

Effective May 25, 2018, the European Union adopted a regulation known as the General Data Protection Regulation (GDPR).

As a resident of the European Union, you are protected by the provisions of the GDPR. As an entity known as a Data Controller, the issuer of stock is subject to provisions of the GDPR regarding your personal data and information.

Please take time to review the following Privacy Notice, which sets out your rights under the GDPR. If you have any questions, please contact:

EQ Data Protection Officer
90 Park Avenue, 25th Floor
New York, NY 10016
EQUS.compliance@equiniti.com.

Securities Issuer Fair Processing Notice (FPN)

We understand how important your personal data is and are committed to protecting and respecting your privacy.

'Personal Data' means any information relating to or which identifies you. This can include items such as your name, address, phone number, identification numbers (such as an account number or your national insurance number), location data or online identifiers. Personal data can be held electronically or in certain paper records.

The General Data Protection Regulation (GDPR) regulates the processing of personal data for individuals residing within the European Union. The GDPR seeks to protect your rights to your personal data by setting out, amongst other things, the conditions under which the processing of personal data is lawful, the rights of data subjects and the standards that organizations that handle personal data must adopt. This Fair Processing Notice is issued in compliance with GDPR and seeks to explain:

1. Who we are;
2. Products and services covered by this Privacy Notice;
3. How we collect your personal data;
4. Why we collect your personal data;
5. How long we hold the personal data ;
6. The conditions under which we can share it with others;
7. Overseas processing;
8. How we keep your personal data secure;
9. Your personal data **rights** and how to exercise them;
10. Useful information; and
11. Any further questions.

1. Who we are

We are the issuer of securities you own. Our transfer agent is Equiniti Trust Company, which is part of the Equiniti Group of Companies, and is a transfer agent in the United States. Equiniti Trust Company's registered address is 90 Park Avenue, 25th Floor, New York, NY 10016, and their Operations Center is located at 1110 Centre Pointe Curve, Mendota Heights, MN 55120.

Equiniti Trust Company is a **'Data Processor'** acting on behalf of a securities issuer. The securities issuer is a **'Data Controller.'** **The Data Controller** is responsible for deciding how and why Equiniti Trust Company holds and uses personal data about you.

In this FPN, 'we', 'us' and 'our' will always mean the issuer, as Data Controller, or Equiniti Trust Company, as Data Processor.

PROFILING

Equiniti Trust Company, as part of required activities under United States law, undertakes financial crime checks of all shareholders on their database.

2. Products and services covered by this FPN

This notice applies to all of the following Equiniti Trust Company products and services used by us:

1. Shareholder registry;
2. Direct Stock Purchase Plan transactions;
3. Dividend Reinvestment Plan transactions;
4. Dividend payments
5. Employee Stock Option Plan transactions;
6. Employee Stock Purchase Plan transactions

3. How Equiniti Trust Company collects your personal data

As part of the recordkeeping maintained on behalf of issuers, Equiniti Trust Company obtains and stores personal identifying information, including names, addresses, and tax identification numbers of shareholders. Additionally, Equiniti Trust Company may also obtain and store bank account information to enable it to process transactions in accordance with shareholder instructions.

Equiniti Trust Company processes personal data as part of standard data collection and as part of correspondence or complaint information.

We and Equiniti Trust Company may collect and process the following personal data about you:

Information you provide to us

- By filling in forms on our website(s);
- By corresponding with us by phone, e-mail, live-chat or otherwise;
- Application/registration forms/identification documentation;
- When you report any problem or complaints with our website, products and services.

Information we collect about you when you use our services

- Information about how you logged on and off our website(s), including your IP address, information about your visit, your browsing history, and how you use our website. This will include the capture of your location information – please see our Cookie Policy for further information on this;
- Information on what you view, click on and access in and through our marketing emails and text messages. This may include the geographic location of the device you have used – please see our Cookie Policy for further information on this;
- Images and voice recordings of your communications with us for quality control, training, security and regulatory purposes, but may also capture your location, i.e. use of home landline number
- Information about the transactions and investments you make while using our products and services, including financial data
- If you contact us via social media, we may collect details from your social media account.

