# Numis

# This privacy notice tells you what to expect when Numis collects personal information. This applies to information we collect about:

- Clients and prospective clients
- · Contacts at firms we deal with in both a client and non-client capacity
- People who call us
- People who e-mail us
- Visitors to our website
- Job applicants and our current and former employees

Numis may use personal data to provide services requested from us, manage accounts, make decisions, detect and prevent financial crime, for analysis and assessment, and to ensure that we comply with applicable legal and regulatory requirements

### Visitors to our website

When someone visits <u>http://www.numiscorp.com/x/default.html</u> we use our third party web host E-Cube, to collect standard internet log information and details of visitor behaviour patterns. We do not use this and it is only processed in a way which does not identify anyone. We do not make, and do not allow E-Cube to make, or attempt to find out the identities of those individuals visiting our website.

#### Cookies

As with the above Cookies will be used to gather information about the users of the website but are not used by Numis or e-cube in any way to identify the individual users.

## **Clients**

Numis has legal obligations under the money laundering regulations 2007 to identify and verify its customers and perform ongoing monitoring on customer data. As part of customer identification ("KYC") procedures Numis collects personal information and in some cases sensitive personal information, such as phone numbers, e-mail addresses and financial details, along with identification information such as date of birth, residential address and nationality. Numis may also hold personal information (including sensitive personal information) obtained through publicly available sources such as credit agencies, media publications and company registries.

In the interests of fraud prevention and the prevention of financial crime(s) your customer identification data will be shared with third parties who perform monitoring services on behalf of Numis; these third parties are required to adhere to the same high privacy standards as Numis.

Your personal data will only be shared in accordance with data protection laws where deemed necessary and where third parties are providing services to Numis as part of our ongoing services and in order to satisfy our legal and regulatory obligations and/or provision of our ongoing services to clients.

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Numis also utilises cloud storage solutions that may in some cases mean that personal data will be stored on servers held in other countries, for example the USA. As with all our third party data processors, they will be required to adhere to our high standards of data privacy.

Numis uses a third party provider called Salesforce to help us store and manage client information to assist us in providing the best service to our clients. The Salesforce privacy notice can be accessed on the following link: <u>https://www.salesforce.com/uk/company/privacy/full\_privacy.jsp</u>

Please see Numis's data protection policy (available on our website) for further information on how we ensure your personal information remains secure and is treated with the utmost care and in line with current UK laws and regulations.

### People who contact us

Contact information obtained by Numis as part of business related discussions or data relating to existing client relationships may be held as part of our records for as long as deemed necessary in order to further prospective and ongoing client relationships. Where contacted for marketing purposes these individuals will be given the opportunity to have their information removed from our records. Otherwise information will be processed and deleted in line with our retention schedule.

#### Via e-mail

Any email sent to us, including any attachments, may be monitored and used by us for reasons of security and for monitoring compliance with company policy. Email monitoring or blocking software may also be used. Please be aware that you have a responsibility to ensure that any email you send to us is within the bounds of the law.

#### **Over the Telephone**

Numis records telephone calls as part of its ongoing regulatory obligations and for monitoring and training purposes. These calls are kept for a pre-determined amount of time; however this can be extended if our regulator makes such a request. The calls are stored securely and with limited access given to specific employees.

### Job applicants, current and former Numis employees

When individuals apply to work at Numis, we will only use the information they supply to us to process their application and to monitor recruitment statistics. Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing them beforehand unless the disclosure is required by law. These checks are facilitated by a third party who is based in the EU and we expect to adhere to the same data privacy standards as Numis.

Personal information about unsuccessful candidates will be held and destroyed in line with our retention schedule after the recruitment exercise has been completed. Some records are held to create a pipeline of talent for future recruitment. We may retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.



Once a person has taken up employment with Numis, we will compile a file relating to their employment. The information contained in this will be kept secure and will only be used for purposes directly relevant to that person's employment. Once employment with Numis has ended, we will retain the file in accordance with the requirements of our retention schedule and then delete it.

Employees of Numis agree that their personal data will be used and shared in accordance with our internal policies and that all correspondence made on work equipment will be recorded in line with our regulatory (FCA) requirements.

#### **Complaints or queries**

Numis tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of Numis's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the Numis contacts listed on our website.