

## Notification regarding the processing of personal data for direct marketing purposes

The present Notification regarding the Processing of Personal Data aims to describe the collection, use and protection of your personal data which are being processed by EFG Harris Allday, an investment management division of EFG Private Bank Limited (Park House, 116 Park Street, London, England, W1K 6AP) (“EFGHA” or “we”) for direct marketing purposes.

### 1. Types of personal data and purpose of their processing by EFGHA

EFGHA collects and processes in general your personal data for direct marketing purposes, including dispatching of newsletters. By processing your personal data, we may contact you via post, email, calls or text messages. The personal data that we collect for the above purposes include general identification and contact details, such as your name and surname, your address, your email address and your phone number.

### 2. Legal basis for the processing of your personal data

We collect, use and disclose your personal data if: (a) you have given your consent to the processing; or (b) where applicable, the processing of your personal data is necessary for the purposes of the legitimate interests that EFGHA pursues, which prevail over your interest or your legitimate rights and freedoms that impose the protection of your personal data. Moreover, by law and without your consent being required, we are entitled to use: (a) your personal data which have been obtained through publicly available sources in order to contact you via telephone for the above processing purpose, once we have ensured that you have not objected to our calls and that your phone number is not registered on the Telephone Preference Service (TPS) or the Corporate Telephone Preference Services (CTPS); or (b) your email address, which was legally obtained, in the context of any services or other transaction that you had with EFGHA, for the fulfilment of the above processing purpose of your personal data, provided that you didn't refuse to such communication (e.g., choose the relevant opt-out box) at the time that EFGHA first collected your data.

### 3. Transfer of your personal data

We do not share your personal data with third parties, apart from: (a) third companies which act on EFGHA's behalf, in their capacity as processors and in the context of a specific agreement relating to confidentiality and protection of the personal data that we have concluded with these companies; and (b) third parties to which EFGHA is required to transfer your personal data on the basis of the applicable legislation. Personal data shall not be transmitted outside the European Economic Area (EEA) and the United Kingdom (UK).

### 4. Your rights

In respect of your personal data, you have the following rights: (a) the right of access and correction or erasure of your personal data or restriction of their processing or objection to their processing, as well as the right to portability of the personal data; (b) the right to lodge a complaint to the Information Commissioner's Office (ICO); and (c) the right to withdraw your

consent to the processing of your data for the purpose of this Notification at any time without affecting the lawfulness of processing based on consent before its withdrawal.

#### **5. Retention period of your personal data**

Your personal data will be retained for as long as it is permitted or required by the applicable legislation. In any case, we cease the processing of your personal data for direct marketing purposes when you inform us accordingly (e.g., by withdrawing your relevant consent).

#### **6. Contact us**

If you have any question relating to this Notification or you would like to exercise any of your rights in relation to the protection of your personal data, you may contact the Data Protection Officer (DPO) of EFGHA at the mailing address mentioned above or at [dpo@efgha.com](mailto:dpo@efgha.com).