



## **PRIVACY POLICY**

*INDEFI*

**Last updated 21 October 2019**

At INDEFI GROUP we take your privacy seriously and we are committed to protecting it.

This policy explains when and why we collect personal information about individuals, how this information is used, with whom we share that information and the rights they have over it.

This policy may change from time to time so please check this page occasionally to ensure that you are happy with any changes. This policy was last updated on the date set out at the start of this page. Please see further the section Changes to this policy below.

### **WHO WE ARE**

INDEFI is a strategy advisor for the asset management industry. Whenever providing personal information or interacting with one of our consultants, INDEFI GROUP is considered as the 'data controller' in relation to the processing activities described below. A 'data controller' is an organisation that decides why and how your personal information is processed and is responsible for such processing.

### **HOW WE COLLECT YOUR PERSONAL INFORMATION**

We collect personal information from you in the following ways:

#### **Personal information you give to us:**

This is information about you that you give to us when:

- corresponding with us by phone, email or in another way,
- interacting with us at events;
- providing us with your business cards;
- we provide services to our client for whom you work; and
- we receive services from our supplier for whom you work;

This information is provided by you entirely voluntarily and includes personal information that you provide to us in the course of our activities. If, at our request, you participate in any market research, we will collect your personal information in such circumstances as well. The information you give to us may include your name, address, email address and phone number, enquiry details and other business and contact information, and may include records of any correspondence and responses to any market research.

If you do not share this information with us, you may be unable to receive our regular news, communicate with us effectively or allow us to comply with our own obligations if you work for an organisation that is our client.



**Personal information we collect about you:**

We may automatically collect the following information during your visits to our Website: traffic data, location data, device data and other communication data, and details of the resources you access. We also automatically collect technical information, including anonymous data collected by the hosting server for statistical purposes, the Internet protocol (IP) address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform. We may also collect any personal information which you allow to be shared that is part of your public profile on third party social networks.

**Personal information we may receive from other sources:**

We obtain certain personal information about you from other sources (including those outside of our business) which may include our suppliers and our clients. The sources that may send to us personal information about you are as follows:

Source of personal information	The categories of personal information (as described in the section below) that we obtain about you from this source
Our suppliers	Biographical, Contact, Correspondence, Identity, Employment, Fraud
Our clients	Contact, Correspondence, Identity

**CATEGORIES OF PERSONAL INFORMATION WE PROCESS ABOUT YOU**

We process different types of personal information about you. To make it easier to understand the information that we use about you, we have categorised this information in the table below and provided a short explanation of the type of information each category covers.

Category of personal information	Description
Biographical	your life experiences
Contact	information which can be used to address, send or otherwise communicate a message to you
Identity	information contained in a formal identification document or social security or other unique reference relating to you
Employment	your previous, current or future employment details including the scope of your professional activities
Legal	information relating to legal claims made by or against you or the organisation for whom you work or the claims process



Correspondence	information contained in our correspondence or other communications with you or your work colleagues
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## HOW WE USE YOUR PERSONAL INFORMATION

The purposes for which we use your personal information and the legal basis under data protection laws on which we rely to do this are explained below.

### Where you have provided consent

We may use and process your personal information where you have consented for us to do so. If you work for an unincorporated business or are a candidate interested in our recruitment efforts, we will contact you via email or post with marketing information about our services if you (i) register for an account with us online and indicate that you would like to receive such marketing from us; (ii) sign up to insights or news (via email or direct contact) or other medium where available; or (iii) when you refresh your marketing preferences and opt-in when responding to a request from us to do so.

You may withdraw your consent for us to use your information in any of these ways at any time. Please see [Withdrawing your consent](#) for further details.

### Where processing is necessary for us to pursue our legitimate interests

We may use and process your personal information where it is necessary for us to pursue our **legitimate interests** as a business, for the following purposes:

#### Processing necessary for us to promote our services and our business

- To contact you by email or by telephone with marketing information about our services and interesting events we may invite you to. We will use your personal information to tailor or personalise the marketing communications you receive to make them relevant to you;

#### Processing necessary for us to respond to changing market conditions and our clients' needs

- for market research in order to improve the services that we deliver;
- to notify you about changes to our services and our business;

#### Processing necessary to manage and administer our prospective recruits

- to keep in touch with our prospective recruitment candidates through non-promotional mailings, events and surveys;
- to maintain and share marketing and career development contacts with prospective recruitment candidates;

#### Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

- to enable us to make payments to contractors and freelancers who provide services to us;
- for the prevention of fraud and other criminal activities;
- to verify the accuracy of information we hold about you;
- for network and information security purposes in order for us to take steps to protect your information against loss or damage, theft or unauthorised access;



- to comply with a request from you in connection with the exercise of your rights (for example where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request);
- for the purposes of a corporate restructure or reorganisation or sale of our business or assets;
- for efficiency, accuracy or other improvements of our databases and systems e.g. by combining systems or consolidating records we hold about you;
- to enforce or protect our contractual or other legal rights or to bring or defend legal proceedings; and
- for general administration including managing your queries, complaints, or claims, to send service messages and to provide you with important information about our business.

