, personal e-mail addresses and personal telephone numbers.)

For the following purposes:

- for the purposes of complying with applicable regulations (for example those which aim to prevent money laundering or financial crime);
- for the purposes of administering and operating your account;
- to inform clients and prospective clients (who are natural persons) of news, events, activities, or services running at Sucden Financial; and
- to contact clients and prospective clients (who are natural persons) via surveys to conduct research about their opinions of current services or of potential new services that may be offered.

Sucden Financial Hamburg relies on the following legal grounds for processing your personal data:

- Explicit consent of the data subject:
 - to keep you informed about news, events, activities, and services; and
 - to contact you with surveys about current events;
- processing is necessary for compliance with a legal obligation, particularly: anti-money laundering legislation tax legislation and the second Markets in Financial Instrument Directive / Regulation (“MIFID / R II”) and the European Markets Infrastructure Regulation (“EMIR”); and
- processing is necessary for the establishment, exercise, or defence of legal claims or where courts are acting in their judicial capacity.

Your personal data will be treated as strictly confidential, and will be shared only with:

- other companies in our group;
- those who provide services to us or act as our agents;
- to credit reference agencies or other organisations that help us and others make credit decisions and reduce the incidence of fraud or while carrying out identity, fraud prevention or credit control checks;
- to regulators and governmental agencies, in any jurisdiction, where we are required to do so by applicable laws and regulations;
- there is a public duty to disclose or our interests require disclosure; and
- at your request or with your consent.

In the event of not providing, or objecting to the processing of, personal data:

- If you do not provide consent to us marketing to you, we would not be able to provide you with the latest information about our activities and services.
- We would not be able to open an account for you (or keep an account open) if you refused to provide us with certain personal data (for example proof of identity or tax code) where this is required for us to comply with applicable laws and regulations.

2. Employees and prospective employees of Sucden Financial Hamburg

Types of information held to assess your suitability for employment with Sucden Financial Hamburg are:

- your application form if you were requested to complete one;
- your references;
- your curriculum vitae; and
- any interview notes.

For employees the types of information held (where not obvious):

- date of birth, gender and marital status;
- copy of passport or driving licence;
- your contract of employment;
- correspondence with or about you, for example letters to you about a pay rise, or at your request, a letter to your mortgage company confirming your salary;
- information needed for payroll, benefits and expenses purposes e.g. national insurance number and bank details;
- contact and emergency contact details;
- records of holiday, sickness and other absence;
- CCTV footage and other information obtained through electronic means such as security pass access records;
- photographs;

- records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate disciplinary and grievance records;
- where relevant, you may be mentioned in certain company documents such as the business continuity plan;
- monitoring of employees to prevent and detect crime and misconduct.

We may also collect, store, and use the following “special categories” of more sensitive personal information:

- information about your health, including any medical condition, health, and sickness records; and
- information about criminal convictions and offences.

For the following purposes:

- deciding about recruitment or a new appointment;
- checking that you are legally entitled to work in the EU;
- paying you and calculating tax and national insurance contributions;
- providing benefits to you;
- delivering letters or equipment to your home address;
- liaising with your pension provider;
- business management, planning, accounting and auditing;
- performance reviews;
- education, training and development;
- dealing with legal disputes;
- determining your fitness to work and managing sickness absence;
- complying with health and safety obligations;
- to prevent fraud;
- to monitor our communication systems and ensure compliance with our IT policies; and
- to ensure network and information security;

The situations in which we may process particularly sensitive personal information are listed below:

- we will use information relating to leaves of absence, which may include sickness absence or family related leaves, to comply with employment and other laws;
- we will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and provide appropriate workplace adjustments; and
- we will use information about criminal convictions and offences to assess your fitness and propriety to work in the financial services industry.

Sucden Financial Hamburg relies on the following legal grounds for processing your personal data:

- For prospective employees:
 - processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject. The legitimate interests are as follows:
 - assessing a prospective employee’s candidacy for a position at Sucden Financial Hamburg; and
 - processing is necessary for compliance with a legal obligation, particularly screening prospective employees where this is required by a regulatory authority.
- For employees:
 - processing is necessary for the performance of the contract of employment that is in place with the data subject or to take steps to enter into this contract;
 - processing is necessary for carrying out obligations under employment, social security, or social protection law, or a collective agreement;
 - processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject. The legitimate interests are as follows:

- reviewing the performance of employees;
- paying employees (bank details);
- for the purposes of contacting employees in case of an emergency or a disaster recovery incident; and
- processing is necessary for compliance with a legal obligation, particularly screening employees where this is required by a regulatory authority.

