

# IG GROUP HOLDINGS PLC SHAREHOLDER PRIVACY NOTICE

# **PRIVACY NOTICE**

As part of our operation as a publically listed company we collect personal information from our shareholders.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal information supplied to us by you or a third party in connection with any holding of IG Group Holdings PLC shares. It also details your rights in respect of our processing of your personal information.

Our privacy notice will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy notice.

Please note that if you are an IG employee, a contractor to IG or a third party service provider, your personal information will be used in connection with your employment contract and workplace privacy notice, your contractual relationship or in accordance with our separate policies which are available by contacting us.

Any reference to 'us', 'our', 'we' or 'IG' in this privacy notice is a reference to IG Group Holdings PLC.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our shareholders.

# WHO ARE WE?

This privacy notice applies to the processing activities of the IG Group. The data controller in relation to shareholders is IG Group Holdings PLC, a company registered in England and Wales with company number 04677092 and whose registered office is Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA.

The data controllers within the IG Group may change from time to time in line with developments in the IG Group business.

If you are a shareholder, we may collect the following types of information about you:

- · name, address and contact details;
- · any other similar information.

We obtain this information in a number of ways through your transactions in shares in IG Group Holdings PLC. We may also collect this information about you from third parties.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers).

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

# MANAGEMENT OF PERSONAL INFORMATION

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees or agents who handle personal information to respect the confidentiality of personal information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

We have appointed a Security Information Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain supporting evidence and records of transactions with you and your relationship with us, for a period of five years after our business relationship with you has ended.

If we hold any personal information in the form of a deed, we will hold this deed in its complete form for a period of 12 years after our business relationship with you has ended.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be 5 years or 10 years after our business relationship with you has ended.

# TRANSFERS OUT OF THE EEA

We may transfer your personal information outside the European Economic Area to other IG Group companies as well as processors who are engaged on our behalf ('Transferees'). For example, currently we have other IG Group companies located in the USA, Singapore, Australia, Japan, China, India, the UAE, South Africa and Switzerland. To the extent we transfer your information outside the European Economic Area, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

In order to transfer personal information to third parties in territories that do not have a finding of adequacy by the applicable authority and regulations, we enter into agreements with the Transferees ensuring appropriate and suitable safeguards based on standard contractual terms adopted by the European Commission.

Where we make transfers to Transferees in the US, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements. If you would like a copy of such arrangements, please contact us using the contact details below.

As part of using your personal information for the purposes set out above, we may disclose your information to:

- other companies within the IG Group who provide financial and other back office services;
- service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services:
- courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you;
- anyone authorised by you.

Generally, we require that organisations outside the IG Group who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this privacy notice.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

# **HOW DO WE OBTAIN YOUR CONSENT?**

Where our use of your personal information requires your consent, such consent will be provided in accordance with any contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this privacy notice.

# PROTECTION OF PERSONAL DATA

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

We have appointed a Security Information Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.

You can reach our data protection officer as follows: dpo-europe@ig.com

# HOW DO WE STORE PERSONAL INFORMATION AND FOR HOW LONG?

We may use personal information for the following purposes:

To maintain various statutory registers relating to shareholders. We are required by law to keep accurate statutory registers relating to shareholders. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

# To investigate or settle enquiries or disputes

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

# To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

#### Corporate action

If we undergo a corporate action or part or all of our business is acquired by a third party, we may need to use your personal information in association with that restructure or acquisition. Such use may involve disclosing your details as part of a due diligence exercise. It is our legitimate interest to use your information in this way provided we comply with any legal obligation we have to you.

#### Security

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

# YOUR RIGHTS

The information about any rights that might be available to you in relation to the personal information we hold about you is set out below.

#### Access

If you ask us, we will confirm whether we are processing your personal information and, if so, provide you with a copy of that personal information (along with certain other details). If you require additional copies, we may need to charge a reasonable administration fee.

#### Rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### Erasure

You can ask us to delete or remove your personal information in certain circumstances such as where we no longer need it or you withdraw your consent (where applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations and subject to the section 'How do we store personal information and for how long'. If we have shared your personal information with others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### **Processing restrictions**

You can ask us to 'block' or suppress the processing of your personal information in certain circumstances such as where you contest the accuracy of that personal information or object to us processing it. It will not stop us from storing your personal information though. We will tell you before we lift any restriction. If we have shared your personal information with others, we will let them know about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

#### **Data Portability**

Under the General Data Protection Regulation (679/2016), you have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or ask us to transfer this to a third party of your choice.

#### Objection

You can ask us to stop processing your personal information, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal information except if we can demonstrate compelling legal grounds for the processing;
- · processing your personal information for direct marketing; or
- processing your personal information for research unless such processing is necessary for the performance of a task carried out in the public interest.

# THE PERSONAL INFORMATION WE HOLD ABOUT YOU

#### COOKIES

#### • WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

A cookie is a small piece of text stored on your computer or device when you visit a website or an app.

We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our website.

#### TECHNOLOGY IMPROVEMENTS

We are constantly striving to improve functionality on this site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of the change.

#### LINKS TO THIRD PARTY WEBSITES

Our websites or our apps may have links to external third party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

# WHAT IF YOU HAVE A COMPLAINT?

If you have a concern about any aspect of our privacy practices, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact us via one of the methods set below.

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint with our supervisory authority, the Information Commissioner's Office (ICO). You can find details about how to do this on the ICO website at https://ico.org.uk/concerns/ or by calling their helpline on 0303 123 1113.

# **HOW TO CONTACT US**

If you have any questions about this privacy notice or want to exercise your rights, please contact us by:

- phone on 0800 195 8009 (+44 20 7896 0011);
- · email at helpdesk.uk@ig.com; or
- writing at the address provided in the "Who are we?" section of this privacy notice.

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