

Privacy Statement

1. Information about our Organisation and Website

- 1.1 Marnix Europe Ltd. ("Marnix", "we", "us") respects your right to privacy. This privacy statement explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. Our website is operated by Marnix which is registered in England and Wales with registered company number 2448482 and registered office address at 95 Gresham Street, London EC2V 7AB.
- 1.2 Marnix is registered with the Information Commissioner in the United Kingdom and the notification/registration number is Z4797183.
- 1.3 If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at clause 10.1 below.

2. Collection, Use & Retention of Personal Information

- 2.1 This privacy statement, together with any other documents, policies, notices or other statements referred to herein, sets out the basis on which we process personal information about you.
- 2.2 We have set out below the categories of individuals about whom we collect and process personal information and a description of the types of personal information that we may collect from them:

Job Applicants

- 2.3 If you apply to Marnix for a job via our website, you may give us personal information about you (including your CV) via your online recruitment account ("Account") on our website. Your Account requires a valid e-mail address as a login, along with other information which will be of a personal nature, such as your name and professional experience.
- 2.4 You may also provide details of referees. Please note that you are responsible for obtaining the referees' consent, for referring them to this privacy statement and ensuring they are aware that their details will be forwarded to, and used by, Marnix for reference purposes.
- 2.5 Your information may be used by Marnix for recruitment purposes and notifying you of current vacancies which match your qualifications and/or preferences..
- 2.6 Some of the personal information that you provide may include sensitive personal information. For example, we may collect information relating to criminal offences, which we need in relation to checking fraud/bribery concerns, and information about your race or ethnicity, which we need for equality and diversity monitoring in job applications.

Suppliers, Vendors, Business Advisors

- 2.7 If you work for one of our Suppliers, Vendors or Business Advisors, you will provide us with some personal information about you such as your name and business contact details. We will use this information for enquiries you make to us such as business enquiries, offers to supply, accounting and other enquiries.
- 2.8 Marnix may receive personal data from third party sources in the context of screening in accordance with Marnix and statutory bribery rules (e.g. from a subscription service, Companies House, reports

or other databases), to validate notice provisions and signatories in contracts and to prepare various briefing documents.

Customers

- 2.9 If you work for one of our Customers, you will provide us with some personal information about you such as your name and business contact details. We will use this information to fulfil any orders that you make with us.

Office Visitors

- 2.10 Office visitors are required to report to the building reception in all of Marnix offices. In most cases we will collect your name, company and other basic details about the purpose of your visit and your contact details for administrative, notification and housekeeping purposes.

Research References

- 2.11 Various Marnix business units obtain publicly available research material in order to collate various business reports and internal research. As part of this Marnix processes the names of the authors of such research in order to carry out internal research and compile business reports.

Website Users

- 2.12 We may ask you to supply personal information at certain points on our website, such as your name, email address and other information. The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information. For example, we may ask you to provide your contact details when you enquire about particular products and/or submit enquiries to us. We will then use the information we have collected to respond to your enquiries or requests.
- 2.13 We also collect any information you may choose to provide in your communications with us. Such information may be used to facilitate activities in the course of our business. We may combine such information with other personal information we collect.

Information collected automatically about our website users

- 2.14 In addition to the information you knowingly provide, we may collect certain information automatically from your device. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws. Specifically, the information we collect automatically may include domain names, your IP address, device type, unique device identification numbers, broad geographic location (e.g. country or city-level location), along with usage statistics (e.g. types of web browsers and operating systems used) and browsing history (e.g. how your device has interacted with our website, including the pages accessed and links clicked).
- 2.15 Collecting this information enables us to better understand the visitors who come to our website, where they come from, and what content on our website is of interest to them. We use this information for internal analytics purposes and to improve the quality and relevance of our website to our visitors.
- 2.16 Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Site Traffic Information and Cookies" below.

Information that we obtain from third party sources

- 2.17 From time to time, we may receive personal information about you from third party sources but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.
- 2.18 The types of information we collect from third parties and the purposes for which we use such information are described above in clause 2.8.
- 2.19 In general, we will use the personal information we collect from you only for the purposes described in this privacy statement or for purposes that we explain to you at the time of collecting your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as statistical purposes) if and where this is permitted by applicable data protection laws.

