

Annington

Investors Privacy Notice

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Document owner: Data Protection Lead

1. What is this document and why should you read it?

This privacy notice explains how and why the Annington company you are contracting with and/or are engaged with (“we”, “us”, “our”), part of the Annington Group of companies (each such company and all such companies together referred to as “**Annington**”), uses personal data collected about past and current:

- investors of shares in the companies, vehicles or structures which own Annington, holders of Annington publicly listed debt and individuals that contact us with an interest in becoming investors/holders of the same (“**Investors**”); and
- contacts at lenders, contacts at rating agencies and other contacts for funding/regulatory purposes (“**Financial Contacts**”).

Each individual that falls under any of the categories mentioned above are referred to in this notice as “**you**” or “**your**”.

You should read this notice, so that you know what we are doing with your personal data.

Please note that this privacy notice supplements Annington’s website privacy notice (<https://www.annington.co.uk/privacy-policy/>) which also sets out how Annington uses your personal data when you use Annington’s website (the “**Website**”). You should read the Website privacy notice in conjunction with this notice.

This notice explains how we use your personal data when you make enquiries and/or become an investor/bond holder with us, or where work with you as a Financial Contact. Depending on your relationship with us, or Annington more widely, we or Annington may use your personal data for other purposes and one or more other Annington privacy notices may then also apply to such specific uses of your personal data.

Please also read any such other privacy notices from us or Annington.

2. Annington’s data protection responsibilities

Please refer to section entitled ‘Annington’s data protection responsibilities’ in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>

3. What types of personal data do we collect, and where do we get it from?

We collect and process different types of personal data about you when you make enquiries and/or become an investor/bond holder with us, or where work with you as a Financial Contact, or where you otherwise communicate or engage with us. We may also obtain some personal data from other sources, and create some personal data ourselves.

It is your responsibility to make sure the personal data you provide to us is complete and accurate and you must help us to keep it accurate and up to date. If you have a current or ongoing relationship with us and any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting dataprotection@annington.co.uk.

The table below sets out the different types of personal information that we collect. The details will be collected directly from you but sometimes may be obtained from other sources, for example authorised contacts and partners within your business, or any applicable regulatory authorities.

Occasionally, we will use your personal data when it has been provided by a person on your behalf, such as your spouse, partner, a relative, or your other representative e.g. your agent, solicitor or other professional adviser (your “**Representative**”).

Types of personal data

Investors

- Name, title
- Address, telephone and email address
- Your employer or organisation, your place of work and job title
- Business address, business telephone, business email address, fax number
- Details of opportunities with Annington you are interested in
- Shareholding/bond holding records and history
- Communication records and history
- Complaint/dispute records and history
- Any feedback you provide or is provided about you
- Copies of contracts and agreements
- Publicly available information e.g. Companies House records
- Details of your Representatives
- Any additional information that you provide to us voluntarily, including
 - Racial or Ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Health Data (which may relate to vulnerability or access)
- Your attendance at events arranged by or on behalf of us, and other events which we notify you of ("**Events**")
- Any additional information that you provide to us voluntarily, including (for example) requirements for attendance at Events including dietary or accessibility requirements

Financial Contacts

- Your name, employer or organisation, place of work, and job title
- Organisation, telephone number, fax number and email address
- Your contact/marketing preferences
- Communications we may have with you
- Details of your Representatives
- Any feedback you provide or is provided about you
- Copies of contracts and agreements
- Publicly available information e.g. Companies House records
- History of complaints, queries or disputes
- Details about the team you work with (both within your business/organisation and with Annington)
- Any additional information that you provide to us voluntarily, including
 - Racial or Ethnic origin
 - Political opinions
 - Religious or philosophical beliefs
 - Trade union membership
 - Health Data (which may relate to vulnerability or access)

4. What do we do with your personal data, and why?

We process your personal data for particular purposes in connection with the management and administration of your investment with us, lending to us or regulation of us, and, dependent on such use and your relationship with us, to deal with your communication or other engagement with us, and the management and administration of our business.

We are required by law to always have a "*lawful basis*" (i.e. a permitted reason or justification) for processing your personal data. The table below sets out the purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

Please note that where we have indicated below that our processing of your personal data is either:

- (a) necessary for us to comply with a legal obligation; or
- (b) necessary for us to take steps, at your request, to potentially enter into a contract with you, or to perform it,

and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract or engagement with you.

		Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
Communications with you					
a)	Responding to your requests, enquiries and/or complaints		✓	✓ (where mandatory for us to do so by law)	✓ (to respond to you in relation to such matters)
b)	Sending you information and Annington updates (including direct marketing) as set out in the section "How do we communicate with you?", below	✓ (direct marketing information where we need your consent)	✓ (keeping you updated on transactions)		✓ (to keep you updated on transactions and with other helpful updates and direct marketing in other cases)
Investors					
c)	Arranging investor conference calls, keeping records attendees and of discussions held, and publicising those discussions				✓ (to keep our investors updated, and for good record keeping practices)
d)	Corresponding with you about the status of your investment		✓		✓ (to keep our investors updated)
Financial Contacts					
e)	To deal with your requested or agreed funding to complete the transaction with you		✓ (if you contract with us as an individual)		✓ (where you represent your employer or organisation who contracts with us)
f)	To respond to your queries and requests for information				✓ (to comply with our legal and contractual obligations and good business practice)
g)	To facilitate our commercial/regulatory arrangement, such as requesting information from you or sending you updates				✓ (to comply with our legal and contractual obligations and good business practice)
All categories					
h)	Establishing and enforcing our legal rights and obligations			✓	✓ (to protect our business)
i)	Complying with requests, orders and instructions from law enforcement agencies, regulators, any court, parties to proceedings or otherwise deal with obligations required by law or			✓ (where binding)	✓ (where not binding but good governance and in the public interest)

		Lawful basis			
		Your consent	To perform a contract with you	To comply with a legal obligation	For our legitimate interests
	regulators and to ensure good governance and compliance				
j.	For our general record-keeping and relationship management		✓ (if you contract with us as an individual)		✓ (where you represent your employer or organisation, or a buyer or tenant who contracts with us and we need this to run our business properly)
k	Managing the proposed sale, restructuring or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organisation				✓ (to sell any part of our business)
l)	To keep records required by law or to evidence our compliance with laws, including tax laws, consumer protection laws and data protection laws.		✓		✓ (including compliance with related regulatory guidance and best practice)
n	Resolving any complaints from or disputes with you		✓ (if with you as an individual)		✓ (to try and resolve any complaint or dispute you might raise with us and to deal with legal claims)
n	Monitoring email traffic data and content				✓ (to monitor and manage access to and from our systems and to relevant records and data, to protect our networks and assets, and to protect personal data of employees, customers/clients and other individuals against unauthorised or unlawful access/use)

We may also convert your personal data into statistical or aggregated form to better protect your privacy, or so that you are not identified or identifiable from it. Anonymised data cannot be linked back to you. We may use it to conduct research and analysis, including to produce statistical research and reports.

5. Sensitive Information

5.1 'Sensitive Information' is information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, genetic data, biometric data for the purpose of uniquely identifying someone, data concerning health or data concerning someone's sex life or sexual orientation.

5.2 Please see the section entitled 'sensitive information collected through the website' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

6. **Who do we share your personal data with, and why?**

Sometimes we need to disclose your personal data to other people.

We are part of a group of companies. Therefore, we will need to share your personal data with other companies in the Annington group (for example, for shared services/division of functions) and/or our parent company group for key parental decision making and reporting purposes. Where any group companies process your personal data on our behalf (as our processor), we will make sure that steps are taken to protect the confidentiality, security and privacy of your personal data.

From time to time, we may ask third parties to carry out certain business functions for us, such as the administration of our website and IT services and support, financial checks, and marketing, records or database management. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to these third parties, we will seek to ensure that they have appropriate security standards in place to protect your personal data. Examples of these third-party service providers include our providers of IT systems software and maintenance, back up, and hosting services.

In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right (for the purposes set out above). Please see the section entitled 'who do we share your personal data with, and why?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>. In addition, we may also share your personal data with Event organisers and Event suppliers.

7. **Where in the world is your personal data transferred to?**

Please see the section entitled 'where in the world is your personal data transferred to?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

8. **How do we keep your personal data secure?**

We will adopt security measures to provide appropriate protection for your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage.

9. **How long do we keep your personal data for?**

Please see the section entitled 'how long do we keep your personal data for?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process your personal data, and any applicable laws or regulations.

We may in the future implement retention guidelines (and include a link to them here) which will set out further details about the period for which we keep records of your personal data. Please check back here from time to time if you would like to know more about retention.

As part of its data security framework, Annington uses immutable back-ups systems to ensure the integrity and availability of backed-up data. Such backups are designed so that once created they cannot be edited, deleted or overwritten in any way until the end of the defined retention period. This helps to protect against data corruption, accidental loss, and other cyber threats. If we have utilised our immutable back-ups, we will endeavour to ensure that data that has been subject to a deletion request is not restored back into our operating systems.

10. **How do we communicate with you**

Please see the section entitled 'how do we communicate with you' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

We may directly or with the support of our third party service providers manage any opt in by you to receiving Annington news and development updates from us, including by email, and any decision by you to change your mind and withdraw your consent.

11. **What are your rights in relation to your personal data and how can you exercise them?**

Please see the section entitled 'what are your rights in relation to your personal data and how can you exercise them?' in the Website privacy notice: <https://www.annington.co.uk/privacy-policy/>.

12. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the purposes for which and/or the way in which it is processed. We encourage you to check this notice on a regular basis.

13. **Where can you find out more?**

If you want more information about any of the subjects covered in this privacy notice or if you would like to discuss any issues or concerns with us, you can contact us in any of the following ways:

By email at: Dataprotection@annington.co.uk

By telephone at: 020 7960 7500

By post at: The Data Protection Lead, Annington, Hays Lane House, 1 Hays Lane, London, SE1 2HB, United Kingdom