

Website Privacy Notice (UK)

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Definitions

Affiliate means any affiliated company as defined in the FCA Handbook of rules and guidance,.

Client for the purpose of this Privacy Notice, the term '**Client**' means existing, past and prospective clients

Controller (aka Data Controller) means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the **processing** of personal data, subject to section 6 of the Data Protection Act 2018 (meaning of "**controller**").

Personal Data (aka Personally Identifiable Information (PII)), means any information relating to an identified or identifiable living natural person (the '**data subject**'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to



one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This includes data and other information which is in the possession of (or likely to come into the possession of) the **Controller**.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Processor (aka Data Processor) means a natural or legal person, public authority, agency or other body which processes **personal data** on behalf of the **Controller**

Special Categories of Personal Data means **personal data** revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

Who We Are

Sova Capital Limited (Sova) is an FCA authorised and regulated broker based in London, offering institutional and corporate clients a full range of investment brokerage services, including independent research, securities trading, electronic and high-touch execution and public capital markets financing.

Sova is located at:

12th Floor,
88 Wood Street,
London EC2V 7RS
United Kingdom

With UK company registration number 4621383.

Introduction

Sova is committed to meeting its contractual, statutory and administrative obligations and ensuring that client personal data is handled in accordance with the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018 (DPA 2018) collectively known as "Privacy Law". This notice describes how Sova collects and uses your personal data, the rights you have and the control you can exercise in relation to it.

Scope

This Privacy Notice applies to all clients. However, the personal data that Sova processes will vary depending on the client's specific status and personal circumstances. It applies to any products and services supplied by Sova either directly or via a web site to its clients.

Sova is a "**Controller**" and is required under Privacy Law to notify all clients of the information contained in this Privacy Notice.

Purpose

This Privacy Notice describes how Sova collects, uses, shares or otherwise processes client personal data as a Controller in the course of business operations and how a client may exercise their rights in relation to the processing of that personal data before, during and after a working relationship with Sova in accordance with Privacy Law.

Data Protection Principles

Privacy Law states that any personal data that Sova holds about its clients must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that Sova has clearly defined and not used in any way that is incompatible with those purposes.
3. Relevant to the defined purposes and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the defined purposes.
6. Kept securely.

Why Sova Needs to Collect, Use and Process Client Personal Data

Sova collects a client's personal data when a client:

- Requests information from Sova about products and services provided;
- Enters into a contract with Sova for the provision of products and services;
- Signs up to attend a presentation, webinar or other event hosted by Sova.

Sova processes that Personal Data to:

- Communicate with clients about Sova's products and services prior to becoming a client based on the client's consent to receive marketing material;
- Manage business operations relating to the provision of products and services to clients;
- Perform contractual obligations;
- Comply with legal obligations or regulatory requirements, including those laid down in tax and company law (including compliance with the Foreign Account Tax Compliance Act and the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information);
- Undertake and comply with anti-money laundering (AML), know your client (KYC), counter-terrorist financing (CTF) laws and regulations and screening against sanctions lists.

The Client Personal Data that Sova Collects

Sova may collect the following types of personal data from clients, including personal data relating to a client's Directors, Officers, employees, beneficial owners and any person or organisation appointed to act on the client's behalf, as applicable. The types of personal data below, comprise, but may not be limited to a data subject's:

Identity and Contact Data

Name, address, telephone number(s), email address(es), date of birth, passport details, nationality or citizenship, employment history and status, education and / or professional background, tax information, employee number, job title and function, knowledge and experience about trading, risk profile and risk tolerance and other personal data concerning preferences relevant to the products and services that Sova provides.

Financial and Payment Data

Bank account and bank details, e-wallet (if applicable), and other data necessary for processing payments and fraud prevention, including credit /debit card numbers, other related billing information.

Business Information



Information provided in the course of the contractual or client relationship between a client or prospective client and / or the client's organisation and Sova, or otherwise voluntarily provided by the client or prospective client or their organisation. This also includes Information about income and wealth including details about assets and liabilities, account balances, trading statements, tax and financial statements, and any information relating to complaints, investigations or proceedings.

Information relevant to Sova's products and services

Personal data relevant to any transaction or actions performed by Sova to fulfil a client's instructions or provide products and services or details of products and services or other information requested by a client.