3. Disclosures of Personal Information

- 3.1 We may disclose your personal information to the following categories of recipients:
- (a) to our group companies within the Marubeni Group, which means our subsidiaries, our ultimate holding company and its subsidiaries, as defined in section 1159 of the UK Companies Act 2006, for facilitating activities in the course of our business and internal management;
 - (b) to third party service providers and partners who provide data processing services to us (for example, to support the delivery of, provide functionality on, or help to enhance the security of our website), or who otherwise process personal information for purposes that are described in this privacy statement or notified to you when we collect your personal information;
 - (c) to any competent law enforcement body, regulatory body, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
 - (d) to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this privacy statement; and
 - (e) to any other person, if you have provided your consent to the disclosure.

4. Legal basis for processing personal information (EEA visitors only)

Website Users

- 4.1 If you are accessing our website from the European Economic Area, our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

Other

- 4.2 However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect

personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

4.3 If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as notifying you of the possible consequences if you do not provide your personal information).

4.4 Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

4.5 If you have questions or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

5. Security

5.1 Transmission of information via the internet is not always secure. We cannot guarantee the security of your data while being transmitted to our site; any transmission is at your own risk. However, after we have received your information, whether collected on our website or otherwise, we take appropriate technical and organisational security measures to prevent unauthorised access, improper use or disclosure, unauthorised modification, unlawful destruction or accidental loss of personal information once it is under our control. The measures we take are designed to provide a level of security appropriate to the risk of processing your personal information.

6. Transfers of Personal Information

6.1 Marnix does not sell or transfer personal information to third parties for marketing purposes. However, in order to conduct our business, including marketing activities, we may need to share your personal information with other companies within the Marubeni Group, and/or third party service providers that process data on our behalf. When we do this, we will take steps to ensure that your personal information is protected, such as imposing contractual restrictions on the ability of the recipient to process your personal information and contractually requiring them to apply security measures to protect it.

6.2 Since the Marubeni Group operates globally, Marnix may want to transfer your personal information to other countries, including countries outside the European Economic Area (EEA). However, while it is in our control, Marnix always seeks to ensure that your personal information receives the same level of protection as it would had it stayed within the EEA, including seeking to ensure that it is kept secure and used only in accordance with our instructions and for the agreed purpose(s). The steps that we take in such circumstances may include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law, or other steps designed to adduce adequate safeguards of protection when your personal information is sent outside the EEA.

7. Retention

7.1 Your personal information will be retained securely by Marnix so that we can better manage your relationship with us. We retain personal information we collect from you where we have an ongoing legitimate business, legal or regulatory need to do so.

7.2 When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymise it or, if this is not possible (for example, because your personal

information has been stored in backup archives), we will securely store your personal information and isolate it from any further processing until deletion is possible.

8. Site Traffic Information and Cookies

- 8.1 Servers hosted by third party service providers (which may be located outside the EEA) automatically log data about your visit to our website based on your IP address. Marnix uses this information to see where the website is being used in the world and to ensure seamless coverage.
- 8.2 We use cookies and similar tracking technology (collectively, "Cookies") to gather and utilise personal information about you. For further information about the types of Cookies we use and why, and how you can control Cookies, please see our Cookie Notice www.marnix-europe.com/pages/cookie-policy

9. Your data protection rights

- 9.1 You have the following data protection rights:
- (a) If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the "Questions About Your Personal Information" heading, below.
 - (b) In addition, if you are a resident of the European Union, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the "Questions About Your Personal Information" heading, below.
 - (c) You have the right to **opt out of marketing communications** we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt out" link in the marketing e-mails we send you. To opt out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the "Questions About Your Personal Information" heading below.
 - (d) Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent at any time**. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
 - (e) You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for EU data protection authorities are available [here](#).)
- 9.2 We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

10. Questions About Your Personal Information

- 10.1 If you have any questions, comments or requests relating to this privacy statement or personal information we hold about you or if you would like to make a complaint about a possible breach of local privacy laws, please contact us by email at LDNMARNIX@marubeni.com or by post at the following address: Marnix Europe Ltd, 95 Gresham Street, London, EC2V 7AB.

11. Changes to this Privacy Statement

- 11.1 We review this privacy statement regularly and may modify it from time to time. We will place any updates on our webpage. By continuing to use our website after such changes have been made, you acknowledge and agree that you have read, understood and accept the changes. This privacy statement was last updated on 25 May 2018.

12. Hyperlinks and Embedded Functionality

- 12.1 Our website may contain links to content or other functionality provided by third parties which is outside our control and is not covered by our privacy statement. If you access other websites using links or use other embedded functionality provided by third parties, the operators of those websites may collect information from or about you which will be used by them in accordance with their privacy statements or policies, which may differ from ours. We encourage you to read the privacy information provided by the operators of those websites. We do not accept any responsibility or liability for those policies.