

# Shareholder Privacy Policy



This Privacy Policy is designed to tell you about our practices regarding the collection, use, and disclosure of information if you are an individual and are a current or former registered shareholder of BTG.

Whilst BTG processes your personal data in its capacity as a data controller this Privacy Policy also extends to the share registry services which are currently carried out by Link Asset Services, but which may change from time to time, (the "Registrar"). We have appointed the Registrar under the rules of the Companies Act to [manage our register of shareholders]. The Registrar's role [includes keeping an up-to-date record of shares held by shareholders, administration of dividends, managing share transfers, issuing share certificates and supporting other regulatory functions]. In carrying out registry services, the Registrar processes personal data about you as a shareholder on our behalf.

## Information collected by BTG

We may collect the following types of information:

- your title, name, your age, date of birth, your address, telephone number and your email address;
- passport number, ID card and driving licence;
- details of past and present shareholdings and/or interests in BTG and voting rights attached to such shares;
- details of how you have in the past exercised, or intend in the future to exercise, your voting rights attached to shares in BTG;
- shareholder reference number;
- your bank or building society account details into which dividends and other income or capital returns on your shares have in the past, or should in the future be paid; and
- your voice, where this is captured by audio recording equipment at a shareholder event.

## How is your data collected

We collect your personal data, with the help of the Registrar, by one or more of the following methods:

- where you provide it to us, either voluntarily or at our request;
- by third parties acting on your behalf providing certain of these details to us, such as stock brokers and other agents through whom you may have acquired or disposed of your shares or interest in shares;
- where you exercise your rights in respect of your shares, including by your attendance at general meetings and voting in person or by your casting proxy votes, whether in hard copy form or by submitting electronic instructions;
- stock transfer forms shareholder application forms; and
- by capturing your voice on audio recording equipment, for example on any recordings made of our general meetings if you attend such meetings, and on any recordings made of other presentations to shareholders if you attend such presentations.

## Purposes for processing

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- where we need to comply with a legal obligation (such as maintaining and administering the Company's register of members or maintaining and administering a register of beneficial ownership);
- where we need to manage your shareholding in BTG and keep your record on the shareholder register up-to-date;
- making shareholder communications and shareholder meeting materials available to you, such as the Annual Report and the Notice of Annual General Meeting;
- where we need to comply with a contractual obligation (such as communicating with you in accordance with the provisions set out in the Articles of Association of BTG);
- paying dividends and interest payments to you;
- allowing you to exercise your rights as a shareholder, such as the right to vote at shareholder meetings; and
- responding to any correspondence you send to us.

## Lawful grounds for processing

Our processing of your personal data is necessary:

- **to comply with our legal obligations to collect and process certain personal data about you**, for example to record your details in our statutory register of members, to pay you amounts due on your shares and to enable you to exercise your rights attached to shares and to send you certain information. You may also have legal obligations to provide us with certain information about you, for example where we make a statutory demand to ascertain the beneficial ownership of shares. If you fail to provide certain information when requested to enable us to comply with our legal obligations, you may not be recognised as a shareholder of BTG and/or you may not be entitled to exercise or enjoy your rights attaching to your shares in BTG and/or we may not be able to fulfil our other obligations to you;
- **for the performance of contracts to which you will be a party to and in order to take steps at your request prior to you entering into those contracts**, for example to comply with our obligations set out in any shareholders agreement that we have entered into with you; and
- **for the purposes of legitimate interests pursued by us , namely to:** (i) manage and administer our shareholding; (ii) operate our business; and (iii) keep our shareholders informed about our products and services.

## Sharing your personal data

We may disclose your personal data to:

- The Registrar , who manages our share register and help us manage dividend and other payments to our shareholders;
- other members of the BTG group, as necessary to operate our business;
- solicitors and professional service firms who provide us with legal support in relation to our services or any litigation;
- service providers who help operate our IT and back office systems;
- regulators who regulate how we operate, these include the Financial Conduct Authority, the London Stock Exchange, HMRC and the Information Commissioner's Office;
- to third parties where we consider disclosure is necessary as a matter of law; to exercise, defend or protect our legal rights;
- if the law requires or permits disclosure, or there is a duty to the public to share or disclose your personal data e.g. for the purpose of verifying shareholdings or contacting shareholders about matters relating to the company, their shareholding or a related exercise of rights;
- we occasionally use other companies to provide limited services on our behalf, including (but not limited to) printing, packaging and mailing company reports. We will only provide those companies the information they need to deliver the service and they are prohibited from using that information for any other purpose(s);
- In addition to the above, we will share your personal data:

- with a potential buyer in connection with (a) the sale, assignment, or other transfer of our business, in which case we will require any such buyer to agree to treat it in accordance with applicable data protection legislation; or (b) where required by applicable laws, court orders, or government regulations; and
- to any of our affiliates worldwide that agree to treat such information in accordance with this Privacy Policy or a policy which is no less restrictive than this Privacy Policy.

## **Data Transfer Abroad**

Information about you in our possession may be transferred to other countries (which may include countries outside the EEA). You understand and accept that these countries may have differing (and potentially less stringent) laws relating to the degree of confidentiality afforded to the information it holds and that such information can become subject to the laws and disclosure requirements of such countries.

When we, or our permitted third parties, transfer your information outside the European Economic Area, we or they will impose contractual obligations on the recipients of that data to protect your information to the standard required in the European Economic Area. We or they may also require the recipient to subscribe to international frameworks intended to enable secure data sharing. In the case of transfers by us, we may also transfer your information where: (i) the transfer is to a country deemed to provide adequate protection of your information by the European Commission; or (ii) where you have consented to the transfer.

## **Your rights**

You have a number of rights concerning the way that we use your information. At any time, you have the right to:

- be informed about the processing of your personal data (i.e. for what purposes, what types, to what recipients it is disclosed, storage periods, any third party sources from it was obtained, confirmation of whether we undertake automated decision-making, including profiling, and the logic, significance and envisaged consequences);
- request access to or a copy of any personal data we hold about you;
- request the rectification of your personal data, if you consider that it is inaccurate;
- request the erasure of your personal data, if you consider that we do not have the right to hold it;
- object to your personal data being processed for a particular purpose or to request that we stop using your information in certain circumstances; or
- ask us to transfer a copy of your personal data to you or to another service provider or third party where technically feasible.

Any request for access to or a copy of your personal data must be in writing and we will endeavour to respond within a reasonable period and in any event within one month in compliance with applicable data protection legislation.

## **Personal data Retention**

We will only keep the information we collect about you on our systems or with third parties for as long as required for the purposes set out above or as required to comply with any legal obligations to which we are subject. We will delete, destroy or anonymise data that is no longer needed for the purposes.

## **Automated processing**

We do not carry out automated decision-making or profiling in relation to your personal data.

## **Changes**

As part of BTG's commitment to compliance with data protection legislation, and to reflect changes in BTG's operating procedures, BTG may update the terms of this policy from time to time. If the changes we make are material, we also may post a notice regarding the changes on our website. Subsequent changes in this Privacy Policy will not apply to information that was collected before such change was made. This Privacy Policy was last updated on [● June 2018].

## Contact Information

If you have any questions, concerns or comments about this Privacy Policy, wish to exercise any of your rights or if you wish to contact BTG (and its data protection officer) about the personally identifiable information held about you, please email BTG at [info@btgplc.com](mailto:info@btgplc.com) [or the Registrar].

If you have any concerns about our use of your information, you also have the right to make a complaint to the Information Commissioner's Office, which regulates and supervises the use of personal data in the UK, via their helpline on 0303 123 1113.