

PRIVACY NOTICE

1. INTRODUCTION

Novum Securities Limited (“NSL”, “we”, “our” and “us”) is committed to protecting the privacy and security of the Personal Data that we hold.

This notice is intended to explain how we collect, use and protect your Personal Data.

We do not knowingly collect Personal Data from children under the age of 16 years old. If you are under the age of 16, please do not use our website or provide us with any personal information.

2. WHO WE ARE

We are a UK based stock broker established to service corporate and professional clients. Our objective is to provide capital to listed growth companies and investment opportunities to our professional client base.

We are a data controller and are therefore we are responsible for and control the processing of your Personal Data”. We are committed to handling Personal Data fairly and lawfully and take our data protection obligations very seriously. We ensure that we process Personal Data in compliance with applicable data protection laws, including without limitation, the General Data Protection Regulation 2016/679 (“GDPR”) and the Data Protection Act 2018 (“Act”).

3. WHAT IS PERSONAL DATA AND WHAT DATA DOES NSL HOLD?

“Personal Data” means any information relating to an identified or identifiable natural (living) person. The information we collect and hold can be categorised as follows:

Visitors to our website (novumsecurities.com) – when you visit our website or make an enquiry we collect some basic information such as your name, contact details, IP address and internet service provider’s domain name, which pages you accessed on our site and when.

Clients and Prospective Clients– in relation to our individual clients, includes name, contact details (email, telephone number address), identification information (NI number, passport number driver’s license), bank account details, background checks (credit safe), transaction histories etc. For our corporate clients, includes the names, and contact details of the individuals we interact with together with background and identification information (as listed above) of Directors and Officers that we are required to collect for regulatory purposes. For our prospective clients, primarily includes names and contact details but if being on-boarded could also include other information as described above

Service Providers, Suppliers and Contractors – the names and business contact details of the individuals we interact with at our service providers, suppliers and contractors together with background and identification information that we are required to collect.

Other Business Partners / Contacts (e.g. banks, brokers, registrars, lawyers, accountants, actuaries, regulators, HMRC, investee companies, managing agents etc) – the names and business contact details of the individuals we interact with at these entities together with background and identification information that we are required to collect.

4. HOW IS PERSONAL DATA COLLECTED?

We collect your Personal Data from you and third-party sources including:

- Suppliers, contractors and other business contacts; and
- Third parties and publicly available sources e.g. Companies House, Registrars and background check providers (creditsafe).

5. HOW DO WE USE PERSONAL DATA?

In accordance with the GDPR/Act, we may only process your Personal Data if we have a “legal basis” (i.e. a legally permitted reason for doing so). For the purposes of this policy, our legal basis for processing your personal data is set out in the table below:

Why we will process your Personal Data	The legal basis for which is...
To operate, administer, maintain and improve our website and the services available through it.	This processing is necessary for the legitimate interests we pursue in improving our website, subject to you raising an objection, requiring us to check that our interest is not overridden by any risk to your rights and freedoms.
To investigate and respond to any enquiries through our website.	<p>This processing is necessary for the legitimate interests we pursue in responding to enquiries, subject to you raising an objection, requiring us to check that our interest is not overridden by any risk to your rights and freedoms.</p> <p>Where an enquiry relates to and/ or leads to a contract between you and us processing may be necessary for the performance of a contract.</p>
To provide stock broking and administration services to our clients	This processing is necessary for the performance of a contract between us and Personal Data is processed to enable us to provide services to you.
To advance or defend any claim arising out of our services or contract with you.	This processing is necessary for the legitimate interest we pursue in advancing or defending a claim, including obtaining payment for any services we have provided and defending any allegations against us, subject to you raising an objection, requiring us to check that our interest is not overridden by any risk to your rights.
To fulfil our contractual and other obligations to you (being our suppliers, contractors and other business partners).	This processing is necessary for the performance of a contract between us and Personal Data is processed to enable us to provide services to you.