Profile and Usage Data

User identities and passwords for access to online Sova resources, date and time of access, preferences for receiving Sova or authorised third party, marketing information, communication or terms entered into searches, page response times, download errors, length of visits, page interaction information (such as scrolling, clicks, and mouse-overs), referring pages from another web site or web sites visited on leaving Sova's web site(s), any related audit data and any information derived from relevant monitoring systems.

Technical Data

Information collected during visits to Sova's web site(s), the Internet Protocol (IP) address, login data, browser type and version, device type, time zone setting, browser plug-in types and versions, operating system and platform.

Cookie Data

Profile, usage and technical data as collected by cookies in use or selected by the user of the web site(s).

Special categories of personal data

Criminal record data (actual or suspected) for screening purposes.

Health data for visitors, (e.g., disability status for health and safety reasons), dietary information.

Recordings

Recording of phone calls for regulatory purposes;

Recording of some meetings to ensure accuracy of minutes and records from presentations.

Recruitment Data

Personal information required to identify the prospective recruit, their right to work in the UK, their academic qualifications, references, special categories of personal data necessary for ensuring legislative compliance during employment and interview notes.

It is important that client personal data that Sova holds is complete, accurate and current. It is a client's responsibility to advise Sova of any changes in personal data during the working relationship with Sova.

In addition to the personal data above, Sova will retain records of a client's trading records, including:

- Products traded;
- Historical information relating to trading undertaken; and

- Communications with Sova in relation to products and services provided

If a client visits a Sova office, visit records will be collected. This may include CCTV images of the visit, disability or dietary needs to ensure that health and safety requirements are met – this requires explicit consent as it is a special category of personal data.

If a client attends a webinar or leaves messages on voicemail, audio recordings of client interactions will be recorded.

Where AML or KYC checks are carried out, Sova may require additional documented information to support claims made.

Sova may occasionally ask for personal data on a voluntary basis (e.g., market research, satisfaction surveys or special offers).

The personal data above will be provided to Sova or the screening providers who assist with legal obligations applicable to Sova.

Sova may also collect, share and use 'Aggregated Data' (e.g., statistical or demographic data) for any purpose. Aggregated data may be derived from a data subject's personal data, but this data is no longer defined as 'personal data' as it will not identify, directly or indirectly, a data subject. Examples of this could include, but not be limited to:

- Numbers / percentages of users visiting a specific page on Sova's web site; or
- Numbers or percentages of data subjects responding to a marketing campaign.

How Client Personal Data is Collected

Sova may collect personal data about clients from the following sources:

- Automatically collected or generated (e.g., web site visit information, device information or trading details)
- CCTV images from premises landlords or taken using Sova's own CCTV systems (if applicable)
- Directly from the client, typically phone, email, post, filled in paper or electronic forms or other electronic means
- From third parties including others who are entitled to share this information (e.g., credit agencies, search information providers, business partners, banking and related service providers, analytics providers, public sources or any other service providers), but in each case, as permitted by Privacy Law.

Personal Data Collected About Data Subjects from Third Parties

In some cases, a third party (e.g. a client, supplier, etc) may provide personal data to Sova about other people (such as customers, directors, officers, shareholders or beneficial owners). Sova must be assured by the third party that they have given those data subjects an appropriate notice that they are providing their personal data to Sova and have obtained their consent to that disclosure.

Consequences of Failing to Provide Some Types of Personal Data

If a client fails to provide certain personal data or other information when requested, Sova may not be able to perform the contract proposed, or entered into, or be prevented from complying with legal obligations and regulatory requirements.

Lawful Basis for Processing a Client's Personal Data



Sova will only process a client's personal data when and where there is a lawful basis for processing that personal data, this includes the following circumstances:

1. Where the client has given consent for their personal data being processed for one of more specified purposes (e.g., marketing, attending an event). The legal basis for this processing is Article 6, 1, a;
2. Where Sova needs to perform the contract with the client. The legal basis for this processing is Article 6, 1, b;
3. Where Sova needs to comply with a legal obligation to which Sova is subject. The legal basis for this processing is Article 6, 1, c.
4. Where processing is necessary to protect the vital interests of the data subject or other interested parties. The legal basis for this processing is Article 6, 1, d
5. Where it is needed in the public interest or for official purposes. The legal basis for this processing is Article 6, 1, e; or
6. Where it is necessary for Sova's legitimate interests (or those of a third party) and these interests are not overridden by the client's interests, rights and freedoms. The legal basis for this processing is Article 6, 1, f.