Information we receive from third parties

- As part of our identity and financial crime checking procedures with credit reference agencies, fraud detection agencies and registration or stockbroking industry exchanges;
- From third parties when you have instructed or agreed for them to pass information to us, such as
 - Your employer if you are using our services following an employee purchase plan;
 - Your broker, agent, Trustee or Investment Company

- From online advertising networks (for example Google) through whom we place advertisements. The information we obtain varies from network to network. It often summarises the actions of lots of people and so does not enable us to identify you individually. It relates to what you view, click on, and access through websites in their network, including the subject matter of the website you started at and where you subsequently go. It might also include their analysis of your behaviour across the wider internet and a profile of you. If you are unhappy about this happening you should look out for 'settings' and 'Do Not Track' options in online advertisements and in the privacy and cookies functionality on your devices and consider changing your settings to block third party cookies in particular. We do not control the information on you that such networks obtain, or the technology they use to do so.

Keeping your personal data up to date

The personal data we hold may include your name, mailing and home address, email address and phone number, financial information and for some accounts and transactions, additional information about you such as your tax identification number and nationality to enable us to provide you with our products and services.

It is important to us that the personal data we hold about you remains accurate and up to date at all times, but we need your help in doing this. Please ensure that you review the information held about you regularly and let us know as soon as anything needs updating or correcting.

Other people's personal data

The information you give us in your application form or other related documents, or that we collect through your use of our services, may contain your or another person's personal data. If you provide us with information about another person, you confirm that they have appointed you to act for them, they consent to you providing their personal data to us and any processing of their personal data and that you have informed them of our identity and the purpose for which their personal data will be processed – as set out in this Privacy Notice.

4. Why we collect your personal data

In the table below we demonstrate why and how we use your personal data as well as providing the legal reasons which we rely upon.

Under Data Protection legislation we must always have a legal reason for processing your personal data. One of the legal reasons is when we use your personal data for our legitimate interests, this is usually when we have a business reason, however, we must always ensure that we take your interests into consideration too, and ensure that the use is fairly balanced. We tell you below when we rely on legitimate interests and what our legitimate interests are.

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
<p>Provision of Financial services, including the administration and management of customer records</p>	<p>To manage and operate your account with us to facilitate the provision of services, this includes retaining records of your instructions and telephone calls and keeping your account records up to date.</p> <p>To notify you about changes to our service and to send you service emails relating to your account.</p> <p>To complete any transaction that you instruct us to undertake, and any legal obligations we have in relation to the transactions.</p> <p>To keep our websites and portals secure and permit you safe access to our services.</p> <p>To provide you with transaction records/ confirmation notices and statements as required by the service.</p> <p>To respond to any complaints and / or data rights that you invoke.</p> <ul style="list-style-type: none"> ○ To notify you about changes to our service and to send you service emails relating to your account. ○ Processing our fees, charges, and any interest due on your accounts. Enforcing or obtaining settlement of debts owed to us or in relation to investments made on your behalf. ○ Enforcing or obtaining a settlement of debts owed to us or in relation to investments made on your behalf. 	<ul style="list-style-type: none"> ○ As part of contract preparations and obligations between us and you. ○ With your consent. ○ To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations. ○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. ● To meet our regulatory requirements ● To identify when you are no longer able to use the product or service in accordance with the terms and conditions; or to restrict your account to meet product restrictions