<p>To comply with our legal obligations, including identity and other verification checks in relation to Anti-Money Laundering and Counter-Terrorist Finance regulations.</p>	<p>This processing is necessary to comply with our relevant legal obligations.</p>
<p>To contact you for marketing purposes. (See marketing section below for further details)</p>	<p>This processing is necessary for the legitimate interest we pursue in marketing products and services to you, subject to you raising an objection requiring us to check that our interest is not over ridden by any risk to your rights.</p>

We may combine the Personal Data that we collect from Data Subjects with information obtained from other sources to the extent permitted by law.

It is important that the Personal Data we hold is accurate and current and therefore the Data Subject should advise us as soon as possible in the event of any changes.

6. TO WHOM DO WE DISCLOSE PERSONAL DATA?

We will only use a Data Subject's Personal Data for our internal business purposes. This includes the provision of marketing related correspondence to the Data Subject on our products and services.

We do not sell any Personal Data to third parties and we do not share Personal Data with third parties for the third parties' marketing purposes. However, we may need to disclose Data strictly on a need to know basis to:

- our service providers (including Pershing Securities Limited), contractors and suppliers to enable them to undertake services for us and we will ensure they have appropriate measures in place to protect your information;
- with other parties such as banks, brokers, registrars, lawyers, accountants, actuaries, regulators and HMRC where we are obliged, or permitted, to do so by applicable law, regulation or legal process; and
- to any prospective buyer or seller (and their representative) in the event that we sell or buy a business or asset.

7. WHAT DO WE DO TO KEEP PERSONAL DATA SECURE?

We have put in place appropriate physical and technical measures to safeguard the Personal Data we collect in connection with our services. In addition, we limit access to Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process Personal Data on our instructions and are subject to a duty of confidentiality.

However, please note that although we take appropriate steps to protect Personal Data no device, computer system, transmission of data or wireless connection is completely secure and therefore we cannot guarantee the absolute security of Personal Data.

8. INTERNATIONAL TRANSFER OF DATA

The Personal Data that we collect may be stored and processed in the European Economic Area ("EEA") or transferred to, stored at or otherwise processed outside the EEA.

Where Personal Data is transferred outside the EEA we will take all steps reasonably necessary to ensure that the Data is kept secure and treated in accordance with this Data Protection Notice and the requirements of applicable law wherever the data is located. Appropriate transfer agreements and mechanisms (such as the EU Model Clauses) will be put in place to help ensure that our third-party service providers provide an adequate level of protection for Personal Data.

9. DATA RETENTION – HOW LONG IS PERSONAL DATA STORED / KEPT?

We retain Personal Data for as long as necessary to fulfil the purposes for which the Data has been collected as outlined in this Data Protection Notice unless a longer retention period is required by law. As a guide we will retain data for 7 years following termination of a contract for services between us.

Data is kept under regular review to ensure that it is not held longer than is strictly necessary, whilst taking account of our other regulatory obligations such as the requirement to retain evidence of anti-money laundering checks.

When Personal Data is no longer required for the purpose it was collected or as required by applicable law, it will be deleted or in certain circumstances returned to the Data Subject in accordance with applicable law.

10. ACCESSING PERSONAL DATA AND OTHER RIGHTS THAT A DATA SUBJECT HAS

We will collect, store and process Personal Data in accordance with the Data Subject's rights under the GDPR.

Under certain circumstances the Data Subject has the following rights in relation to their Personal Data:

- a) the right to request details of their Personal Data held by us and to request copies of such information;
- b) the right in certain circumstances to request us to port (i.e. transmit) your Personal Data direct to another organisation;
- c) the right to request that we rectify or update any Personal Data that is incorrect or incomplete;
- d) the right to have Personal Data erased in certain specified circumstances (i.e. where it is no longer necessary for the purposes set out above);
- e) the right to restrict our processing of your Personal Data, in certain circumstances; and
- f) the right to object to specific types of processing of Personal Data, for example where it is being used for the purpose of direct marketing.

