

Product Privacy Notice

Last updated: 13 April 2018

Who are we

We are Dealogic Limited (referred to as “Dealogic” and “we” throughout). Please click [here](#) for our details and those of other Dealogic group companies.

This Notice sets out how Dealogic will use your (work-related) personal information in its capacity as a controller as defined by the General Data Protection Regulation (GDPR).

Use of your personal information is based on our own legitimate interests, the legitimate interests of our clients and users of our products and more generally, the important public and economic interest of facilitating compliance and business within the banking and investment sectors.

Dealogic is committed to protecting your personal information and takes the security of your information very seriously. We have strict security measures in place to protect your personal information. This includes robust access procedures and use of encryption.

If you have any concerns or would like to contact us about any aspect of this Notice, please get in touch through the contact details at the bottom of this Notice.

The Information we collect about you and its sources

Users of Dealogic products

We will collect personal information directly from you when you register your details to use any of our products and then access them. This information includes passwords, user preferences and usage and analytics data.

If you contact our helpline or ask for assistance on technical issues we will also keep a record of this fact as well as how it was resolved.

We may use your business contact details in order to send you relevant communications. Please refer to the ‘Marketing Communications and your choices’ section below.

We may (alternatively or in addition) obtain some data from your employer or the organisation who made it possible for you to use to any of these Dealogic products when they provide us with your credentials or contact data in order for us to set up your access to our products and manage your usage. This information may include your name, email and role.

Contacts Data Feed and other products

If your details are relevant for other professionals working in the banking sector, we may collect data about you in certain of our products, including the Contacts Data Feed product. This personal information will come from a variety of publicly available sources such as business and official websites: we may also contact you or your employer to confirm the information is accurate and up to date.

The data we collect may include your name, employer, email address, employer address, phone number, job title, biographical details, qualifications and professional associations. For some products it may include investor profile (which may include details of funds managed and investment approach), shareholdings, or (in our compliance products) signatory details.

Some personal information may be accessible through our products but not stored or processed by us; for example if a client of ours buys a subscription to a third party product containing company officers' details, our client will have access (through our product) to those details, but we will not. We act as "mere conduit" and are not a controller or a processor of those personal information.

How and why we use your personal information

We use your personal information for legitimate business reasons, namely to enable your use of our products and/or within our products, which other users can access. Ultimately, your personal information are used for the important public and economic interest of facilitating compliance and business within the banking and investment sectors. The GDPR's term for these reasons is "legitimate interests". In particular, we process users' personal information for these business-related purposes:

- **Account setup and administration:** We use personal information such as your name, email address, phone number, and information about your device to set up and administer your account, provide technical and customer support and training, verify your identity, and send important account, subscription, and service information.
- **Marketing and events:** We use personal information to deliver marketing and event communications to you (in your work capacity as a contact of ours, and if you have not objected).
- **Research and development:** We use personal information for internal research and development purposes and to improve and test the features and functions of our products.

- We may also use personal information to meet our internal and external audit requirements, information security purposes, and as otherwise permitted or required by law. Our use will be necessary and proportionate.

We are also a controller of personal information in our Contact Data Feed product and certain other products. The personal information in those products may be used by our clients:

- For compliance purposes, for example to suppress non-compliant personal information;
- For regulatory and related purposes, including to ascertain shareholdings and confirm certification of eligibility to trade; and
- To facilitate contact and manage relationships in banking and investment sectors.

You can find further details in the table below.

1. For product users: to provide you with the access to our products in line with our agreement with your employer or another client of ours and manage that access efficiently

We need to hold some details about you to ensure you can use our products correctly and that they function in the way that was intended. We have a legitimate interest in understanding how our products are being used so that we can continue to improve them and our offerings to our clients (your employer). We also have an obligation to keep our products, and the information held in them, safe and secure from external threats or bad actors.

Additionally, we will need to use your data so that we can address any issues you may have around using our products.

2. For the Contact Data Feed: this product contains publicly available personal and institutional information. Other Dealogic products may contain the same personal information, sub-sets of the same personal information or related personal information such as investor profiles, shareholdings in or signatory details

The provision of this data assists in the effective operation of the market by helping people make the right decisions and understand key investors and activities in the market.