Note 1: Generally, Sova does not rely on Consent as a lawful basis for processing personal data, other than in relation to sending marketing information (internal or third party) by email or SMS. Data subjects have the right to withdraw their consent at any time by contacting the DPO.

Note 2: Sova may process personal data for more than one lawful reason, depending on the specific purpose for which that personal data was collected by Sova.

Legitimate Interests

Sova has legitimate business interests in:

- providing broking and advisory products and services;
- managing business and relationships with clients, prospective clients, employees and suppliers;
- understanding and responding to inquiries and client feedback;
- understanding how clients use Sova's products, services and web sites;
- identifying what clients want and developing our relationship with the client;
- improving Sova's products, services and offerings;
- enforcing terms of engagement and web site and other terms and conditions;
- ensuring Sova's systems and premises are secure;
- managing the supply chain;
- developing and managing relationships with business partners;
- operating consent management, including withdrawal of consent from direct marketing, if requested; and
- sharing data in connection with acquisitions and transfers of by Sova.

How Sova Uses a Client's Personal Data

Sova will only use a client's personal data in accordance with the Privacy Law and this Privacy Notice. This includes to:

- Advertise, provide, and assess the effectiveness of Sova's events, promotional campaigns, and publications;
- Business relationship management with clients, prospective clients, event attendees and marketing;



- Client due diligence;
- Client surveys and feedback;
- Communicate by post, e-mail, telephone or any other electronic means about the products and services that Sova provides that may be of interest to clients, but only if a client has consented (this may include sending client details to third parties who may provide some products or services on Sova's behalf);
- Comply with any legal obligation or regulatory requirement;
- Detect, prevent and investigate illegal or prohibited criminal activities and in the protection of Sova's legal rights (including liaison with Regulators and Law Enforcement agencies);
- Expand and maintain the Sova contact list;
- Event management;
- Furthering Sova's business purposes, including internal administration and billing;
- Manage a client's account(s) for online products and services and provide technical notices, updates, security alerts, and other administrative messages;
- Managing suppliers;
- Notify clients about changes to products and services that Sova provides;
- Operate, troubleshoot, and improve the products and services that Sova provides, including online services;
- Perform the services under the contract Sova has entered into with a client;
- Process an application for the requested products or services;
- Respond to enquiries or communications relating to Sova's products and services;
- Service provision of Sova's products and services;
- Understand how clients use Sova's products and services including generating and analysing statistics of usage; and
- Website monitoring and management.

Sova will only use a client's personal data for the purposes for which it was collected unless Sova reasonably considers that it should be used for another reason that is compatible with the original purpose.

Should Sova wish to use a client's personal data for an unrelated purpose, Sova will notify all relevant clients explaining the legal basis for this.

Sova may use anonymous, pseudonymised or aggregated information that does not identify a client for any purpose, as permitted by Privacy Law.

Sova may process a client's personal data without their knowledge or consent where this is required or permitted by Privacy or other applicable Law.

Summary of How Sova Uses Personal Data

Set out in a tabular format is a description of how Sova uses personal data, either supplied by the data subject or from other sources. Where personal data is used for more than one legal purpose, this is clearly identified. Should a data subject require further information on the specific legal ground that is relied on for processing personal data, please contact the DPO as below.

Purpose of Processing	Categories of Personal Data	Lawful Basis
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<p>To manage a client's dealings with Sova</p>	<p>Identity and Contact Data</p>	<p>Performance of a contract with the client</p> <p>Compliance with a legal obligation</p> <p>Necessary for Sova's legitimate interests</p>
<p>To facilitate financial dealings with and for a client</p>	<p>Financial and Payment Data</p>	<p>Performance of a contract with the client</p> <p>Compliance with a legal obligation</p> <p>Necessary for Sova's legitimate interests</p>
<p>To optimally manage the client's relationship with Sova.</p>	<p>Business Information</p>	<p>Performance of a contract with the client</p> <p>Compliance with a legal obligation</p> <p>Necessary for Sova's legitimate interests</p>
<p>To perform transactions on a client's behalf or to provide information relating to Sova's products and services requested by a client.</p> <p>For marketing purposes.</p>	<p>Information relevant to Sova's products and services</p>	<p>Performance of a contract with the client</p> <p>Necessary for Sova's legitimate interests</p> <p>Consent for marketing</p>
<p>To manage a client's access to Sova web sites and to optimise their use for clients.</p>	<p>Profile and usage data</p>	<p>Necessary for Sova's legitimate interests</p>
<p>To optimise web site usage and continuous improvement of web site functionality</p>	<p>Technical data</p>	<p>Necessary for Sova's legitimate interests</p>
<p>To optimise web site usage and continuous improvement of web site functionality</p>	<p>Cookie Data</p>	<p>Consent for optional cookies</p> <p>Necessary for Sova's legitimate interests</p>
<p>To manage the health and safety of clients and visitors when onsite.</p> <p>To undertake due diligence</p>	<p>Special Categories of Personal Data</p>	<p>To protect the vital interests of the client in case of need</p> <p>Compliance with a legal obligation</p>
<p>To record transactions undertaken on behalf of the client.</p> <p>To provide an accurate record</p>	<p>Recordings</p>	<p>Performance of a contract with the client</p> <p>Necessary for Sova's legitimate interests</p>

