

## EEA/UK PRIVACY POLICY

Last Updated: February 28, 2022

King Street (Europe) LLP (“**King Street**”) is a limited liability partnership registered in England and Wales (registered number OC313070) with its registered office at 50 Berkeley Street, London, W1J 8HA. The purpose of this EEA/UK Privacy Policy is to inform individuals located in the European Economic Area (“**EEA**”), the United Kingdom (“**UK**”) and Switzerland (“**you**” or “**your**”) about the collection, use and disclosure of your personal data when you visit King Street and its affiliates’ (“**we**”, “**our**”, or “**us**”) websites, including <https://www.kingstreet.com/home> (“**Site**”), or otherwise interact with us. King Street is the controller of your personal data (i.e., any information that identifies, directly or indirectly, an individual) (“**Personal Data**”). We are responsible for ensuring that we use that Personal Data in compliance with applicable data protection laws.

We respect your privacy and are committed to keeping your Personal Data secure. This EEA/UK Privacy Policy governs the handling of Personal Data by us in the course of carrying on commercial activities. Please read this EEA/UK Privacy Policy in conjunction with the Site’s Terms and Conditions.

### **The Types of Information We May Collect About You**

When you visit and browse the Site, or otherwise interact with King Street, we may collect three different types of information about you: information you provide to us, information that we collect about you and information we obtain from other sources.

### **Information You Provide To Us**

To receive our services or login to your account with us, you may have to provide Personal Data, including but not limited to:

- **Contact Data** including your name, e-mail address, address, country of residence, phone number, and facsimile number.
- **Background Data** including company and job title, previous employment, education history and other information you voluntarily disclose to us.

- **IT Data** including browser type, language type, device type, operating system, IT address or click stream data, access times, domain name and the address of the site from which you came to the Site.

Where we need to collect the abovementioned categories of Personal Data by virtue of a legal obligation or in light of a contract entered or to be entered into with you, and you do not provide this Personal Data when requested, we may not be able to comply with our legal obligations, provide you with a service or perform the contract we have or are trying to enter into with you. In such case, we may have to terminate our relationship with you.

### **Information We Obtain From Other Sources**

We may obtain information from your agents and advisers and from third parties and public sources we use to verify your identity or to confirm your eligibility to use our services, in accordance with our legal or regulatory obligations.

We automatically collect basic technical information from all visitors to the Site through our automatic data collection tools, which may include cookies and other commonly used technologies (see section on Cookies below). These tools collect IT Data (please refer above) which, among other things, helps us improve the functionality of the Site.

### **Cookies**

As mentioned above, this Site may use “cookies” (small text files stored on your computer’s hard drive by websites that you visit). We use cookies to check the status of a logged session (i.e., to keep users logged in from page to page). These cookies: (i) may let us know who you are; (ii) are necessary to access your account information (stored on our computers) in order to personalize services; and (iii) will provide us and our marketing service providers with information to personalise content, including advertisements and promotional materials for you.

To find out more about cookies, including how to see what cookies have been set and how to manage and delete them, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). This website will also explain how you can delete cookies which are already stored on your device. However, without certain cookies, you may not have access to many features that may make your browsing of our Site smoother, and some of our services may not function properly.

In addition to the categories of Personal Data described above, King Street will also process further anonymized information and data that is not processed by reference to a specific individual.

### How We May Use Personal Data

We may use and store your Personal Data in the following ways and for the following purposes:

Categories of Personal Data	Purpose	Lawful Basis
Contact Data	To contact you and to respond to your requests and enquiries when you contact us	We have a legitimate interest to respond to your requests and enquiries for ongoing business administration
Contact Data	For the management and administration of our business	We have a legitimate interest to properly manage and administer our business and our relationship with you and to ensure that we are effective and efficient
Contact Data, IT Data	For ongoing review and improvement of the information provided on the Site to ensure it meets the needs of users, and to conduct analysis required to detect malicious data and to prevent any potential disruptions or cyber attacks	We have a legitimate interest to properly manage and administer our business, to monitor the use of our copyrighted materials and to maintain compliance with our internal policies and procedures
Contact Data, IT Data	To personalize your visit to the Site and to assist you whilst you use the Site	We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient
	To improve the operation of the Site by understanding who uses the Site	
	For business administration, including statistical analysis	
Contact Data, IT Data	To allow you to use and access King Street's services and to understand feedback relating to King Street's services as a user of the Site or as a business contact	We have a legitimate interest to manage and administer the operation of our business effectively and efficiently  To manage and perform our contract with you

Categories of Personal Data	Purpose	Lawful Basis
Contact Data, IT Data	To communicate with you as a user of the Site or as a business contact in order to provide you with services	<p>We have a legitimate interest to manage and administer the operation of our business effectively and efficiently</p> <p>To manage and perform our contract with you.</p>
Contact Data, Background Data	Where you apply for a position with us, to review and process your application	We have a legitimate interest to consider an applicant for a role of vacancy in accordance with our recruitment process
Contact Data, IT Data	To enforce or defend our rights, ourselves, or through third parties to whom we delegate such responsibilities.	<p>We have a legitimate interest to properly manage and administer our relationship with you and to ensure that we are effective and efficient as we can be</p> <p>To manage and perform our contract with you.</p>
Contact Data, IT Data	To contact you to tell you about products and services offered by us as well as other promotions which we believe may interest you unless you advise us that you do not wish to receive marketing or market research communications from us	<p>If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.</p> <p>If you wish to stop receiving marketing or market research communications from us, you can unsubscribe via the link at the bottom of the relevant marketing email or contact us using the contact details below.</p> <p>We have a legitimate interest to carry out direct marketing.</p>
Contact Data, IT Data	To monitor electronic communications for investigation and for fraud prevention purposes and crime detection and prevention and investigation	<p>To comply with our legal or regulatory obligations</p> <p>We have a legitimate interest to manage our business including for legal, personnel,</p>

