

DATA PROTECTION NOTICE

Who are we?

Investec Private Finance Ireland Limited (“Investec Private Finance”) are a Retail Credit Firm regulated by the Central Bank of Ireland. Investec Private Finance has a registered address at The Harcourt Buildings, Harcourt Street, Dublin 2 and is registered at the Companies Registration Office, Dublin with company registration number 222489. Investec Bank plc is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority in the United Kingdom. Investec Bank plc is a limited company registered in England and Wales at Companies House with a registered address at 30 Gresham Street, London EC2V 7QP and registered company number 00489604.

At Investec Private Finance data privacy is taken seriously and we are committed to processing your personal data in accordance with EU data protection laws. This Data Protection Notice aims to give you information on how your personal data (i.e., information which directly or indirectly identifies you) are processed by Investec Private Finance (“we”, “us”, “our”). For the purposes of EU data protection laws, Investec Private Finance and Investec Bank plc are the joint data controllers.

Data That May Be Collected. We may collect certain personal data with respect to you, including, without limitation: (i) all personal data provided by you (or others in the case of joint applications) such as, contact details, national identity numbers, tax status, tax identification number (such as Public Personal Service Number) employment history, bank account details and financial circumstances and (ii) information we may collect from third parties such as background screening service providers and public sources such as the Companies Registration Office and (iii) we may monitor and/or record your telephone calls and electronic transactions. We will only collect and process your sensitive personal data (such as criminal data) with your explicit consent or where the processing is specifically authorised by a regulatory body or required by law.

Use of Personal Data. We will use your personal data for:

- (I) the provision of products and/or services requested by you;
- (II) the performance of our contract;
- (III) managing your accounts (including for debt collection and enforcement purposes);
- (IV) conducting credit searches and making credit decisions;
- (V) detecting and preventing fraud and money laundering;
- (VI) statistical analysis and assessment; .
- (VII) otherwise as necessary to comply with applicable laws, regulations and/or codes of practice; and
- (VIII) for marketing purposes (depending on your preferences).

We must have a legal basis to process your personal data for the above purposes. We will only process your personal data for the purposes set out above, to the extent necessary:

- In order to enter into a contract with you or to perform a contract that you have with us;

- In order to comply with our legal or regulatory obligations (for example, complying with reporting obligations to the Central Bank of Ireland or other applicable regulatory authorities);
- For our legitimate business interest in managing its business including legal, personnel, administrative and management purposes and for the prevention and detection of crime provided our interest are not overridden by your interests;
- With your consent or explicit consent to use of your data (including special categories of data) in a specific way. For example, your marketing preferences; and
- For the purposes of obtaining legal advice, or in connection with legal proceedings, or in connection with the exercise, defence or establishment of legal rights claims.

If you have criminal convictions or sanctions, we may process this information for the purposes of detecting and preventing fraud and money laundering. We will only process this information where we are authorised to do so under EU or Member State law.

If you do not provide us with your personal data we may not be able to process your application, provide you with the relevant facility, loan or services and comply with our legal obligations. We will tell you when we ask for information which is a contractual requirement or needed to comply with our legal obligations.

Disclosure to Certain Third Parties. We may disclose certain personal data: (i) to other affiliates in the Investec Group; (ii) to our professional advisors, receivers and administrators (where applicable), and service providers (including, information technology systems providers); (iii) to your professional advisors and any other organisations party to a financing deal authorised by you to receive your personal data; (iv) to courts, governmental and non-governmental regulators and ombudsmen; (v) to fraud prevention agencies and law enforcement agencies; (vi) to any third party that acquires, or is interested in acquiring, all or part of our assets or shares, or that succeeds us in carrying on all or a part of its business, whether by merger, acquisition, reorganisation or otherwise; (vii) as otherwise required or permitted by law. Where you have been introduced to us by an introducer (e.g. an independent financial adviser) we will inform the introducer of the outcome of the enquiry including whether we have agreed to provide you with the relevant product or service.

Transfer of Personal Data Outside the European Economic Area (“EEA”). We may transfer your personal data to recipients (including affiliates in the Investec Group) located in countries outside of the EEA, including in South Africa, which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all necessary steps to protect your personal data in accordance with applicable EU data privacy laws. To obtain more information concerning these safeguards see contact our Compliance Team using the contact details below.

Your Rights. Under applicable EU data privacy laws, you may have the following rights:

- Right of access a copy of your personal data held by us;
- Right to rectification or to have inaccuracies corrected;
- Right to be forgotten or to erasure;
- Right to restrict the processing of your personal data;
- Right to object the processing of your personal data;
- Right to withdraw your consent at any time (the withdrawal of your consent will not invalidate any processing we carried out prior to their withdrawal and based on your consent);

- Right to data portability (i.e. to request the transfer of personal data from one data controller to another).

If you wish to obtain more information about or exercise any of these rights you should contact your relationship manager in the first instance or the Compliance department using the contact details below. You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority. The details of the Irish Data Protection Commission are as below 21 Fitzwilliam Square South, Dublin 2, D02 RD28, Ireland. Phone +353 (578 684 800)/ +353 761 104 800 or visit <https://www.dataprotection.ie/en/contact/how-contact-us>

Marketing. We may contact you periodically to provide information regarding events, products, services and content that may be of interest to you and to invite you to participate in market research. If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent. If you wish to stop receiving marketing or market research communications from Investec Private Finance you can click on the unsubscribe link in the marketing communication , liaise with your Relationship Manager or contact the Compliance department as described below.

Security and Data Retention. We will take steps to protect your personal data against loss or theft, as well as from unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held. Data will be stored for as long as required to satisfy the purpose for which the data was collected and used, unless a longer period is necessary for our legal, accounting or reporting obligations or for the exercise or defence of legal claims. Subject at all times to applicable laws, we will usually retain your personal data for a period up to 7 years from the end of the relationship.

Enquiries, Requests or Concerns. All enquiries, requests or concerns regarding this notice or relating to the processing of personal data, should be addressed to your relationship manager in the first instance or can be sent to the Compliance Department at Investec Private Finance Harcourt Building, Harcourt Street, Dublin 2.

Updates to this notice. We may make amendments to this notice from time to time and you will find our most up-to-date notice on our website at www.investec.ie. Any substantial changes to this notice will be made available on our website.