of interactions between the client and Sova		Consent for recordings of meetings and presentations.
To ensure that prospective employees are suitable for employment by Sova.	Recruitment data	Compliance with a legal obligation Necessary for Sova's legitimate interests

Disclosure of a Client's Personal Data

Once a client has entered into a contract with Sova and / or completed a client application form for the provision of goods and / or services (including marketing material), Sova may share client personal data with:

- Agents appointed by a client (e.g., Investment Managers, Lawyers, those with a Power of Attorney) for whom prior consent has been given to Sova for sharing the client's personal data;
- Appropriate parties in the event of an emergency, including but not limited to emergency services, in case of BCP invocation or ambulance to protect the health and safety of employees and clients on site;
- Financial service providers and agents (including their sub-contractors) or third parties (e.g., Sova's clearing agents, custodians, counterparties, other brokers and securities depositories) who process client information on Sova's behalf solely to provide their services to clients, each complying with their own legal obligations or pursuing their legitimate interests as described in this Privacy Notice;
- Other service providers and specialist advisers who have been contracted to provide Sova with services such as IT, trading platforms, apps providers (where applicable), analytics and online marketing optimization, financial, audit, regulatory, compliance, insurance, AML, KYC checks, sanctions checking, research, event hosting services;
- Payment service providers processing a client's transactions, including but not limited to IT support services and screening services;
- Third parties in order to meet Sova's legal and regulatory obligations, including statutory or regulatory bodies, law enforcement agencies, other competent bodies in accordance with legal or regulatory requirements, credit reference agencies and company auditors as permitted by Privacy Law or other law(s) in the jurisdiction of Sova's operations. In these circumstances, Sova will make reasonable efforts to notify the data subject before disclosure of this information, unless prior notice is prohibited by applicable law or it is not possible or reasonable in the circumstances;
- Third parties who may manage Sova's business or who wish to purchase Sova's business or information assets, including personal data. If such a change should occur, then the new owners or managers, acting as controllers, shall process personal data in the manner set out in this Privacy Notice.
- Third parties outside the UK and EEA will need a transfer out of the UK and EEA. If this is the case, then Sova shall ensure that a similar level of protection shall be applied to personal data processing by appropriate means, including , but not limited to, Standard Contractual Clauses, Data Processing Agreements, International Data Transfer Agreements or other legal instruments. Where appropriate, Transfer Impact assessments shall be undertaken.

Note: There are multiple possible recipients of a client's personal data for business purposes, as above, and it is not practical to list them. There are also possible changes,



based on transactions, where a different recipient is used. Therefore, categories of recipients have been used above.

Where disclosure of a client's personal data is required to a third party, Sova will only disclose the minimum amount of personal data to meet contractual or legal requirements.

Third parties are only permitted to use this personal data to provide defined and documented services to Sova and are not permitted to use this personal data for any other purpose.

Sova web site(s) and apps may have links to the third party or their web site(s). This Privacy Notice does not cover these third party's use of client personal data and clients should check with each linked web site to determine their privacy practices and procedures relating to the processing of the client's personal data.

Sova may share anonymous, pseudonymised or aggregated information that does not identify a client for any purpose, as permitted by Privacy Law.

Note 1: If a client posts to any other of Sova's online services or social media pages, these may be available to other service users or made publicly available.

Note 2: Sova does not sell any data subject's personal data.

Use of Automated Decision Taking

Sova may use a client's personal data to undertake automated online identity and background checks for KYC or other purposes and for the purposes of relevant checks in the detection, prevention and investigation of illegal or prohibited criminal activities (e.g., AML and CTF).