Categories of Personal Data	Purpose	Lawful Basis
	To comply with any of our applicable legal or regulatory obligations. For example, if you are a business customer, we need to process your information to verify your identity and undertake necessary due diligence checks	administrative and management purposes and for the prevention and detection of crime provided our interests are not overridden by your interests.
	To investigate and resolve complaints and manage regulatory matters, investigations and litigation	
	To share data with policy, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation, including screening transactions, reporting suspicious activity and complying with production or court orders	

**You have a right to object to the processing of your Personal Data where that processing is carried out for our legitimate interest.**

**Disclosure of Your Personal Data to Third Parties**

We may share your Personal Data with our affiliates for the management and administration of our business, including to provide technical support for the Site. The services these third parties provide may include email administrative functions, marketing and conducting marketing research, and providing customer service.

We may share your Personal Data with third party contractors and suppliers in connection with the processing of Personal Data for the purposes described in this EEA/UK Privacy Policy to enable these contractors to provide services to us. We may also disclose your Personal Data to third parties if we or an affiliate is required to do so in order to: (i) comply with any legal or regulatory obligation; (ii) establish, exercise or defend our legal rights; (iii) detect and protect against fraud or any technical or security vulnerabilities; (iv) facilitate any merger, acquisition

or sale of company assets; or (vii) to protect the rights, property, or safety or security of our business, third parties, or of others.

### **Transfers of Personal Data Outside the EEA, the UK and Switzerland**

The Personal Data that we collect from you, including via the Site, may be transferred to, and stored at, a destination outside the EEA, the UK or Switzerland (e.g., the U.S.), which do not provide a similar or adequate level of protection to that provided by countries in the EEA, the UK or Switzerland. It may also be processed by staff operating outside the EEA or the UK who work for our affiliates or for one of our third-party contractors or suppliers.

Where we transfer your Personal Data outside the EEA, the UK or Switzerland, we will ensure that such Personal Data is transferred in accordance with applicable data protection laws.

### **Retention of Personal Data**

How long we hold your Personal Data for will vary. The retention period will be determined by the following criteria:

- the purpose for which we are using your Personal Data to provide our services to you – we will need to keep the data for as long as is necessary for that purpose;
- the type of Personal Data collected; and
- whether we are subject to a legal, contractual, regulatory or similar obligation to retain data – (e.g., laws or regulation may set a minimum period for which we have to keep your Personal Data, or government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

### **Your Rights**

Where you are located in the EEA, the UK or Switzerland, you may have a number of legal rights in relation to the Personal Data that we hold about you, which may be subject to limitations and/or restrictions. These rights include:

- the right to obtain information regarding the processing of your Personal Data and access to the Personal Data which we hold about you;
- the right to withdraw your consent to our processing of your Personal Data at any time\*;

- the right to receive any Personal Data which we process about you in a structured, commonly used and machine-readable format (i.e., the portability of your Personal Data);
- the right to request that we rectify your Personal Data if it is inaccurate, out-of-date or incomplete;
- the right to request that we erase your Personal Data in certain circumstances\*;
- the right to request that we restrict our processing of your Personal Data in certain circumstances; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below).

We will respond to your request in writing or orally if requested, as soon as practicable and in any event not more than within one month after receipt of your request. In exceptional cases, we may extend this period by two months and provide you with reasons. We may request proof of identification to verify your request.

You can exercise your rights by contacting us using the details set out in the “Questions or Comments or Contact Us” section below.

\*Please note that we may be entitled to continue processing your Personal Data if there is a legal ground for doing so.

### **Protection of Personal Data; No Guarantee of Security**

We endeavour to protect your Personal Data. We use both technical and organisational methods to maintain the integrity and security of our databases, including firewalls. While we strive to protect your Personal Data, we cannot guarantee or warrant its complete security. No data transmission over the internet can be guaranteed to be 100% secure. You should always use caution when transmitting Personal Data over the Internet. Please note that the Site may contain links to third party websites. Please be aware that we are not responsible for the privacy practices of other websites.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Site, you are

responsible for keeping this password confidential. We ask you not to share your password with anyone

### **Changes to this EEA/UK Privacy Policy**

We may revise this EEA/UK Privacy Policy from time to time. If we decide to change our EEA/UK Privacy Policy, we will post the revised policy on this webpage. You should check our Site frequently to view the most up-to-date version of this EEA/UK Privacy Policy.

### **Questions or Comments or to Contact Us**

The UK's Information Commissioner's Office ("ICO") regulates data protection and privacy matters in the UK. You can find out more information about your rights by contacting the ICO, or by searching the ICO website located at [www.ico.org.uk](http://www.ico.org.uk). If you are in the EEA or Switzerland, please contact your local data protection authority.

If you have any questions, comments, or concerns about our privacy practices, or if you wish to exercise any of your rights, please contact us at: [InvestorReports@kingstreet.com](mailto:InvestorReports@kingstreet.com).