

PrimaryBid

Privacy notice for notifications service subscribers and former transactional account customers

Effective 17 April 2024

PrimaryBid Limited (CRN: 08092575) ("**PrimaryBid**", "**we**", "**our**" or "**us**") respects the privacy of the individuals whose personal data we collect ("**you**" or "**your**").

This privacy notice (the "**Privacy Notice**") provides information, for the purposes of the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, as amended and incorporated into the domestic law of the United Kingdom by virtue of the European Union (Withdrawal) Act 2018 ("**UK GDPR**"), the UK Data Protection Act 2018 ("**DPA**") and other applicable national data protection laws, concerning how PrimaryBid processes and protects your personal data that we may receive as part of your registering and interactions with PrimaryBid.

The terms "**controller**", "**processor**", "**data subject**", "**personal data**", "**process**", "**processes**", and "**processing**" used in this Privacy Notice have the meanings given to them in the UK GDPR.

Controllershship

PrimaryBid is an independent 'controller' in respect of its processing of your personal data. We are responsible for ensuring that we hold and use your personal data in compliance with the UK GDPR and the DPA and other applicable national data protection laws.

The personal data that we collect about you

If you are a PrimaryBid notifications service subscriber:

We collect a certain amount of personal data about you, which may include your name, email address, age, nationality, broker name and any other personal data that you provide to us in the subscription form.

If you are a former transactional account customer of PrimaryBid:

In accordance with our regulatory obligations, we must retain a certain amount of personal data about you for a period of five years from the date on which your account was closed. We may have obtained this personal data either directly from you or from a third party (for example

from your broker or an identity checking service) and it may include your name, date of birth, nationality, gender, email address, telephone number, residential address, proof of residential address, National Insurance number, identity-related information (such as copies of your passport, driving licence, or birth certificate), adverse media data, sanctions data, bank account details, company shareholding information and your broker information (including your broker account number).

We will not process any special category data unless we are required to do so in order to comply with our legal and regulatory obligations.

For more information on our use of cookies and similar technologies, please refer to our cookie policy [here](#).

The purposes for processing your personal data

If you are a PrimaryBid notifications service subscriber we may process your personal data to:

- communicate with you as necessary in order to deliver the notifications service to you;
- respond to your enquiries, including responding to complaints and attempting to resolve them;
- communicate with you about our services and any changes to our service (for example, if we were to change this Privacy Notice or our Terms and Conditions);
- anonymise or pseudonymise your personal data where it is necessary or prudent for us to do so;
- administer and protect our business (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data);
- manage risk for us and our customers;
- comply with our internal policies and procedures;
- develop, manage and improve our products and services (including conducting research and analysis) and to test new products and services;
- run our business in an efficient and proper way, including in respect of our financial position, business capability, corporate governance, audit, strategic planning and communications;
- monitor and/or record your communications with us for quality control, training, security and regulatory purposes;
- exercise our rights in agreements and contracts to which we are a party;
- comply with our legal and regulatory obligations; and
- produce management information about or in connection with PrimaryBid offers.

If you are a former transactional account customer of PrimaryBid we may process your personal data to:

- comply with our legal and regulatory obligations; and
- exercise our legal rights.

What is the legal basis of the processing?

When we process your personal data, we may rely on:

If you are a PrimaryBid notifications service subscriber:

- Article 6(1)(b) UK GDPR to the extent such processing is necessary for the performance of the PrimaryBid notifications service contract to which you are a party or in order to take steps at your request prior to entering into any such contract.
- Article 6(1)(f) UK GDPR to the extent such processing is necessary for the purposes of the legitimate interests we pursue to the extent we have concluded that our processing is not overridden by your interests or fundamental rights or freedoms that require the protection of personal data. Examples of this might include customer analysis and processing for the purposes of compliance with our internal policies and procedures.
- Article 6(1)(c) UK GDPR to the extent processing is necessary for compliance with a legal obligation to which PrimaryBid is subject.
- Article 4(11) and Article 7 UK GDPR where we have obtained your consent to the relevant processing activity.

If you are a former transactional account customer of PrimaryBid:

- Article 6(1)(c) UK GDPR to the extent processing is necessary for compliance with a legal obligation to which PrimaryBid is subject.

Who will your personal data be shared with? / Who are the recipients of your personal data?

If you are a PrimaryBid notifications service subscriber:

We may share your personal data with any third parties that help us provide services, with legal or other professional advisors and with regulators, prosecutors and law enforcement authorities or as otherwise required by applicable law or regulation. We may also share your personal data with our affiliates in order to provide these services.

