
Shareholder Privacy Statement

GDPR Privacy Statement

January 2021



In this Statement, "Record", "we", "us" and "our", refer to Record plc, registered in the United Kingdom with registered office at Morgan House, Madeira Walk, Windsor, Berkshire SL4 1EP. Record plc's company registration number is 1710736.

Record is committed to safeguarding the personal information, such as names, contact details, details of shareholdings and ID data ("Personal Information") of our shareholders. To the extent that any such Personal Information is held by us, it will be held in confidence in accordance with the Data Protection Legislation (as defined below). Please read the following Privacy Statement which explains how we use and protect your information.

We will only use Personal Information which is provided to us, or otherwise obtained by us, as set out in this Statement. We will ensure that your Personal Information is handled in accordance with the "Data Protection Legislation" (meaning any law applicable to Record from time to time relating to the processing of Personal Information and/or privacy as the same may be re-enacted, applied, amended, superseded, repealed or consolidated, including without limitation the General Data Protection Regulation (EU) 2016/679 including any legally binding regulations, directions and orders issued from time to time under or in connection with any such law).

You acknowledge that we may collect, use and transfer your Personal Information as set out in this Statement. Record reserves the right to change this Statement from time to time and will publish any new versions of this Statement on our website.

For the purposes of the Data Protection Legislation, Record is deemed to be the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

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1. PERSONAL INFORMATION THAT WE COLLECT FROM YOU

When you apply for, buy or otherwise acquire shares in Record, you will be required to provide Personal Information about yourself including your name and contact details (e.g. address, email address and telephone number), ID data, NI numbers and/or other personal identifiers). Some of this Personal Information is collected and processed so we can perform a contract with you, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to issue shares, maintain our shareholder register and run our business).

If you are acting as a representative or agent and providing the Personal Information of another person to us, you are responsible for notifying that individual that we have their Personal Information and directing them to this Statement so they can see how we will process their Personal Information.

2. PERSONAL INFORMATION THAT WE RECEIVE FROM OTHER SOURCES

We may receive information from third parties who collect Personal Information from you and pass it on to us. Where this is the case the third party is responsible for informing you that they have shared your Personal Information with us, directing you to this Statement and obtaining any relevant consents from you to ensure you are happy with the ways in which your Personal Information will be shared. However, once we are holding it, we will only handle any person's Personal Information in accordance with this Statement.

We have appointed a third party provider to act as registrar as such they are the main processor of Record's shareholder data.

3. SENSITIVE PERSONAL INFORMATION

"Sensitive Personal Information" (sometimes also called "special category" personal information) is particular types of Personal Information, for example information concerning an individual's race, ethnic origin, religious beliefs, health, political opinions or sexual orientation.

You may provide us with Sensitive Personal Information from time to time in connection with your shareholding or otherwise. In such cases, the provision of this information is entirely voluntary and the act of providing this information is a clear, affirmative act of consent for us to use that information for the purpose for which it was provided. We will use any Sensitive Personal Information in accordance with the purpose for which it was provided (i.e. with your consent) and, where necessary, we may also process such information in the establishment, exercise or defence of legal claims.

Where we do receive Sensitive Personal Information, we will only keep such information for as long as strictly necessary in order to comply with our obligations under the law.

4. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We will only use your Personal Information in order to (a) consider applications for shares, (b) update and maintain our shareholder register, (c) comply with our own legal and regulatory obligations, and (d) for our internal business purposes – such as record-keeping.

5. HOW WE SHARE YOUR PERSONAL INFORMATION

Where it is necessary for the performance of any contract with you or for the purpose of our internal business processes, we may share your Personal Information with certain third parties, such as inter group companies, our professional advisers, service providers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated or affiliated companies of the foregoing for the same purposes.

By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. We ask all third parties to treat your Personal Information securely and in accordance with this Statement and will take reasonable steps to enforce this. We will never sell your data.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal obligation (such as anti-money laundering or anti-terrorist financing obligations), carry out an internal investigation, enforce an agreement, or protect the rights, property, or safety of Record, our group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

In exceptional circumstances, if we are sold or merged with another company we may disclose your information to a potential buyer, including your Personal Information and other information concerning your shareholding.

6. OUR SECURITY MEASURES AND INFORMATION ABOUT WHEN WE DELETE DATA

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows. Generally speaking we will retain your Personal Information for as long as you are a shareholder and may retain some of your Personal Information thereafter for record-keeping purposes.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information if you transmit it to us email or via our website; any transmission is therefore at your own risk.

Some of our premises use CCTV for the purpose of crime prevention, however, this is under the control of a third party and therefore you should consult any notices they display and their privacy statements for more information.

Any Personal Information provided to Record will be transferred to and stored on Record's servers in the UK. We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

7. TRANSFERRING PERSONAL INFORMATION OUTSIDE OF THE EEA

In processing your Personal Information, it will sometimes be necessary for us to transfer your Personal Information outside the European Economic Area ("EEA") to our staff and our third-party service providers. It may also be accessed by staff operating outside the EEA who work for us or for one of our suppliers or group companies. This includes people engaged in, among other things, the provision of support services to us. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Statement and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to our non-European offices and Funds and to third parties based outside the EEA if that party (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information, (b) has agreed (by way of written contract incorporating the "model clauses" as approved by the European Commission or by some other form of data transfer mechanism approved by the European Commission) to provide all protections to your Personal Information as required by the Data Protection Legislation or (c) we have your explicit consent to do so (such as where you have requested a service from one of our Funds situated outside the EEA). Where any transfer takes place under a written contract, you have the right to request a copy of the privacy safeguards in that contract and may do so by contacting us at GDPRqueries@recordcm.com. For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

By submitting your Personal Information to us, you acknowledge this transfer, storing or processing of your Personal Information.

8. ACCESSING AND UPDATING YOUR PERSONAL INFORMATION

You are entitled to know some details about the Personal Information we hold about you and how that information is processed. If you would like to request this, please contact us at GDPRqueries@recordcm.com and we will provide you with the information to which you are entitled.

You can also ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal ground for us to hold it; or (c) in some circumstances, transfer any information we hold about you to a specified third party. If you wish to exercise any of these rights, please contact us at GDPRqueries@recordcm.com.

9. COMPLAINTS

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us at GDPRqueries@recordcm.com. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office regarding such issues.

10. CHANGES TO THIS PRIVACY STATEMENT

Record may amend this Statement. Any changes to this Statement will be posted on Record's website.

11. OUR CONTACT INFORMATION

If you have any questions, please feel free to contact us by email at: GDPRqueries@recordcm.com.



record

Listen
Understand
Deliver

recordfg.com