



**PHOENIX**  
investor relations

Phoenix Investor Relations srl.

## PRIVACY NOTICE

### **Section 1 - About us and this notice**

1.1 We are Phoenix Investor Relations srl.

Should you have any questions or concerns about this Privacy Notice or the processing of personal data we hold about you, please contact us:

By Post : Phoenix Investor Relations srl., Chaussée de la Hulpe, 1170 Brussels, Belgium

By phone : +322 882 39 19

By email : [gdpr@phoenix-ir.com](mailto:gdpr@phoenix-ir.com)

1.2 This notice (the "Privacy Notice") provides information about how Phoenix Investor Relations scl. and [www.CorporateAccessNetwork.com](http://www.CorporateAccessNetwork.com) ("Phoenix", "Phoenix-IR", "CAN" "we", "us", "our") gathers and uses personal information.

1.3 We are committed to respecting the confidentiality of the personal information you supply to us and all data will be processed in accordance with data privacy laws. You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.

1.4 If you do not agree with our use of your personal data as set out in this Privacy Notice, you should not submit your personal information to us. However, if you do not wish to submit your personal information, or if you wish to exercise your rights to prevent us using your data you should be aware that we may not be able to do business with you.

1.5 We reserve the right, at our discretion, to change, modify, add to, or remove portions from, our Privacy Notice. We will of course notify you of any changes where we are required to do so. Any such notifications may be made by way of our websites.

### **Section 2 - Your rights**

2.1 You have certain rights in relation to your personal data. Under certain circumstances, by law you have the right to:

Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are processing it lawfully.

Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.

Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it.

Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

Request the transfer of your personal information to another party in a machine- readable, commonly used and structured format.

2.2 If you want to exercise any of these rights then please contact us using the details in section 1. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we may need to discuss with you whether our use of your data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement. We will respond to your request within one month of receipt of your request. In some cases we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

2.3 Your duty to inform us of changes - It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

2.4 Fees - You will not have to pay a fee to access your personal information (or to exercise any of the other rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the information. Alternatively, we may refuse to comply with the request in such circumstances.

2.5 What we may need from you - We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **Section 3 - Information we collect**

3.1 We may collect your personal information from a variety of sources. Where necessary we collect information directly from you or indirectly from third parties, and through your use of our websites.

3.2 Information you provide to us - This section details the information we collect about you in the course of your use of our websites and otherwise in your interaction and correspondence with us. We may collect:

Basic personal details including your name, email address, telephone number and any other contact details you supply;

Your job title;

information about your job, including specific geographic or sector responsibility or coverage you may have;

requests for meetings or indications (verbally or via our websites ) that you have an interest in meeting a company

records of all events we organize that you have registered for and / or attended; and

biographical data including employment and education history.

Please note that we may record telephone (both mobile and landline) conversations, which we may do without a warning, and we may keep copies of electronic communications.

3.3 Information we collect from other sources - We may receive information about you from our clients, third party service providers like Bloomberg, IPREO, and Nasdaq, as well as publicly available sources such as LinkedIn, the financial press and the internet. We may collect the following information from third parties:

Basic personal details including your name, email address, telephone number and any other contact details you supply;

Your job title;

information about your job, including specific responsibility or coverage you may have;

requests for meetings or indications (verbally or via our websites ) that you have an interest in meeting a company

records of all events we organize that you have registered for and / or attended; and

biographical data including employment and education history.

3.4 Information from your use of our websites - We collect information about your use of our websites and the devices you use. We may collect information on:

how often you access our websites;

the way in which you navigate around them;

how long you spend on particular pages;

the operating system, hardware, software versions, browser configuration, display size, browser configuration of the devices you use; and

connection information such as IP addresses.

## **Section 4 - How we use the information we collect**

4.1 General uses of information - The information which we collect and what we use it for will depend on the nature of our business relationship with you. We use your information:

- to provide you with services which you have requested and to fulfil our contractual obligations towards you;
- to fulfil our contractual obligations to third parties to whom you have provided your information;
- for our internal business administration and record keeping purposes;
- to respond to your enquiries submitted through our websites;

4.2 Information for marketing purposes - We may use your information to identify products and services that we think may be of interest to you. We will only send you marketing messages for products and services where these are similar to those that we have already provided to you.

