

# EQ Share Plans App - Privacy Notice

August 2023

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. In relation to the EQ Share Plans app this can include items such as your name, email address, identification numbers (such as an account number), location data or online identifiers.

The UK General Data Protection Regulation (GDPR) regulates the processing of personal data. The UK 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 organisations handling personal data must adopt.

This Privacy Notice is issued in compliance with UK 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. Updates to our Privacy Notice
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## 1 Who we are

Equiniti Limited is one company within the Equiniti Group. Our main business is administration services. Our registered address is Aspect House, Spencer Road, Lancing, West Sussex, BN99 6DA and our ICO registration number is: Z1028602.

Equiniti Limited is a **'Data Controller'**. This means that we are responsible for deciding how and why we hold and use personal data about you.

In this Privacy Notice, 'we', 'us' and 'our' will always mean Equiniti Limited, as Data Controller.

## 2 Products and services covered by this Privacy Notice

This notice applies to the EQ Share Plans app only. For further details about your Employee Share Plan (ESP) portal account and the ESP holdings shown, please see our full ESP Portals privacy notice which can be found in the footer of the ESP portal login page.

### IMPORTANT

This Privacy Notice relates only to the app that you log into in order to access your ESP portal services. The products and services provided through the ESP Portal each have their own privacy notices, issued by the relevant company (data controller) who offers the service. Some examples of this are shown below:

- Equiniti Global Nominee are offered by Equiniti Financial Services Limited.
- SAYE products are offered by your employer and a savings carrier.
- SIPs are offered by Trustees, such as Equiniti Share Plan Trustees Limited.
- Executive Discretionary Plans are offered by your employer.
- Global Employee Share Purchase Plans (GESPP) are offered by Trustees, such as Equiniti Share Plan Trustees Limited.

Where the data controller is a part of the Equiniti Group then the relevant privacy notice for the product or service can be found on our Privacy Centre: <https://privacy.equiniti.com/>

## 3 How we collect your personal data

- Information you provide to us through using this app. This data is limited to being an ID token. The token is a string of data which includes the email address you have provided to sign up to the app, a client ID reference number and your name.
- Information we collect about when and how you used our app, including information about your device and IP address which will include the capture of your location which is only used anonymously (via Google analytics).
- Information we receive from third parties such as network providers.

## 4 Why we collect your personal data

Under Data Protection legislation we must always have a lawful basis for processing your personal data.

By signing up to using this app you are consenting to sharing your personal data with us. To withdraw your consent you need to uninstall/delete the app from your mobile device and this will delete the token data that was collected through signing up to the app.

We are always looking to improve our app and ensure that the content of this app is presented in the most effective manner for you and for your device. To do this we undertake analysis of anonymised users data for troubleshooting, data analysis for research, statistical and survey purposes and assess how you interact with our app.

Please note that we process your personal data under both legal and contractual obligations for the underlying products. For further information please refer to the correct privacy notice for the products you hold on our Privacy Centre: <https://privacy.equiniti.com/>

## 5 How long we hold your personal data

Your ID token is held on your mobile device for as long as the app is installed. The token is a string of data which includes the email address you provided, a client ID reference and your name.

Information relating to your use of our app is retained in line with retention policies that are subject to regular review and assessment.

Please note that your underlying personal data will be retained as part of the products and services that we provide to you. This data will be kept in line with the relevant privacy notice for each product. Where part of the Equiniti Group is the data controller the relevant privacy notice for the product or service can be found on EQ's Privacy Centre: <https://privacy.equiniti.com/>.

## 6 The conditions under which we can share your personal data with others

The information we hold about you is confidential and we will only share your personal information to enable us to deliver the app service, examples are as follows:

- At your request.
- Other Equiniti Group entities who help us deliver these services.
- Non Equiniti entities, such as our agents in connection with running this app for you, including service suppliers and professional advisors.

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.

We will share your personal data when lawfully required with other third parties such as Regulators and supervisory authorities; police and law enforcement agencies.

## 7 Overseas Processing

Information collected relating to your use of the app is securely held in the UK.

## 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 use secure ways of communicating with you when providing your account information.

You must immediately inform us if you become aware, or suspect, that someone else has knowledge of your account details.

## 9 Your personal data rights and how to exercise them

You have rights in respect of the personal data that we hold about you. A summary of your rights is provided below. Some of these rights are conditional and depend upon why we are processing your personal data.

- The right to be informed about how we use your personal data.
- The right of access to a copy of any personal data Equiniti Limited processes about you, together with certain additional information.
- The right to request us to rectify or update your personal data such as when you change your email address.
- The right to request us to erase your personal data in certain situations.
- The right to request us to restrict processing such as when you disagree over the accuracy of the personal data.
- The right to request a copy of your information for data portability purposes when you have provided us with personal data and we have used automated processing.
- The right to object to us processing your personal data for example when you want us to stop any marketing to you.
- Rights related to decisions based solely on automated processing, again in specific circumstances.

Finally, if you believe your personal data is not being processed in accordance with data protection legislation you have the right to lodge a complaint to the relevant data protection supervisory authority in your country. Within the UK this is the Information Commissioner's Office (ICO) who regulates compliance with data protection legislation. They can be contacted by email: [casework@ico.org.uk](mailto:casework@ico.org.uk); post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF; or by telephone: 0303 123 1113. More information can also be found at [www.ico.org.uk](http://www.ico.org.uk).

## 10 Updates to our Privacy Notice

This Privacy Notice is current as of the last updated date above. Equiniti Limited may update this Privacy Notice from time to time. You acknowledge that your continued use of the app will be considered as acceptance of any changes to this Privacy Notice. We encourage you to periodically review this Privacy Notice for any changes. You can see when this Privacy Notice was last updated by checking the 'last updated' date displayed at the top of this Privacy Notice.

## 11 Contact Us

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 visit our Privacy Centre at <https://privacy.equiniti.com> where you will find general information about your rights, and how Equiniti safeguards your data; or contact our Data Protection Officer:

- By email: [DPO@equiniti.com](mailto:DPO@equiniti.com)
- By post: Data Protection Officer, PO Box 5243, Worthing, BN99 9FY
- By telephone: UK: 0333 207 5962 International: +44 121 415 0196  
Lines are open 8.30am to 5.30pm (UK time), Monday to Friday (excluding public holidays in England and Wales).