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
Assessment and collection of taxes	<p>To deduct the relevant tax and duties (such as stamp duty, dividend tax and income tax) and submit returns to the relevant regulatory authorities.</p> <p>For some products, this is achieved through our liaison with your employer.</p>	<ul style="list-style-type: none"> ○ As part of contract preparations and obligations between us and you. ○ With your consent. ○ To comply with legal requirements placed upon us. ○ To meet our regulatory requirements. <p>The performance of a contract between you and taking steps, at your request, to enter into such a contract and/or us. To comply with a legal obligation placed upon the Data Controllers, namely tax collection and payment</p>
Crime prevention	<p>Financial crime and money laundering: We analyse your personal data for financial crime, money laundering and fraud risk purposes in accordance with United States regulations which are placed upon us. This can include:</p> <ul style="list-style-type: none"> ○ Confirming your identity (through the use of Credit Reference agencies – see above). ○ Verifying your bank details. ○ Using fraud prevention agencies. We study and learn about how you use our products and services and use this information to better detect fraud or unusual activities. We do this with fraud prevention agencies. ○ Analysing our databases, investigating, detecting and report financial crimes as well as taking measures to prevent financial crime. ○ Developing and improving our financial crime controls. ○ Managing financial risks both to us and to you. 	<ul style="list-style-type: none"> ○ As part of contract preparations and obligations between us and you. ○ With your consent. <p>To comply with a legal obligation placed upon the Data Controllers, namely verifying that shareholders are not subject to sanctions by the United States Office of Foreign Assets Control or other United States government authorities.</p> <ul style="list-style-type: none"> ○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> ● Keeping our records up to date. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. ● To meet our regulatory requirements.

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
<p>Improving our products and services</p>	<ul style="list-style-type: none"> ○ To identify service improvements such as when troubleshooting, undertaking data analysis, testing new products, using your personal data for research, statistical and survey purposes. ○ To ensure that content from our websites are presented in the most effective manner for you and for your device. ○ To develop and manage our products, brands and services and to calculate how we should structure any fees and charges. ○ How we manage and work with other companies in the delivery of your products and services. ○ To study how you and our other customers use our products and services. <p>To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which can be based on your activity on our website(s) or the website of another Equiniti Company or third parties' websites. We can do this ourselves or appoint an agency to do this on our behalf.</p>	<ul style="list-style-type: none"> ○ As part of contract preparations and obligations between us and you. ○ With your consent. ○ To comply with legal requirements placed upon us. ○ To meet our regulatory requirements ○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. <p>Some of this information will be gathered by cookies that you have consented can access your computer.</p>
<p>Profiling</p>	<p><u>Understanding our customers:</u> We can place you into groups of customers with similar interests, account patterns and preferences. These are called customer segments. We can also use a customer insight technique which analyses past observations to predict future behaviour. This is called propensity modelling. These activities are used to predict how we can best deliver our service to you as well as tailor our product or service offerings and contact you efficiently and effectively with information that is relevant to you.</p> <p>You can ask us to stop profiling at any time – see section 9 - Your Rights – but this may impact our ability to provide services to you.</p>	<ul style="list-style-type: none"> ○ Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> ● Keeping our records up to date. ● Defining types of customers for new products and services. ● Seeking your consent when we need it to contact you. ● Operating efficiently. ● Enabling and monitoring your use of our website and services. ● To meet our regulatory requirements.

Type of processing	Purpose of the processing	Lawful basis for the processing of personal data
<p>Automated decision making</p>	<p>We use personal data to help us make automated decisions based on the personal data that we hold about you, or are permitted to collect from others. Common examples of when we do this are noted below:</p> <ul style="list-style-type: none"> o <u>Account Opening</u>: We are required to check that you meet the requirements of the account you have selected, to do this we can use, and validate, personal data about you such as your age, residency, nationality and financial position. o <u>Account Pricing</u>: We can analyse the transactions you have undertaken in a predetermined period to calculate what we charge for some products and services. o <u>Credit checks</u>: We use credit reference agencies for account purposes including confirming your identity or implementing trading limits. The decisions we make are based on the information you have supplied, that we already hold and from the credit reference agencies who separately hold information about you, or from policy decisions taken by Banks, card and payment processing centres. This includes rejecting trades if they fall outside of your agreed trading limit. To resolve any issues arising you may have to speak to these agencies directly. <p>You can ask to have one of our staff to review any automated decision about you at any time – see section 9 - Your Rights.</p>	<ul style="list-style-type: none"> o As part of contract preparations and obligations between us and you. o With your consent. o To comply with legal requirements placed upon us, such as the Financial Conduct Authority and Financial Crime regulations. o Our legitimate interests, such as the proper administration of our service and business, for example: <ul style="list-style-type: none"> • Keeping our records up to date. • Defining types of customers for new products and services. • Seeking your consent when we need it to contact you. • Operating efficiently. • Enabling and monitoring your use of our website and services. • To meet our regulatory requirements.

