

Privacy Notice - Shareholders

This privacy notice (“**notice**”) explains how The Law Debenture Corporation p.l.c. (incorporated in England and Wales with company registration number 00030397) (“**LawDeb**”, “**us**” or “**we**”) processes personal data about its current, former and prospective shareholders and their representatives and proxies (“**you**” or “**shareholders**”). References to the “**LawDeb Group**” are to LawDeb and its subsidiaries from time to time.

This notice does not form part of any contract relating to the shares you hold.

LawDeb is the data controller of your personal data collected in connection with your shareholding in LawDeb.

In this notice you can find out more about

- what personal data we process about you and the legal basis for such processing;
- when and why we share your information with third parties, including what happens when such third parties are based outside the UK;
- how long we keep your personal data for;
- your rights in relation to any personal data we hold about you; and
- how you can contact us with any questions you may have about data protection at LawDeb.

This notice is separate from and not intended to override the terms of any contract we have with you or your rights under data protection laws.

We will amend this notice from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check this page for the latest version.

What personal data we process

LawDeb may collect personal data such as your name, contact details, dates of birth and death, bank details, national insurance number, the votes you cast and the reference number attributed to you by us as a LawDeb shareholder. This may be collected when you provide details to us directly or through your agent, stock broker or share plan administrator, for example, on shareholder application forms or stock transfer forms. We may also collect personal data when you register for events or use our website. Occasionally, this may include special category data, for example, information about health might be collected to ensure all shareholders can effectively participate in meetings.

When we collect or subsequently use your personal data, we will make sure we do this for a valid legal reason, namely:

- to manage your shareholding, and the associated rights and obligations;
- to maintain our shareholder register and contact you with shareholder related information,

including providing reports and information about meetings and dividends;

- to meet responsibilities we have to our regulators, government bodies, tax officials, law enforcement, or otherwise meet our legal responsibilities as they apply to the LawDeb Group from time to time;
- to operate and improve our business and keep our shareholders informed about our products and services, which may include targeted advertising or marketing;
- to fulfil any contractual obligation we have to you or in any manner to which you have consented; or
- for any other purposes we identify as relevant to further business interests of the LawDeb Group.

When and why we share your personal data

We are committed to respecting your privacy and will share your personal data only with a number of trusted third parties who work with us to help deliver our services, in order to fulfil our legal obligations, and/or at your request, including but not limited to:

- Computershare Investor Services PLC, our registrar, who manages our share register;
- other members of LawDeb Group, as necessary to operate our business;
- payment providers who help us manage dividend and other payments to our shareholders;
- solicitors and professional service firms who provide us with legal, audit, accountancy and consultancy services and other support;
- service providers who help operate our IT security, storage and back office systems; and
- regulators and other authorities, including the Financial Conduct Authority, the London Stock Exchange, HM Revenue and Customs and the Information Commissioner's Office (the “**ICO**”);
- any third party at your request;
- any individual or company to whom we propose to transfer or outsource our obligations and/or rights in relation to your shareholding or the administration of shareholder matters; and/or
- any other person that requires access to or receipt of your personal data in connection with or as a result of any agreement we may have with or concerning you, or our arrangements with you.

Once we receive your data, we use appropriate procedures and security features to prevent unauthorised access. We require any third-party service providers who act as data processors for us to do so too.

We require any third-party service provider who acts as a data processor for us to comply with applicable data protection laws as part of our contract with them. These service providers may, with our agreement, sub-contract certain processing activities, for example to external printing companies, data analytics providers or software

providers. Before doing so, they must check that the sub-contracted service provider has adequate security measures in place.

Protecting personal data outside the UK

Some of the organisations we share information with may be located outside of the European Economic Area ("EEA"). We will always take steps to ensure that any transfer of information outside the EEA is in accordance with legal requirements and is carefully managed to protect your privacy rights. This may include, but is not limited to the following measures:

- transfers within the LawDeb Group will be covered by an agreement entered into by members of the LawDeb Group (an intra-group agreement) which contractually obliges each member to ensure that your personal data receives an adequate and consistent level of protection wherever it is transferred within the Group;
- where we transfer your data to non-LawDeb Group members we will obtain contractual commitments and assurances from them aligned with legal requirements to protect your personal data;
- we will only transfer personal data to countries which are recognised by the UK as providing an adequate level of data protection or where we can be satisfied that alternative arrangements are in place to protect your privacy rights; and
- any requests for information we receive from law enforcement, regulators, government bodies or other authorities will be carefully validated before personal data is disclosed.

You have a right to ask us for more information about the safeguards we have put in place as mentioned above. To learn more, please see the "Your rights" section below.

How long do we keep your personal data

We generally only keep personal data for as long as is reasonably required for the reasons explained in this privacy notice. We do keep certain records - which may include personal data - for extended periods, e.g. after you have sold your shareholding, in order to meet legal, regulatory, tax, or accounting needs as applicable from time to time.

Our service providers and advisers will typically retain your personal data for a certain period after our agreement ends with them. This is to enable them to deal with queries into the future and protect themselves against legal claims.

It is important to ensure that the personal data we hold about you is accurate and up-to-date, and you

should let us know if anything changes - for example, if you move home or change your phone number or email address. To manage your details, shareholdings and communication preferences please contact our registrar Computershare at The Pavilions, Bridgwater Road, Bristol BS99 6ZZ or via the Computershare Investor Services website at <http://www.investorcentre.co.uk>.

Your rights

You have the following rights in relation to your personal data:

- the right to be informed about how your personal data is collected and being used;
- the right to access the personal data we hold about you;
- the right to request the correction of inaccurate personal data we hold about you;
- the right to request the erasure of your personal data in certain limited circumstances;
- the right to restrict processing of your personal data where certain requirements are met;
- the right to object to the processing of your personal data;
- the right to request that we transfer elements of your personal data either to you or another service provider; and
- the right to object to automated decision making processes using your personal data, if any.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information to the right individual.

In certain circumstances, we may not be able to do what you have asked, for example due to legal or regulatory requirements or if it would impact the duty of confidentiality we owe to others.

To exercise any of the above rights, or if you have any questions relating to your rights, please contact us by using the details set out in the "Contacting us" section below. More information about your legal rights can also be found on the ICO's website at <https://ico.org.uk/for-the-public>.

If you are unhappy with the way we are using your personal data you can complain to the ICO at <https://ico.org.uk/make-a-complaint> or, if you do not reside in the UK, your local data protection regulator.

Contacting us

In the event of any query or complaint in connection with the information we hold about you, please email dp@lawdeb.com or write to us at The Law Debenture Corporation p.l.c., 8th Floor, 100 Bishopsgate, London, EC2N 4AG.