**Where required to comply with our legal obligations**

We will use your personal information to comply with our legal obligations:

- to assist any public authority or criminal investigatory body, where we are under a legal obligation to do so;
- to identify you when you contact us;
- to verify the accuracy of data we hold about you; and
- to respond to and resolve your complaints in relation to our services.

**OTHERS WHO MAY RECEIVE OR HAVE ACCESS TO YOUR PERSONAL INFORMATION**

**Our suppliers, service providers and other recipients**

We may share your information with our third-party service providers, agents, subcontractors and other organisations (as listed below) for the purposes of providing services to us or directly to you on our behalf.

Recipient / relationship to us	Industry sector (& sub-sector)
Accountancy services	Professional services (accountancy)
Banks, payment processors and financial services providers	Financial (banking)
Cloud storage providers	IT (cloud services)
Financial auditing services	Audit (financial)
Government tax administration offices	Government (tax)
Data deletion and archiving providers	IT (data lifecycle management)



IT support service providers	IT (support and maintenance)
Legal advisers	Professional services (legal services)
On-site security access control services	Security (on-site)

The recipients mentioned above are in Europe.

When we use third party service providers, we only disclose to them any personal information that is necessary for them to provide their service and we have a contract in place that requires them to keep your information secure and not to use it other than in accordance with our specific instructions.

When we share your personal information to third parties that are controllers of that information, they may disclose or transfer it to other organisations in accordance with their data protection policies. This does not affect any of your data subject rights as detailed below. In particular, where you ask us to rectify, erase or restrict the processing of your information, we take reasonable steps to pass this request on to any such third parties with whom we have shared your personal information.

#### **Other ways we may share your personal information**

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or reorganisation. We may also transfer your personal information if we are under a duty to disclose or share it in order to comply with any legal obligation, to detect or report a crime, to enforce or apply the terms of our contracts or to protect the rights, property or safety of our visitors and customers. We will always take steps with the aim of ensuring that your privacy rights continue to be protected.

#### **WHERE WE STORE YOUR PERSONAL INFORMATION**

Keeping your personal data safe and secure is at the centre of how we conduct our business. We use appropriate technical, organisational and administrative security measures to protect any information we hold from loss, misuse, and unauthorized access, disclosure, alteration and destruction.

All data collected by INDEFI are stored on our servers based in France or on subcontractors' servers, based in Europe.

#### **HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR**

We do not retain personal information in an identifiable format for longer than is necessary.

If we collect your personal information, the length of time we retain it is determined by a number of factors including the purpose for which we use that information and our obligations under other laws. We determine the period of retention of your personal information based on the following criteria:

- Retention in case of queries. We will retain your personal information in case of queries from you, including on behalf of an organisation for whom you work;



- Retention in case of claims. We will retain certain of your personal information for the period in which you or a third party might bring claims against us;
- Retention in accordance with legal and regulatory requirements. We will carefully consider whether we need to retain your personal information after the period described above in case of a legal or regulatory requirement

The exceptions to the above are where:

- you exercise your right to require us to retain your personal information for a period longer than our stated retention period (see further Erasing your personal information or restricting its processing);
- you exercise your right to have the information erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law (see further Erasing your personal information or restricting its processing below);
- we bring or defend a legal claim or other proceedings during the period we retain your personal information, in which case we will retain your personal information until those proceedings have concluded and no further appeals are possible; or
- in limited cases, existing or future law or a court or regulator requires us to keep your personal information for a longer or shorter period.

## **SECURITY AND LINKS TO OTHER SITES**

We implement appropriate technical and organisational measures to keep your personal information safe and secure.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our Websites and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access.

Our Websites may contain links to other websites run by other organisations. This policy does not apply to those other websites, so we encourage you to read their privacy statements. We cannot be responsible for the privacy policies and practices of other websites even if you access them using links that we provide. In addition, if you linked to our Websites from a third-party website, we cannot be responsible for the privacy policies and practices of the owners and operators of that third-party website and recommend that you check the policy of that third party website.