If you choose not to give personal information

We need to collect personal information required by law or under the terms of a contract we have with you. If you choose not to give us the personal data we need it can mean that we have to cancel or decline a product or service that you request or have with us. So that you know what information is optional, we make it clear at the time we collect your personal data.

5. How long we hold your personal data for

Personal data will not be retained for longer than necessary for us to achieve the purpose for which we obtained your personal data. We will then either securely delete it or anonymise it so that it cannot be linked back to you. We review our retention periods for personal data on a regular basis.

All records are maintained in accordance with Rule 17Ad-7, promulgated by the United States Securities and Exchange Commission.

We can keep your data for longer than these requirements if we cannot delete it for legal, regulatory or technical reasons. We can also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

For full details of the retention policies of our transfer agent, please contact the Risk and Compliance Officer of Equiniti Trust Company, at EQUUS.compliance@equiniti.com.

6. The conditions under which we may share your personal data with others

The personal data we hold about you is confidential, and we will only share your personal data to enable us to deliver our product(s) or service(s), examples are as follows:

- At your request, or with your consent or the consent of any party linked to your product or service;
- Other Equiniti Group entities who help us deliver our products and services, such as Equiniti India Private Limited
- Non-Equiniti entities, in connection with running accounts and services for you, including:
 - Banks and other payment service providers to make and receive payments
 - Printers in order to supply you with documentation and statements
 - Insurance companies - where we need to provide details of your account when we or Equiniti Trust Company make a claim.
 - Stockbrokers and market makers who execute transactions we make on your behalf
 - Service suppliers to facilitate email, IT and administration services
 - Our professional advisors, for example, our lawyers and technology consultants, when they need it to provide advice to us
 - Your employer or agent(s), in accordance with any specific instructions you provide to us or where it is required for the employer to report the information for tax purposes.
 - Credit reference agencies and our fraud detection agencies as part of our identification procedures, for example, Experian and TraceSmart
 - Your Official Receiver or appointed insolvency practitioner if we receive notice of your insolvency, bankruptcy or insolvency proceedings / arrangement

We will only transfer your personal information to trusted third parties who provide sufficient security guarantees and who demonstrate a commitment to compliance with applicable law and this policy. Where third parties are processing personal information on our behalf, they will be required to agree, by contractual means, to process the personal information in accordance with the applicable law. This contract will stipulate, amongst other things, that the third party and its representatives shall act only on our instructions, or as permitted by law.

We are also required share your personal data with external third parties as follows (but not limited to):

- Regulators and supervisory authorities e.g. the United States Internal Revenue Service, domestic or foreign tax authority, the United States Securities and Exchange Commission, state and federal courts (the courts), tax advisors, the Depository Trust and Clearing Corporation or the operator of any market on which you may hold investments, as part of our legal obligations in providing the products / services

- Where the law requires or permits disclosure, or there is a duty to the public to reveal it
- When we need to defend or exercise our legal rights or those of a third party
- Debt collecting, debt chasing or another agent for enforcing payment of monies owed to us
- Efforts to trace you if we lose contact with you, e.g. to reunite you with your assets
- State governmental agencies, when contact with you is lost
- Police and other law enforcement agencies for the prevention and detection of crime and where a valid permission is applicable
- As a result of a court order or other regulatory instruction
- Our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments
- We may transfer your personal data 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 reorganization. At all times, we take steps to ensure your privacy rights continue to be protected as per this FPN.
- For individuals subject to personal account dealing regulations – when we are advised by you or your employer that personal account dealing reporting requirements are in place, we will notify your employer of relevant trades and transactions on your account.

