

PRIVACY NOTICE

Oppenheimer Europe Ltd. (“OPEU”) is committed to protecting personal data. To the extent that the European General Data Protection Regulations (“GDPR”) applies, this privacy notice will inform you as to how we look after personal data and it will tell you about your privacy rights and how the law protects you.

This privacy notice aims to give you information on how OPEU collects and processes your personal data including any data you may provide when for example you want to transact business with us.

OPEU is the controller and is responsible for your personal data. We have appointed a Privacy Manager who is responsible for overseeing questions in relation to this privacy notice.

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).

In order to provide you with our products, services and any other business related activities we may collect, use, store and transfer personal data about you. This data may include the following:

- Identity Data (eg, name, passport number, nationality, date of birth, gender);
- Contact Data (eg, postal address, email address, telephone number);
- Usage Data (eg, information about how you use our products and services, interactions, calls, meetings, emails); and
- Transaction Data (eg, information about the trading you have undertaken)

We do not collect any special categories of personal data about you (this includes details about your race or ethnicity, health, political opinions, religious or philosophical beliefs, sexual orientation or data relating to criminal convictions or offences) unless it is required through a legal obligation.

Where we need to collect personal data by law or under the terms of a contract we have with you 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 you (for example to provide you with goods or services).

HOW IS YOUR PERSONAL DATA COLLECTED?

The data may be provided by you directly or may be obtained by us from third parties or other public sources including where we may need to verify identity. We may also collect your data where you attend an OPEU event, where your employer provides us with information about you, where your contact details are provided by one of our other clients or where you may be a prospective or existing client.

HOW WE USE YOUR PERSONAL DATA AND THE PURPOSE

We will only use your personal data when the law allows us to. Most commonly, we will use it in the following circumstances:

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

Generally, we do not rely on consent as a legal basis for processing your personal data.

As mentioned above we will only process your personal data based on a 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. Some examples of our purposes are:

- To be able to enter into transactions with you for our products and services;
- the lawful basis will include performance of the contract, and necessary to comply with a legal obligation.
- To be able to telephone you or market our product and services to you: the lawful basis will include performance of the contract if you are an existing client, and/or necessary for our legitimate interests to grow our business if you are a prospective client.
- To be able to enter into agreements with you as a vendor or supplier: the lawful basis will include performance of the contract, necessary to comply with a legal obligation and/or necessary for our legitimate interests to grow our business.

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 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.

DISCLOSURES OF YOUR PERSONAL DATA

In order to fulfill the above mentioned purposes we may have to share your personal data with internal or external third parties. Internal parties will include our affiliate companies and/or companies within the Oppenheimer Group such as Oppenheimer & Co Inc. External parties will include companies that perform certain activities for and on our behalf so that we can perform the contract and/or activity with you, including but not limited to; service providers, professional advisers, HM Revenue and Customs, regulators, fraud prevention agencies. We require 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 parties to use your personal data for their own purposes and we only permit them to process your personal data for the specified purposes and in accordance with the law and where applicable our instructions.

INTERNATIONAL TRANSFERS

We may share your personal data within the Oppenheimer Group and with other external third parties as mentioned above. This will involve transferring your data outside the European Economic Area (“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:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers we may use specific contracts approved by the European Commission; and
- Where we use providers based in the US we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the US.

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.

DATA RETENTION – HOW LONG WILL YOU USE MY PERSONAL DATA FOR ?

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

By law we have to keep information about our clients, service providers and other relevant entities for 7 years after the end of the contractual and/or business relationship. The number of years may also be amended from time to time depending on what the law states.

YOUR LEGAL RIGHTS

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

- Request access to your personal data. You can obtain information relating to the processing of your personal data and a copy of such data.
- Request correction of your personal data. Where you consider that your personal data is inaccurate or incomplete you can require such personal data to be modified accordingly.
- Request to erasure of your personal data. You can require the deletion of your personal data to the extent permitted by law.

- Object to processing of your personal data. You can object to the processing of your personal data on grounds relating to your particular circumstance. You have the absolute right to object to processing of your personal data for direct marketing purposes.
- Request to restriction of processing your personal data. You can request the restriction of the processing of your personal data.
- Request transfer of your personal data. Where legally applicable you have the right to have the personal data you have provided to us to be returned to you or where possible to be transferred to a third party; and
- Right to withdraw consent. Where you have given consent for the processing of your personal data you have the right to withdraw your consent at any time.

Should you wish to assert any of the rights set out above please contact the Privacy Manager at the address as noted in this notice.

You will not have to pay a fee to access your personal data (or to exercise any of the rights). However we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

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 rights). This is a security measure to ensure that your 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 the response.

If you have any questions about this privacy notice, including any requests to exercise your legal rights please contact the Privacy Manager using the details set out below.

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