## **COOKIES**

Like many other websites, our Websites use cookies (including Google Analytics cookies) to obtain an overall view of visitor habits and visitor volumes to our website. 'Cookies' are small pieces of information sent to your computer or device and stored on its hard drive to allow our websites to recognise you when you visit.

It is possible to switch off cookies by setting your browser preferences. For more information on how we use cookies and how to switch them off on your device, please visit our Cookies Policy.

## **AUTOMATED DECISION MAKING**

We do not envisage that any decisions that have a legal or significant effect on you will be taken about you using purely automated means, however we will update this policy and inform you if this position changes.



## YOUR RIGHTS

You have a number of rights in relation to your personal information under data protection law. In relation to certain rights, we may ask you for information to confirm your identity and, where applicable, to help us to search for your personal information. Except in rare cases, we will respond to you within one month from either the date that we have confirmed your identity or, where we do not need to do this because we already have this information, from the date we received your request.

- **Accessing your personal information**

You have the right to ask for a copy of the information that we hold about you by emailing or writing to us at the address at the end of this policy. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

- **Correcting and updating your personal information**

The accuracy of your information is important to us and we are working on ways to make it easier for you to review and correct the information that we hold about you.

In the meantime, if you change your name or address/email address, or you discover that any of the other information we hold is inaccurate or out of date, please let us know by contacting us in any of the details described at the end of this policy.

- **Withdrawing your consent**

Where we rely on your consent as the legal basis for processing your personal information, as set out under How we use your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this policy. If you would like to withdraw your consent to receiving any direct marketing to which you previously opted-in, you can do so by sending an e-mail using the details at the end of this policy. If you withdraw your consent, our use of your personal information before you withdraw is still lawful.

- **Objecting to our use of your personal information**

Where we rely on your legitimate business interests as the legal basis for processing your personal information for any purpose(s), as out under How we use your personal information, you may object to us using your personal information for these purposes by emailing or writing to us at the address at the end of this policy. Except for the purposes for which we are sure we can continue to process your personal information, we will temporarily stop processing your personal information in line with your objection until we have investigated the matter. If we agree that your objection is justified in accordance with your rights under data protection laws, we will permanently stop using your data for those purposes. Otherwise we will provide you with our justification as to why we need to continue using your data. You may object to us using your personal information for direct marketing purposes and we will automatically comply with your request. If you would like to do so, please contact us at [dataprivacy@indefi.com](mailto:dataprivacy@indefi.com).

- **Erasing your personal information or restricting its processing**

In certain circumstances, you may ask for your personal information to be removed from our systems by emailing or writing to us at the address at the end of this policy. Unless there is a reason that the law allows us to use your personal information for longer, we will make reasonable efforts to comply with your request. You may also ask us to restrict processing your personal information where you believe it is unlawful for us to continue processing, you have objected to its use and our investigation is pending or you require us to keep it in connection with legal proceedings. In these situations, we may only process your personal information



whilst its processing is restricted if we have your consent or are legally permitted to do so, for example for storage purposes, to protect the rights of another individual or company or in connection with legal proceedings.

- **Transferring your personal information in a structured data file ('data portability')**

Where we rely on your consent as the legal basis for processing your personal information or need to process it in connection with your contract, as set out under How we use your personal information, you may ask us to provide you with a copy of that information in a structured data file. We will provide this to you electronically in a structured, commonly used and machine-readable form, such as a CSV file.

You can ask us to send your personal information directly to another service provider, and we will do so if this is technically possible. We may not provide you with a copy of your personal information if this concerns other individuals or we have another lawful reason to withhold that information.

## **CHANGES TO THIS POLICY**

We may review this policy from time to time and any changes will be notified to you by email, where possible, or otherwise by posting an updated version of this policy to our Websites. Any changes will take effect 7 days after the date of our email or date of posting (as applicable), unless we state otherwise. We recommend you regularly check for changes and review all updates to this policy.

## **CONTACT US**

Please direct any queries about this policy or about the way we process your personal information to your usual point of contact at INDEFI or at [dataprivacy@indefi.com](mailto:dataprivacy@indefi.com).

If you wish to write to us, please write to INDEFI GROUP, 30 rue la Boétie, 75008 Paris.

Our email address for data protection queries is [dataprivacy@indefi.com](mailto:dataprivacy@indefi.com).

If you would prefer to speak to us by phone, please call (+)331 56 88 34 70.

## **INDEFI GROUP**

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