We consider that the privacy rights of individuals whose data is made available in this product are not prejudiced because the information in question is already in the public domain; it is in the interests of the efficient functioning of the financial markets for sellers and investors to have access to

these details and help enrich strategic decision making; and because inclusion in our products also helps those individuals to connect with others and build relationships, which benefits their work and therefore ultimately themselves personally.

Dealogic takes steps to ensure the information is accurate and up to date, and in the case of usage and product performance, personal information is protected by appropriate security measures and/or used in aggregated, pseudonymised, or anonymised formats.

Dealogic also has in place a process to ensure it can act upon any requests made under the provisions of Chapter 3 of the GDPR (individual rights).

Recipients of this data will have their own obligations to comply with the General Data Protection Regulation or other applicable privacy laws.

Who we may pass your data on to

Where appropriate, we may disclose your personal information to:

- Banks and Investment Managers provided both entities are relevant in the context of interaction/consumption data i.e. provided that your personal information forms part of the record which describes the interaction between a particular Bank and Investment Manager or groups of Banks and Investment Managers;
- Investment firms who may need your business details to contact you in a professional capacity: such organisations will be obliged to comply with any applicable privacy laws;
- Any member of our group of companies ([see details](#)) for internal administration purposes and to try to ensure our products work efficiently and are resilient;
- Third parties who we have engaged to help us provide our products and services including those providing technological support and development, back up and resilience, cloud hosting services.

We may also disclose your personal information to third parties in the following circumstances:

- a) Where we sell any of our business and/or assets to a third party
- b) Where we are legally permitted or obliged to disclose your information.

In exceptional circumstances, Regulators and law enforcement agencies may also request your information from us and we will provide them with your information only when there is a legal basis to do so.

How long we keep your personal information for

The length of time that we will retain your personal information for will vary depending on a number of factors such as the Dealogic product and any regulatory or legal obligations relating to it, and the length of your employer's agreement with us. As an example, some of our products support significant regulatory compliance efforts (e.g. MiFID II) in our banking clients and data may be required to be retained for longer periods (e.g. over seven years).

Where we send your personal information

The data that we collect to enable our products to function in the way intended and to understand performance and usage may be transferred to, and stored at, a destination outside the European Economic Area (EEA). It may also be processed by Dealogic employees or those of our suppliers who are not located in the EEA.

When we transfer personal information from the European Economic Area to other countries where applicable laws do not offer the same level of data privacy protection, we take measures to provide an appropriate level of data privacy protection. In other words, your rights and protections will remain with your data regardless of where it is being accessed from or processed. For example, we use approved contractual clauses and have an intragroup agreement in place to ensure that the recipients of your personal information protect it. You may request further information by contacting privacy@dealogic.com.

Marketing Communications and your choices

We may contact you to tell you about other products or events that you may be interested in but you will always be given the option to opt-out of receiving these communications.

Some emails you receive from us may be service messages in which case we will make it clear that this is the case.

Your rights

In parts of the world, such as Europe, individuals will have certain rights in relation to their personal information – these rights may only be applicable in certain circumstances and where certain relationships exist between the individual and the organisation who is using their data.

Where Dealogic is acting as a controller (i.e. Contacts Data Feed and other products or usage data as described above), you will have the right to make a request to us:

- for access to your personal information
- for rectification or erasure of your personal information
- for restriction of processing concerning you
- to object to our processing which is based on legitimate interests (including any profiling)
- to object to direct marketing (including any profiling)
- to object to research purposes
- to port data you have provided to us, either to you or to another provider.

These rights are more complicated than the simple summary above. To find out more about them, please visit the [Information Commissioner's website](#) or the website of your local data protection regulator.

If you wish to exercise your rights, please contact us at privacy@dealogic.com

In all other cases Dealogic will be acting as a data processor so if you wish to exercise any of these rights you should, in the first instance, contact your employer or the organisation who made it possible for you to use to any of our products.

Please note that certain investors will use Dealogic Connect Tracking Data for compliance purposes, which means Dealogic itself will not be able to correct or delete Tracking Data that is submitted by another user of the Dealogic Connect product, even if such Tracking Data contains information that personally identifies you.

You have a right to lodge a complaint with a supervisory authority. Dealogic Limited's supervisory authority is the Information Commissioner.

More questions?

If you have any questions about this notice or about how we process your personal information, please contact privacy@dealogic.com. You may also write to the General Counsel at Dealogic Limited – the registered address can be found [here](#).