

# Dealogic Product Privacy Policy

## Version 1.01 (2016)

Dealogic Limited and the Dealogic group companies (“we” or “us”) are committed to protecting and respecting your privacy (“you” or “your” refers to the person whose details are stored in our product(s)).

This policy (together with our terms of use and any other documents referred to in it) sets out the basis on which any personal information we collect about you, directly or indirectly, will be processed by us in Dealogic products and related services (“Products”). This information consists of business contact and related details which are used for legitimate business purposes by us in our Products and by our clients who use our Products. Our clients use the information in our Products for compliance purposes – to keep their own information up to date and to facilitate corporate access; to track consumption of resources and to ensure that activities are recorded and valued. Our Products facilitate interaction in the financial industry and the management of relationships and it is to individuals’ advantage that they are included in our Products. Please read the policy carefully to understand our views and practices regarding your personal information and how we will treat it.

For the purpose of the Data Protection Directive 95/46/EC and the Data Protection Act 1998 (Act) the data controller in the UK is Dealogic Limited, registered in England & Wales under registration number 1777183, with registered offices at One New Change, London, EC4M 9AF, United Kingdom.

This Product privacy policy sets out:

- 1) [Information we collect:](#)
  - a) Information you give us
  - b) Information obtained from your use of our Products
  - c) Cookies and IP addresses
  - d) Information from other Products
  - e) Information that other Product users give us
  - f) Information from publicly available sources
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## Information we collect

We collect your personal information (such as your name, business phone number, business email address, employer name and other business contact or biographical information) in various ways. Examples of personal information we may collect include (but are not limited to):

- Information you give us.
- Information obtained from your use of our Products.
- Information that other Product users give us.
- Information obtained from publicly available sources.

These are set out in more detail below.

### Information you give us

Examples of personal information you give us include (but are not limited to):

- Information that you provide when registering as a user of one or more of our Product(s), or update that information.
- Information you give us (or a colleague of yours gives us, such as your PA or assistant) if we contact you to verify or update your contact details.

### Information obtained from your use of our Products

Examples of personal information you give us include (but are not limited to):

- Information about your use of our Product(s)
- Information we ask for when you report a problem with our any of our Products.

We may aggregate information about the use of our Products for our business purposes. The aggregated information will not identify you.

### Cookies and IP addresses

Our systems may automatically record information such as your Internet Protocol (“IP”) address and location, device-specific information, when and how frequently you use our Products. We need much of this information to make our Products available to users and may use all or some of it to understand users’ preferences, to better serve users, and to improve our Products.

We use cookies or similar technologies in our Products. These cookies either store information in your device or access information that is stored in your device. We use cookies for strictly necessary purposes (e.g. authentication), functional purposes (e.g. to remember choices) and for performance purposes (e.g. analytic or tracking purposes). By using our Products you agree to our use of cookies and similar technologies. You may block cookies by changing the settings on your browser. However, if you do that, you may be unable to access certain parts of our Products. Unless you have adjusted your browser settings to block cookies, our Products will place cookies on your device when you log on to our web-based Products.

Here are further details about the types of cookies that we use in our Products:

| Category of use    | Example   |
|--------------------|---|
| <b>Preferences</b> | These cookies allow our websites to remember information that changes the way the site behaves or looks, such as your preferred language. For instance DealAxis uses a cookie called 'Language' to store the users preferred language. This is then used to control number format, date format and to translate the user interface in TicketManager.            |
| <b>Security</b>    | We use security cookies to authenticate users, prevent fraudulent use of login credentials, and protect user data from unauthorized parties. For example in Cortex we use cookies called FedAuth and FedAuth1 along with other cookies to help us to block many types of attack, such as attempts to steal the content of forms that you complete on web pages. |
| <b>Functional</b>  | Functional cookies help make the website work and deliver services that the website visitor expects to receive when navigating around web pages. Without these cookies, many of the web based Products cannot function properly. For example in DealManager, we use a cookie called dealno which stores the number of the currently active deal.                |
| <b>Analytics</b>   | Dealogic uses Google Analytics to help understand how their visitors engage with the products. It uses a set of cookies to collect information and report website usage statistics without personally identifying individual visitors to Dealogic. The main cookie used by Google Analytics is the '__ga' cookie.   |