Data Retention

Sova will only retain a client's personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting, or reporting requirements.

Sova regularly reviews client records to ensure that client personal data is only retained in accordance with these purposes, legislative or regulatory requirements or where it is necessary to retain it for establishment, exercise or defence of actual or potential legal claims.

Where retention periods indicate disposal of client's personal data, Sova will securely destroy all client personal data in accordance with the Sova Data Retention Policy and Schedule that meets applicable laws and regulations.

In some cases, a data subject can request Sova to delete their personal data as a right (Right to Erasure – otherwise called the 'right to be forgotten'). To exercise this right, the data subject shall make a data subject access request, as defined in this Privacy Notice.

In some circumstances, Sova may anonymise a data subject's personal data (so that it cannot be associated with a data subject) for research or statistical purposes. In the case the data is no longer defined as personal data, and Sova may use this personal data indefinitely without further notice to the data subject.

In general terms, as outlined in the Sova Retention Schedule, personal data should be held no more than 5 years after its trigger point or 6 years for financial records. Trigger points vary according to legislative and regulatory requirements and business need. Should a data subject wish to know the specific retention period of a category of personal data this can be requested from the DPO, with contact details below.



Representative

As Sova is resident in the UK (and no longer in the EU) it has appointed a Representative in the EU to represent Sova in matters relating to the processing of personal data by EU Supervisory Authorities or data subjects.

The Representative is:

Ametros Ltd
Unit 3D
North Point House
North Point Business Park
New Mallow Road
Cork
Republic of Ireland
Email: gdpr@ametrosgroup.com
Website: www.ametrosgroup.com

Client Rights in Relation to Processing Personal Data in Sova

Clients have a number of rights, under certain circumstances, in relation to the processing of their personal data, these are the right to

- be informed about the collection and the use of their personal data;
- access personal data and supplementary information;
- have inaccurate personal data rectified, or completed if it is incomplete;
- erasure (to be forgotten) in certain circumstances;
- restrict processing in certain circumstances;
- data portability, which allows the client to obtain and reuse their personal data for their own purposes across different services;
- object to processing in certain circumstances;
- rights in relation to automated decision making and profiling where this is conducted without human intervention and where the client believes it is to their legal detriment; and
- the right to withdraw consent at any time (where relevant).

To exercise any of these rights, contact the DPO, who oversees compliance with this Privacy Notice as below:

dpo@sovacapital.com

It is important that the personal data that Sova holds about clients is accurate and current.

Note: It is the client's responsibility to advise Sova of any changes in their personal data.

To exercise these rights, a requestor shall be required to prove their identity, confirm the right to exercise a right and specific details of the personal data in the right to be exercised. This is a security control to ensure that personal data is not disclosed to, modified or deleted by an unauthorised party.

Sova will respond to any valid exercise of a data subject's rights within a month. However, for a complex request this may take longer than a month, in which case Sova shall advise the requestor of this delay.

The Right to Complain

To Sova



Whilst Sova works to the highest standards when processing client personal data. If any client has any queries or concerns relating to how Sova processes their personal data, they should contact the DPO:

dpo@sovacapital.com

UK Information Commissioner's Office (ICO)

If still dissatisfied by the DPO's answer, a complaint can be made to the Information Commissioner's Office (ICO) who is the UK Supervisory Authority.

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire, SK9 5AF

Email: casework@ico.org.uk
Telephone: 0303 123 1113
Textphone: 01625 545860
Monday to Friday, 09:00 to 16:30

Alternatively, it is possible to have a 'Live Chat' via the ICO's web site,

<https://ico.org.uk/make-a-complaint/>

EU Lead Supervisory Authority (LSA)

EU data subjects may contact the ICO as above or the EU Lead Supervisory Authority (LSA).

The Lead Supervisory Authority (LSA) for the EU

Data Protection Commission
21 Fitzwilliam Square South
Dublin 2
D02 RD28
Republic of Ireland

They prefer contact using post (as above) or the webform at:

<https://www.dataprotection.ie/en/contact/how-contact-us>

Transfers of Client Personal Data

The UK has been defined as 'Adequate' by the EC for transfers of personal data (June 2021).

Where transfers outside the UK and EU are undertaken, then they are subject to appropriate safeguards, including:

- Standard Contractual clauses (SCCs);
- Data Processing Agreements (DPAs);
- International Data Transfer Agreements (IDTAs); and
- Transfer Impact assessments (TIAs) shall be undertaken, where appropriate.

