

Boston Partners (UK) Ltd.

Privacy Policy

Boston Partners (UK) Ltd. ("BP") is committed to protecting your personal data and your privacy. We endeavour to ensure that any personal data we collect about you will be held and processed strictly in accordance with the Data Protection Act 1998 (DPA) and the European General Data Protection Regulation (GDPR). The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR unless otherwise indicated.

Scope

This Privacy Policy demonstrates how BP handles the Personal Data you provide to us:

- by you interacting with us as a prospective, current or former client and for ongoing services we are providing to you or your organisation.
- by you submitting information to us through our website or when you hand over a business card to a member of staff.

2. Identity and Contact Details of Data Controller

For the purposes of the DPA and the GDPR, BP is the controller of your data. If you have any queries regarding this policy or complaints about our use of your data, please contact us at the address below and we will do our best to deal with your complaint or query as soon as possible.

The Chief Executive Boston Partners (UK) Ltd. 32 Cornhill London EC3V 3SG

3. Your data

Personal data about you collected by us will comprise of one or all of the following:

- your name;
- your contact details, consisting of professional/work telephone/mobile number, email address and office address;
- your job title;
- the name of your employer.

We may in exceptional circumstances collect data about any past criminal convictions where you have disclosed this to us in the course of business. We will neither collect nor hold any other personal data relating to any of your personal financial situation, ethnicity, religion or other data that might be described as sensitive.

4. What we use your data for

The table below sets out the purposes for which we may process your data and the legal basis for the processing:

To provide services to you

We are unable to provide services to you unless you disclose personal data to us. That may include the services set out in your agreement with us or our parent company or in response to any enquiry you have submitted. As such, your disclosure of personal data to us is on the legal basis of our performance of our or our parent company's contract with you and our legitimate interest in so doing.

To respond to requests for information from regulated bodies or government agencies

Exceptionally we may be requested or required to disclose to (for example) the Financial Conduct Authority details about you and the services we provide. As such, our disclosure of your personal data to us is on the legal basis of our performance of our compliance with a legal obligation or our legitimate interest in so doing.

To keep you informed of any activities undertaken by us which we believe may be of interest to you

This use will include sending you email and postal marketing.

5. Who we share your data with

Please note that we may on occasion be required to share your information with third parties who provide services on our behalf. For example, we may pass on your details to a group or affiliated company. We have taken steps to ensure that all such entities keep your data confidential and secure and only use it for the purposes that we have specified and have informed you of. These service providers are subject to data processing requirements that are equivalent with the requirements set out in the GDPR.

In relation to any other third parties, we will only disclose your information in the following circumstances:

- where you have given your consent;
- where we are required to do so by law or enforceable request by a regulatory body;
- where it is necessary for the purpose of, or in connection with legal proceedings or in order to exercise or defend legal rights; or
- if we sell our company, go out of business, or merge with another company.

6. Retention Period

Any information we use for marketing will be kept with us until you notify us that you no longer wish to receive this information, unless we request your consent to store it for a longer period.

7. Your Rights in relation to your data

Under the GDPR, you will have the following rights in relation to how we process your data:

- Right to request access you may obtain confirmation from us whether your data is being processed and, if so, access to your data.
- Right to rectification and erasure you have the right to obtain rectification of inaccurate personal data we hold concerning you and to obtain the erasure of your data without undue delay in certain circumstances.
- Right to restriction of processing or to object to processing you may require us to restrict the processing we carry out on your data in certain circumstances or to object to us processing your data.
- Right to data portability you have the right to receive your data in a structured, commonly used and machine-readable format.
- Right to withdraw consent –you have the right to withdraw your consent for us to process your data at any time by contacting us at the above address or by clicking the "unsubscribe" link on any marketing communications you receive from us.
- Right to lodge a complaint you may lodge a complaint with the Information Commissioner's Office.

8. Additional Information

There is no statutory or contractual requirement for you to provide your data to us and you are not obliged to do so. Please note, however, that we may not be able to provide you with the services you have requested if you do not provide your contact details.

We do not undertake automated decision-making or profiling on your data.

We review our privacy policy regularly and may change it to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website.

Your continued use of this website or our other marketing services, following the posting of changes to these terms, will mean you accept these changes.

Boston Partners (UK) Ltd. | 32 Cornhill, London, EC3V 3SG tel: +44 (0)20 3356 6225

www.boston-partners-uk.com



3