Any such transfers will be in compliance with our obligations as a controller under the UK GDPR, the DPA and other applicable national data protection laws. Some of these persons may process your personal data in accordance with our instructions and others will themselves be responsible for their use of your personal data.

The disclosures described in this Privacy Notice may involve transferring your personal data to countries outside the UK and EEA which may not have similarly strict data privacy laws. When this occurs, we will ensure that any such transfers are carried out in compliance with applicable law, including, where necessary, being governed by data transfer agreements designed to ensure that your personal data is protected, on terms approved for this purpose by the UK or EU.

We may provide anonymised aggregated datasets, or insights derived from those anonymised aggregated datasets to third parties for commercial purposes. In all cases, PrimaryBid will ensure that your personal data is only used or disclosed for the purposes set out above and in compliance with applicable data protection laws.

If we are involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal data and give you notice before your personal data is transferred or becomes subject to a different privacy notice.

If you are a former transactional account customer of PrimaryBid:

We will only share your personal data with a third party if required for data storage purposes or if required by applicable law or regulation.

The disclosures described in this Privacy Notice may involve transferring your personal data to countries outside the UK and EEA which may not have similarly strict data privacy laws. When this occurs, we will ensure that any such transfers are carried out in compliance with applicable law, including, where necessary, being governed by data transfer agreements designed to ensure that your personal data is protected, on terms approved for this purpose by the UK or EU.

If we are involved in a merger, acquisition, or sale of assets, we'll continue to ensure the confidentiality of your personal data.

Opting-out

If you are a PrimaryBid notifications service subscriber, you can unsubscribe from notifications at any time by clicking on the unsubscribe link contained within each of the relevant communications. We will endeavour to give effect to your opt-out as soon as possible but please note that it can sometimes take up to 7 days for a change to become effective and you may still receive notifications in the interim period.

Retention and deletion of your personal data

We intend to keep your personal data accurate and up to date and, as a general principle,

we do not retain your personal data for longer than we need it. We will delete or anonymise any information that we hold about you when it is no longer required for the purposes set out above, or where longer, such period as is required or permitted by law or regulatory obligations which apply to us.

If you are a former transactional account customer, please note that we are subject to regulatory obligations that require us to retain certain account data for a period of five years from the date on which your account was closed. Further information about our personal data retention policy is available on request (see the "Contacting Us" section below).

Automated decision-making techniques (including profiling)

Your personal data will not undergo any automated decision making.

Your rights in relation to your personal data

The UK GDPR and other applicable laws provide you (as the data subject) a number of absolute or qualified legal rights in relation to the processing of your personal data. These rights include:

- the right to know what personal data we process and a right of access to such personal data;
- the right to request any incomplete or inaccurate personal data to be corrected;
- the right to object to our processing of your personal data;
- the right to require us to delete your personal data in some limited circumstances;
- the right to object to our processing of some or all of your personal data on grounds relating to your particular situation which are based on legitimate interests, at any time (and require such personal data to be deleted). If you object, we shall no longer process your personal data unless we can demonstrate compelling legitimate grounds for such processing which override your interests, rights and freedoms or where it is necessary for the establishment, exercise or defence of legal claims; and
- a "data portability" right to require us to transfer your personal data to you or to a new service provider in a structured, commonly used and machine-readable format.

If you wish to exercise any of the rights referred to above, please contact us using the details set out under "Contacting Us" below.

We review and verify data protection rights requests. We apply non-discriminatory principles when we action requests relating to your personal data, in accordance with applicable data protection laws.

We exercise particular care when receiving a request to exercise these rights on your behalf by a third party. We will ensure that the third party is correctly authorised by you to receive the requested information on your behalf.

If you wish to exercise any of these rights, please contact us (see Contacting Us below). You can also lodge a complaint about our processing of your personal information with the office of the UK Information Commissioner (<http://www.ico.gov.uk/>).

When exercising any of these rights, we may request specific information from you to prove your identity to our satisfaction so that we can safeguard your personal data from unauthorised access by someone impersonating you. Please note that due to the pseudonymised nature of the personal data we may receive about you, it may not be possible for us to identify your personal data in the dataset in order to comply with your request.

Contacting Us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data, or if you would like to exercise any of the rights listed above, please address questions, comments and requests to our Data Protection Officer at privacy@primarybid.com.

Changes to this policy

Any changes we make to this Privacy Notice in the future will be posted to our website at <https://primarybid.com/uk/legal>.