

## Introduction

“Cenkos”, “we” or “us” means Cenkos Securities plc.

This Privacy Notice explains how we use certain personal data that is collected from our website. It has been prepared in accordance with the General Data Protection Regulation (“GDPR”) and defined terms herein shall be read as defined in the GDPR unless stated otherwise.

We respect your privacy and we are committed to keeping your personal data safe. Under GDPR we are a Data Controller and we are responsible for ensuring that we process your personal data in accordance with GDPR.

## Type of personal data we hold

We may need to obtain personal data about you to deliver our products and or services to you. The nature of the products and or services that you request shall determine the type of personal data we might ask for, such as:

- Information that you provide to Cenkos. For example:
  - your first name, family name, job title, company name, company email address, business phone number, full business address;
  - curriculum vitae for job applications
  
- Information that we collect about you. For example:
  - a file with your contact history to be used for enquiry purposes so that we may ensure that you are satisfied with the services which we have provided to you;
  - basic IT information such as your browser type, IP address, internet service provider’s domain name, which pages you accessed on our website;
  - anonymised details about visitors to our website for the purposes of aggregate statistics or reporting. Note however, personally identifiable information is not automatically collected.

## How we use your information

Your personal data may be processed by us in the following ways and in order to:

- Maintain the quality of our website;
- Assess your application for our products and services;
- Understand your business needs and interests;
- Manage and administer our business;
- Comply with applicable laws and regulations;
- Administer and maintain the databases which store personal data;
- Enable customers to use our products and services.

The law requires that we use personal data for a variety of reasons, including to:

- Perform our obligations in accordance with the contractual relationships we have with our clients;
- Obtain your consent;
- Discharge our legal and regulatory obligations;

- Establish, exercise or defend our legal rights;
- Execute our legitimate business interests, such as:
  - allowing us to effectively and efficiently manage and administer our business operations and activities;
  - maintaining compliance with internal policies and procedures;
  - monitoring the use of our copyrighted materials;
  - enabling quick and easy access to information on our products or services.

We shall take steps to ensure that your personal data is accessed only by our employees that have a need to do so for the purposes described in this Privacy Notice.

## Information Technology safeguards

Our website is hosted by Investis Limited (“Investis”). Investis is a company registered in England and Wales with company registration number 03930926 and whose registered address is at 24 Fashion Street, London, E1 6PX.

Investis and/or Cenkos may collect anonymised details about visitors to the website for the purposes of aggregate statistics or reporting purposes. Investis shall respect your right to privacy and will process personal information you provide only in accordance with the GDPR, the Privacy and Electronic Communications (EC Directive) Regulations 2003 and other applicable privacy laws.

When you visit our website, Investis’s web server collects some basic information. Details of cookies that Investis uses on our website can be found on the [Cookie notice](#):

## Disclosure of your information to third parties

We shall take steps to ensure that your personal data is accessed only by our employees that have a legitimate business need to do so for the purposes described in this Privacy Notice.

From time to time we may also share your personal data outside of Cenkos:

- to third party agents or contractors (for example, our professional advisers or technology suppliers) that provide services to us. These third parties will only use your personal data as described in this Privacy Notice
- to the extent required to comply with applicable laws and regulations or to establish, exercise or defend our legal rights.

## Transfers of personal data outside the European Economic Area

The personal data that we hold about you may be transferred to and stored at a destination outside the European Economic Area “EEA”. It may also be processed outside of the EEA by personnel that work for our affiliates or for one of our third-party suppliers.

Where we transfer your personal data outside the EEA, we shall ensure that it is protected in a manner that is consistent with how your personal data will be protected by us when processed within the EEA. For example, this can be done in several ways whereby:

- the country that we send your personal data to is approved by the European Commission
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data in accordance with GDPR
- where the recipient of the transfer is in the US, it is a certified member of the EU-US Privacy Shield scheme.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we shall ensure that any transfer of your personal data is made in accordance with the GDPR.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of model contractual clauses which we have entered into with recipients of your personal data) by contacting us (see the “Contacting us” section below).

## Retention of personal data

How long we hold your personal data for will vary. The retention period will be determined by various considerations including:

- the purpose for which we are using it
- legal and regulatory obligations which may set a minimum period for which we must keep your personal data.

## Your rights

You have several legal rights in relation to the personal data that we hold about you. These include:

- the right to obtain information regarding the processing of your personal data and access to the personal data we hold about you;
- the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have a legitimate reason for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit that personal data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to and the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to or ask us to restrict our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the Information Commissioner’s Office if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us - see the “Contacting us” section below.

You can find out more information about your rights by contacting the Information Commissioner’s Office or by visiting their website at <https://ico.org.uk/>.

## Contacting us

If you would like further information on the collection, use, disclosure, transfer or processing of your Personal Data or about the exercise of any of the rights set out in this Privacy Notice, please send all questions to Cenkos Compliance (compliance@cenkos.com).