7. Overseas Processing

Personal data will be shared with members of the Equiniti Group outside of the United States, including Equiniti Limited, which is based in the United Kingdom, and Equiniti India Private Limited, which is based in India, for the purposes described in this policy.

Please note that information protection laws do vary from country to country. In particular, the law of the country in which you are a resident or domiciled may offer a higher standard of protection than the laws in the United Kingdom and/or those other countries in which we store and use the personal data we collect. Our transfer of personal data to other countries could result in that personal data being available to governments and other authorities in those countries under their laws.

By using our Service, you agree to this international transfer, storing and processing.

8. How we keep your personal data secure

We understand how important your personal data is to you and we take appropriate steps to ensure that it remains secure. We safeguard your personal data across all our computer systems, networks, websites, and offices as much as possible through appropriate procedures and technical security measures (including strict encryption, anonymization and archiving techniques). The Information Security policies at Equiniti Trust Company are aligned to ISO27001, which is an internationally recognised security standard.

We also use secure ways of communicating with you such as when collecting your personal data or providing your account information:

- online through the use of “https” and other security and encryption protocols. This is indicated by a lock icon on the bottom of the web browser, or the address will include the letters https in the top left-hand corner;
- by telephone we will always ask you security questions to confirm your identity before we discuss matters relating to your account(s).

Where we have given you (or where you have chosen) a password or unique identifier (PIN) which enables you to access certain parts of our websites, you are responsible for keeping this password / PIN confidential, along with any username. We will never ask for your full password or PIN, and **you must not divulge your full password to us or anyone else**. We recommend that any password or PIN you set is not easily guessable, and changed frequently.

Because we cannot guarantee the confidentiality of personal data sent on the internet, you should never send your login details via email.

Security concerns

If you ever receive a communication from us by post, email or by phone that you are concerned may not be genuine, please contact us using the contact details above. You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details. If you have any concerns about the security of your own personal computers and mobile devices, we suggest you read the advice of Get Safe Online, which can be accessed at www.getsafeonline.org.

9. Your personal data rights and how to exercise them

You have rights in respect of the personal data that we hold about you. They include the right to request a copy of the information that we hold about you, to know about any automated decisions that are made about you and to change your marketing preferences at any time. Details about all of your rights are provided below.

Some of these rights are conditional and depend upon why we are processing your personal data. This means that we are not always able to respond to your request in the way that you want. For example:

- If you ask us to erase your personal data and we are processing the information because we are required to do so because of a legal requirement, we will not be able to delete your personal data;
- However, if you ask us to erase your personal data and we are processing the information because you provided us with consent (for example as part of a survey response), we will be able to consider and respond to your request.

Your rights in respect of personal data we hold about you	Explanatory detail
The right to be informed about how we use your personal data	This Privacy Notice provides you with the details on how we use and process your data.
The right of access to a copy of any personal data Equiniti Trust Company processes about you, together with certain additional information	If you request to see your personal data, your initial request will be free of charge; subsequent requests may attract an administration fee. The additional information includes details of the categories and recipients of the personal data. Providing the rights and freedoms of others are not affected, we will supply to you a copy of your personal data.
The right to request us to rectify or update it	This will be relevant where the personal data we hold is or has become inaccurate or incomplete, taking into account the purposes of the processing. Please explain why you consider the data inaccurate or incomplete.