Sucden Financial Hamburg may share your personal data when:

- The following activities are carried out by third-party service providers: payroll, pension administration, benefits provision and administration, IT services, postage, and courier services.
- We may transfer the personal information that we collect about you outside the EEA in order to perform our contract with you. Where we do this, we will ensure that the data receives an adequate level of protection for your personal information. If the country to which we transfer your data is not deemed to have equivalent data privacy laws, then we will use contracts to ensure an adequate level of protection is given to your data.

In the event of not providing, or objecting to the processing of, personal data:

- We would not be able to assess your candidacy for a role at Sucden Financial Hamburg.
- We would not be able to perform our obligations that exist in the contract of employment that is in place between us. For example, if you objected to us holding your bank details then we would not be able to pay you.
- We may not be able to comply with our legal or regulatory obligations which may make it difficult for us to continue to employ you in a particular role. For example, if you are employed in a position that requires regulatory approval and you objected to us conducting screening searches using personal data that you had previously provided, we may not be able to obtain (or maintain) your approval

The use of CCTV on Sucden Financial Hamburg's premises:

Processing is necessary for the legitimate interests of the data controller or a third party, except where such interests are overridden by the interests, rights, or freedoms of the data subject. The legitimate interests are as follows:

- for the prevention of crime and to ensure the safety of everyone on our premises.
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How long do we keep your personal data?

We keep your personal data for no longer than reasonably necessary for a period of no longer than seven years (or, if possible, for shorter) in order to:

- meet applicable legal and regulatory requirements;
- exercise or defend legal claims; or
- in the case that we use your personal data for marketing purposes, until you have withdrawn your consent for us to process your personal data for these purposes.

Your rights and your personal data

Unless subject to an exemption under the EU GDPR, you have the following rights with respect to your personal data:

- the right to request a copy of your personal data which Sucden Financial Hamburg holds about you;
- the right to request that Sucden Financial- Hamburg corrects any personal data if it is found to be inaccurate or out of date;

- the right to request your personal data is erased where it is no longer necessary for Sucden Financial Hamburg to retain such data;
- the right to withdraw your consent to the processing at any time (note: this right would only be available if Sucden Financial Hamburg is relying upon consent as a processing condition);
- the right to request that the data controller provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability) (note: this right would only be available if the processing is based on consent or is necessary for the performance of a contract with the data subject and in either case the data controller processes the data by automated means. Sucden Financial does not process data by automated means, see below);
- the right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- the right to object to the processing of personal data (note: this would only apply where Sucden Financial Hamburg is processing based on legitimate interests or to conduct direct marketing); and
- the right to lodge a complaint with the Bundesbeauftragte für den Datenschutz und die Informationsfreiheit (BfDI).

Transfer of Data Abroad

In limited and necessary circumstances, your information may be transferred outside of the European Economic Area (“EEA”) to comply with our legal or contractual requirements or because one of our service providers is based outside the EEA. In some cases, these countries may not have the same level of data protection as the EEA, and as so, Sucden Financial Hamburg will ensure that appropriate safeguards are in place to protect your personal data, such as:

- The country has been deemed to provide an adequate level of protection by the European Commission.
- Sucden Financial Hamburg has entered standard contractual clauses approved by the European Commission with the recipient of your personal data.

Automated Decision Making

Sucden Financial Hamburg does not use any personal data that it obtains for the purposes of making automated decisions.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Privacy Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

Publication

This Notice will be reviewed as is necessary so that the published document is accurate.

This document was published with an effective date of 1 January 2025.

Contact Details

To exercise all relevant rights, queries, or complaints please in the first instance contact the Data Protection Officer on: +44(0) 20 3207 5000 (Mon-Fri 8am-5pm) or at: Data Protection Officer, Sucden Financial Limited, 60 Great Tower Street, London, United Kingdom, EC3R 5AZ or via email on: dataprotectionofficer@sucfin.com

You can contact the Federal Commissioner for Data Protection and Freedom of Information (BfDI) in Germany - Address: Der Bundesbeauftragte für den Datenschutz und die Informationsfreiheit, Graurheindorfer Straße 153, 53117 Bonn, Germany. Phone: +49 228 997799-0. Email: poststelle@bfdi.bund.de. Website: www.bfdi.bund.de.

These details should help you get in touch with the BfDI for any inquiries or assistance related to data protection and freedom of information in Germany.