For further information about cookies, please see <http://www.allaboutcookies.org/>

## Information from other Products

Your information may be held in more than one of our Products. Products may be provided by different companies in the Dealogic group. We may create new information about you by linking your information in one Product with your information in another Product. Where we hold your information on behalf of a client, we will only do this with that client's consent and in accordance with its instructions and we will keep your information secure.

## Information that other Product users give us

A client of our Products might be your employer and a user may be colleague of yours; a user might be a person at a sell-side firm or a buy-side firm that you work with, who knows you or who knows of you. Our Products facilitate contact between sell-side and buy-side professionals and the management of relationships. The purpose of the contact might be organising or attending conferences, events or corporate access. Users may input your personal information because they are planning to meet you or have met you, as they would in the contacts section of an email client like Microsoft Outlook, or in a CRM.

We do not hold this information in our own right, but as the corporate user's data processor.

## Information from publicly available sources

We may use publicly available sources to obtain or validate contact or biographical information about you. For example if you have moved to another firm, we may check the previous firm's website and your new firm's website to make sure that's the case and to update your details.

## How we use your information

We will use your information in the following ways:

- If you are a user, to provide our Product(s) to you and allow you to use them.
- To populate our Product(s) (note that your information in one Product may be accessed by other Products).
- To link your information in one Product with information in another Product.
- To provide your information to users, either within the Product(s) or as a separate data feed. This allows users to contact you or arrange to meet you. The data feed allows our clients to update their own information.
- If you are a user, to ensure that the content in our Products is presented in the most effective manner for you, your computer and systems.
- To carry out our obligations under contracts between us and clients of our Product(s).
- If you do not work for an existing client of ours, we may contact you with marketing information about our Product(s).

## Where we store your information and cross border transfers

Deallogic is a global business. Your information will be stored on servers within and outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Those staff may be engaged in, among other things, the provision of support services.

We will take all steps reasonably necessary to ensure that your information is treated securely and in accordance with this Product privacy policy.

## Disclosure of your information

We may disclose your information to any member of the Deallogic group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may disclose your information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your information to the prospective seller or buyer of those business or assets.
- If any Deallogic group company or substantially all of any of a Deallogic group company's assets are acquired by a third party, in which case information held by that company will be one of the transferred assets.
- If disclosure is reasonably necessary for operation of the Products and where we have entered into what we consider to be appropriate agreements with any third parties, covering confidentiality, security and compliance with laws (including data privacy laws).
- If we are under a duty to disclose or share your information in order to comply with any legal obligation or in order to enforce or apply our “Terms of use” and other agreements; or to protect the rights or property of the Deallogic group or the safety of employees, our customers or others.

## Your rights

You have a right to access your information and to get mistakes corrected. To exercise your rights please contact us at [privacy@deallogic.com](mailto:privacy@deallogic.com)

We may, if you are not already a client of ours, contact you with marketing information about Products. You may ask us not to start, or to stop, contacting you in this way at any time. To exercise this right, please email us at [privacy@deallogic.com](mailto:privacy@deallogic.com) or use the opt-out option in the communication.

If you object to our use of your information in the way described in this policy, please contact us at [privacy@deallogic.com](mailto:privacy@deallogic.com) setting out details of your reasons. We can take into account good reasons, for example if your rights or freedoms or legitimate interests are being prejudiced by our use, or if our use is causing you substantial and unwarranted damage or distress.

## Changes to this Product privacy policy

Any changes we may make to our Product privacy policy in the future will be posted on this page.

## Contact

Please refer any questions, comments and requests regarding this Product privacy policy to [privacy@deallogic.com](mailto:privacy@deallogic.com)