Your rights in respect of personal data we hold about you	Explanatory detail
The right to request us to erase your personal data in certain circumstances.	The circumstances when erasure can apply include when we no longer need it to meet a lawful basis for processing unless that basis is consent and you withdraw your consent or you object to the processing or the processing is unlawful. However, certain exclusions apply - where the processing is necessary for compliance with a legal or regulatory obligation or requirement or to establish, exercise or defend legal claims.
The right to request us to restrict processing it	This request can be used to stop us processing your personal data if you disagree over the accuracy of the personal data, the reason for processing or if you wish us to retain your personal data for longer than our retention period, e.g. to establish, exercise or defend a legal claim.
The right to request a copy of your personal data for data portability purposes	If you have provided personal data to us under <u>contract</u> or because you <u>consented</u> to the processing and <u>use the data by automated means</u> , then you have the right to instruct us to transmit that personal data to you or another data controller in a machine-readable format.
The right to object to us processing your personal data	You have a right to object to us processing your data where we are processing it for the purpose of legitimate interests. You can also object to direct marketing communications from us about products, offers, competitions, or services and any profiling that we can perform in relation to direct marketing. You can update your marketing preferences at any time through the use of the opt-out functionality. You have the right to withdraw your consent at any time. However, this will not affect the lawfulness of processing before the withdrawal. If you would like to receive the marketing described above, please ensure you have indicated your preferences accordingly.
Rights related to decisions based solely on automated processing	Where this processing produces legal effects or significantly affects you, you can object to this processing unless the processing is necessary as part of our contract, or is required by legislation.

Your rights in respect of personal data we hold about you	Explanatory detail
Right to lodge a complaint with a supervisory authority	<p>If you wish to raise a complaint on how we have handled your personal data, please contact our Data Protection team who will investigate the matter and report back to you.</p> <p>If you remain unsatisfied with our response or believe we are not processing your personal data in accordance with the law, you are able to contact the data protection authority in your country. In the UK, it is the Information Commissioner’s Office (ICO) who regulates Data Controllers compliance with data protection legislation. They can be contacted by email: casework@ico.org.uk, post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by telephone: 0303 123 1113.</p>

10. Useful information

10.1 - Children (16 years and under) and Vulnerable Adults

We are committed to the privacy protection of children and vulnerable adults. If you are aged 16 or under, and we need to process your personal data you must obtain the permission of your parent/guardian **before** you share your personal data with us. If we are notified that you are a vulnerable adult we will liaise with your authorised representative, once we are in receipt of the appropriate permissions

10.2 - Use of ‘cookies’

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. This information is used to track visitor use of the website and to compile statistical reports on website activity. This helps us to improve our website and deliver a better more personalised service.

It is possible to switch off cookies by setting your browser preferences. However, turning cookies off may result in a loss of functionality when using our website. For more information on how to switch off cookies on your computer, visit our full Cookies Policy.

10.3 – Social media, blogs, reviews, and similar services

Any social media posts or comments you make to us (e.g. on our own Facebook page) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they are made and could be made public by that platform. These platforms are controlled by other organizations, and so we are not responsible for this sharing. You should review the terms and conditions and privacy policies of the social media platforms you use to ensure you understand how they will use your information, what information relating to you they will place in the public domain and how you can stop them from doing so if you are unhappy about it.

Any blog, review or other posts or comments you make about us, our products and Services on any of our blog, review or user community services will be shared with all other members of that service and the public at large.

You are responsible for ensuring that any comments you make comply with any relevant policy on acceptable use of those services.

10.4 - Changes to this FPN

We review our use of your personal data regularly. We may change this Policy from time to time to keep it relevant and up to date. We will endeavour to alert you to these changes. Please look out for notices from us alerting you to these changes, via our websites or other timely communications. If you use our website and see such an alert, please review it.

By continuing to use our products and services, you will be bound by this Policy.

However, we will also tell you of the changes where required by law to do so.

This policy was issued in May 2018. If you require copies of previous versions of the Privacy Notice, please contact the Data Protection Officer using the contact details noted above.

11. Any further questions about this Privacy Notice

We hope that this Privacy Notice has been helpful in setting out how we handle your personal data and your rights to control it. If you have any questions that remain unanswered, please contact Data Protection Officer at 90 Park Avenue, 25th Floor, New York, NY 10016, or via email at EQUS.compliance@equiniti.com.