Copies of these templates can be obtained from the DPO, if required

dpo@sovacapital.com



Electronic Communications Containing Client Personal Data

Clients (or their agents) may send personal data to Sova electronically.

Sova is not responsible for the security of these communications and recommends that clients use secure means for them.

Sova will communicate electronically with clients (or their agents) using either encrypted files or secure messaging.

To access Sova's online services, clients must register as a user and be granted a user ID and a password after validation to verify the user.

Cookies

Cookies are small text files, processed and stored by web browsers, that web sites place on the user's device that they are using to browse the web site. Cookies allow web sites to recognise the user's device and preferences and provide information to the owners of sites which can be used to improve the online experience.

More information about cookies and similar technologies can be found at www.aboutcookies.org.

When visiting Sova's web site and clients are logged in to the Customer Portal, cookies may be used for:

- Keeping users signed in; and
- Understanding how users use the web site;

Note: Cookies are only used when logged into the Sova Customer Portal.

Sova uses the following cookies:

Strictly necessary cookies. These are cookies that are required to allow Sova to deliver the requested services and for the operation of the web site. Sova does not require user consent to use these cookies but it may be possible to block these cookies. However, without these cookies, the web site may not work as expected and certain services may not be provided.

Analytical or performance cookies. Sova may use certain cookies to give users the best experience possible as they navigate around the web site and use its features. For example, these cookies allow Sova to recognise users when they return to the Sova web site(s) and enable personalisation of content tailored for the user and remember preferences set. These cookies also record site visits, the pages visited and the links followed. Sova use this information to make the web site and information displayed on it more relevant to user's interests.

All recent versions of popular browsers give users a level of control over cookies.

Users can set browsers to accept or reject all, or certain, cookies. For instructions on how to manage cookies, please read the 'Help' section of the browser or visit www.aboutcookies.org.

Personal Data Security

Sova has put in place information / cyber security measures to protect client personal data against loss, unauthorised access, modification or disclosure whilst at rest, use or in transmission.



Technology controls include:

- Firewalls & Intrusion Detection / Prevention;
- Endpoint Detection and Response;
- DDoS Protection;
- Malware protection;
- Security Awareness Training;
- Patch and Configuration Management Systems;
- Secure Disposal Tools;
- Mobile Device Management;
- Remote Device Encryption;
- Physical & Logical Access Controls subject to regular review for continued business need;
- Vulnerability Scanning; and
- Passphrase Management and Multifactor Authentication Tools.

Procedural controls include:

- Comprehensive Policy Management Program;
- Cyber Risk Assessments;
- Vulnerability Management and Penetration Testing Program;
- Global Internet Facing IP scans;
- Business Continuity and Disaster Recovery Management;
- Security Device and Application Audit Log Reviews; and
- Ensuring that Processors have security controls in place at least equivalent to those in Sova.

People controls include:

- Industry certified and recognized information / cyber security staff;
- Robust information / cyber security awareness training;
- Online compliance and data protection / privacy courses;
- Pre-employment background screening; and
- Employee confidentiality agreements.

Sova has implemented incident response procedures to deal with any adverse events that may affect client or Sova information. These are subject to regular exercising with a range of scenarios, Where this affects personal data, either actual or suspected, data subjects and relevant authorities, including relevant regulators, shall be notified where this is a legal or regulatory requirement.

Links to Third Party Web Sites

The Sova web site(s), newsletters, email updates and other communications may, from time to time, contain links to and from third party web sites. Any personal data that is provided through these third party web sites is not subject to this Privacy Notice and the treatment of a data subject's personal data by third party web sites is not Sova's responsibility.

Each third party web site should have its own Privacy Notices which will set out how personal data is processed by the third party on visiting or providing information to their web site

Changes to this Privacy Notice

Sova may change, modify or adjust this Privacy Notice from time to time, however, this will not reduce any rights defined in this Privacy Notice.

Any changes made to this Privacy Notice in the future will be found on the Sova web site.



<https://sovacapital.com/terms/scl-privacy-information-notice/>

Copies are also available by post, please contact the DPO if you require a copy.

Contacting Sova's DPO

To contact Sova's DPO by post:

Data Protection Officer
Sova Capital Ltd
12th Floor,
88 Wood Street,
London EC2V 7RS

dpo@sovacapital.com

Dated January 2024