4.3 You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at any time. You can also let us know at any time that you wish to change your mind and to start receiving such messages. You can do this:

- by replying directly to the marketing message;
- in case you wish to withdraw from all marketing communications, you can also unsubscribe from all marketing by clicking the appropriate link in any email you receive;
- at any other time by contacting us (see section 1).

## **Section 5 - Our basis for collecting and using the information**

5.1 We are entitled to use your personal data in the ways set out in this Privacy Notice on the following basis:

- the use of personal data in this way is necessary for the provision of our products and/or services;
- ensuring the quality of the products and services we provide to you;
- collecting information for marketing purposes;
- communicating with you;
- statistical analysis;
- you have consented to such use;
- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

5.2 We do not currently, and will not process any sensitive and special category information (this includes data concerning your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, or your sexual orientation).

If provision of your personal information is a legal or contractual requirement or a requirement necessary to enter into a contract with us, and you choose not to provide it, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you.

If you do choose to provide your consent you can withdraw it at any time by contacting us (see section 1).

## **Section 6 - Sharing your information**

We will not disclose your personal information to third parties except as detailed in this Privacy Notice.

Where you have registered for, or attended an event we may be organizing, or if you make a request for a meeting or indicate that you have an interest in meeting a company verbally or via our websites [www.phoenix-ir.com](http://www.phoenix-ir.com) or [www.CorporateAccessNetwork.com](http://www.CorporateAccessNetwork.com), your personal details (as described in Section 3 above) may be disclosed to the company concerned.

Where necessary, we disclose your personal data to third parties that are specifically engaged by us to provide services to us.

We may share information with the following entities which we have appointed to process data on our behalf in order to allow us to provide products or services that you have requested:

information technology, including providers of client relationship management systems, and information security providers;

analytics companies;

data storage suppliers;

We may disclose to law enforcement agencies and regulators, government departments or competent government authorities, any personal data where we are under a duty to disclose or share your information in order to comply with any legal or regulatory obligation, or if we reasonably consider that this is necessary to help prevent or detect fraud or other crime or to protect our rights, property, or safety, or that of our customers or others. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or providers who will make such filings or disclosures on our behalf.

## **Section 7 - Where we store your information**

We may occasionally transfer, use and/or store your personal information outside of the European Economic Area ("EEA") and the laws of some of these destination countries may not offer the same standard of protection for personal information as countries within the EEA. Your personal information may also be processed by staff operating outside the EEA who work for us or for one of our suppliers.

We may update this list from time to time and any changes will be communicated to you via an update to this Privacy Notice.

## **Section 8 - Keeping your information**

We will keep your information only for as long as necessary depending on the purpose for which it was provided.

## **Section 9 - Security**

We acknowledge that the information you provide may be confidential and we will maintain the confidentiality of and protect your information in accordance with all applicable laws. We employ appropriate technical and organizational security measures to help protect your personal data against loss and to guard against access by unauthorized persons.

In addition, any employees, agents, contractors and other third parties who process your personal data will only do so on our instructions and will be subject to a duty of confidentiality.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of data transmitted to our websites; any transmission is at your own risk.

## **Section 10 - Links to other websites**

Links on our websites may take you to third party sites over which we have no control. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy notices on those linked websites. We are not responsible for any linked websites.

## **Section 11 - Information tracking**

Information tracking

We may use third party technology, such as Google Analytics, Statcounter, and SessionCam to provide us with information about how you use our websites. This may include the use of cookies to collect anonymous information, including; the number of visitors to our websites, where they have come to our websites from, the pages they visit and the length of time they have spent on our websites. We may use this information to compile statistics and to help us to improve our websites and the services we offer.

Google's privacy policy is available at <http://www.google.com/policies/privacyhtml>

Statcounter's privacy policy is available at <https://statcounter.com/about/legal/>

SessionCam's privacy policy is available at <https://sessioncam.com/privacy-policy-cookies/>