11. HOW CAN A DATA SUBJECT ENFORCE THEIR RIGHTS?

In the event of a Data Subject wishing to enforce any of their rights under the GDPR/ Act then please contact using the details below. A response to the request will be made without undue delay and no later than one month from receipt of such a request. We will not charge a fee for processing such a request.

If a Data Subject is concerned that we have not complied with their legal rights under the GDPR/Act, they may contact the Information Commissioner's Office (www.ico.gov.uk) which is the data protection regulator in the UK. Non-UK Data Subject's may contact their local data protection supervisory authority.

12. THIRD-PARTY LINKS AND PRODUCTS ON OUR SERVICES

Our websites, applications and products may contain links to other third-party websites that are not operated by us, and our website may contain applications that can be download from third parties. These linked sites and applications are not under our control and as such, we are not responsible for the privacy practices or the content of any linked websites and online applications. If a user chooses to access any third-party websites or applications, any Personal Data collected by the third party's website or application will be controlled by the Data Protection Notice of that third party. We strongly recommend that you take the time to review the privacy policies of any third parties to which you provide Personal Data.

13. COOKIES

What are cookies?

We [as well as certain other third parties that provide content, advertising, or other functionality on our Services] may use cookies and other technologies, including web beacons, action tags, pixel tags, in certain areas of our services.

Cookies are small text files that can be read by a web server in the domain that put the cookie on your hard drive. Cookies are assigned to and stored in a user's internet browser on a temporary (for the duration of the online session only) or persistent basis (cookie stays on the computer after the internet browser or device has been closed). Cookies collect and store information about a user's preferences, product usage, content viewed, and registration information which allows for NSL to provide users an enhanced and customised experience when engaging with our products.

We may use cookies to store your preferences and settings, help you with signing in, provide targeted ads, and analyse site operations.

For further information on what cookies are, how we and other third parties use them, and for details of how cookies can be disabled, please see our Cookie Policy or visit www.allaboutcookies.org.

13. Marketing and opting out

For the purposes of the GDPR and the Act we have a legitimate interest in processing your personal data (name and contact details) for marketing communications.

For marketing communications that are business to business we do not require your permission. In certain circumstances, where a marketing communication is aimed at you as an individual, we may require your permission as set out below.

Where you (as an individual) have previously ordered products or services from us, unless you have told us not to, we may contact you by telephone, email or post about other products, services, promotions and special offers that may be of interest to you.

In addition, with your permission, we may contact you by telephone, email or post to provide information in relation to other products, services, promotions, special offers and other information we think may be of interest to you.

Further, with your permission, we may share your details with carefully selected third parties and they may contact you directly (unless you ask them not to) by telephone, email or post about products, services, promotions and special offers that may be of interest to you.

You have the right at any time to ask us, [or any third party], to stop processing your information for direct marketing purposes. If you wish to exercise this right please follow the unsubscribe link on the communications or contact us on the below details, or the relevant third party, giving us or them enough information to identify you and process your request.

14. CHANGES TO THIS DATA PROTECTION NOTICE

We will update this Data Protection Notice from time to time and hence it is important to check the “Date Notice Last Updated” legend at the bottom of this Notice. Any changes will become effective upon our posting of the revised Data Protection Notice.

We will provide notice to Data Subjects where any of the changes are material and, where required by applicable law, we will obtain your consent. We will provide this notice by e-mail or by posting notice of the changes on our website.

15. CONTACT Us / FURTHER INFORMATION

If you have any questions concerning the content of this Data Protection Notice, including any requests to exercise your legal rights, the relevant contact details are set out below.

Contact details

Name of Contact: Charles Brook-Partridge

Position: Chief Executive Officer

Email address: cbrook-partridge@novumsecurities.com

Postal address: 8-10 Grosvenor Gardens, Belgravia, London, SW1W 0DH

Date Notice Last Updated – 26th May 2018