

Raymond James – General Privacy Notice

Introduction

Raymond James Financial International Limited (Reg. No. 03127076) whose registered office is at Ropemaker Place, 25 Ropemaker Street, London, England EC2Y 9LY ("**Raymond James**" or "**we**" or "**our**") is committed to respecting the privacy of individuals.

Raymond James is a "data controller". This means we are responsible for deciding how we will process your personal data.

This Privacy Notice ("**Notice**") and any other documents referred to in it, set out the basis on which we process personal data, why we collect, store, use and share personal data, and your rights in relation to your personal data under applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 and the UK GDPR (both the "**GDPR**").

The Data Protection Officer for Raymond James is Rob Patchett (Global Chief Privacy Officer and I.T Chief Compliance Officer). You may contact Rob Patchett by sending an email to RJEUPrivacy@raymondjames.com.

Personal Data We Collect

Raymond James may process the personal data of:

- Corporate clients and their representatives;
- Institutional investors;
- Counterparties;
- Professional contacts.

This list is not exhaustive.

We may collect and process the following personal data:

Information you give us:

If you:

- complete a form on our website;
- complete a survey;
- correspond with us by phone, e-mail, or in writing;
- report a problem;
- sign up to receive our communications;
- create an account with us;
- enter into a contract with us to receive or provide us with products and/or services.

We usually collect your name, e-mail address, postal address, telephone number and job role.

This list is not exhaustive.

Information we collect about you:

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
- if you visit one of our premises, offices, or branches, we may collect your physical image through our use of CCTV cameras;
- if you visit our website, we may collect your IP address and/or use cookies to gather further information about your use of our site. Further information about our use of Cookies is contained in our Cookies Policy;
- information about your visit to our website such as the products and/or services you searched for and viewed, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;
- telephone call information, as it is standard practice at Raymond James that we will record all external calls for training, compliance, security and evidentiary purposes even where these calls fall outside of our regulatory obligations.

This list is not exhaustive.

Information we receive from other sources:

We may also receive information about you if you use any of the other websites we operate or the other services we provide.

Raymond James may also collect personal data about you from third parties such as professional advisers, its related companies, recruitment agencies, public sources, or your employer.

This list is not exhaustive.

Information about other people:

If you provide information to us about any person other than yourself, such as your employees, relatives, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

This list is not exhaustive.

Special Category Personal Data:

Raymond James does not usually require such data in the normal course of its activities and services. In certain limited cases, we may collect certain special category personal data from you

(that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent and where required by regulation.

How We Use Personal Data

We collect and use your personal data mainly to provide our services and to ensure we meet our regulatory obligations.

Consent:

Sometimes we rely on your consent to use your personal information, for example:

- where you have opted-in to receiving marketing communications and have not subsequently opted-out or requested to be removed from any marketing list.
- where you have agreed to a meeting being recorded.

This list is not exhaustive.

You have the right to withdraw your consent at any time by contacting us using the contact information provided below.

Contract Performance:

Raymond James needs to process your data to take the necessary steps prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

We may use your personal data to fulfil a contract, or take steps linked to a contract to:

- provide products and/or services to you or in relation to products and/or services you provide to us;
- communicate with you in relation to the provision of the contracted products and services;
- provide you with administrative support such as account creation, security, and responding to issues;
- provide you with industry information, surveys, information about events, offers and promotions related to the products and/or services.

This list is not exhaustive.

Legitimate Interests:

Where this is necessary for purposes which are in our, or third parties', legitimate interests. These interests are:

- providing you with newsletters, surveys, information about our awards and events, offers, and promotions, related to products and services offered by Raymond James or related parties which may be of interest to you;
- providing the products and/or services to you or for you;
- providing you with administrative support such as account creation, security, and responding to issues;
- communicating with you in relation to any issues, complaints, or disputes;
- improving the quality of experience when you interact with our products and/or services, including testing the performance and customer experience of our website;
- performing analytics on sales/marketing data, determining the effectiveness of promotional campaigns;
- developing, improving, and delivering marketing and advertising for products and services offered by Raymond James or group companies.

This list is not exhaustive.

You have the right to object to the processing of your personal data on the basis of legitimate interests as set out below, under the heading “Your rights”.

Where Required by Law:

We may also process your personal data if required by law, including:

- registering your details with relevant regulatory bodies, governmental or quasi-governmental bodies;
- responding to requests by regulatory bodies, government, or law enforcement authorities;
- for the prevention of crime or fraud;
- recording and retaining data collected as part of our regulated processes including all forms of communication such as telephone and video conferencing calls, emails and face-to-face meetings for the purpose of our regulatory obligations with international regulators such as the FCA, BaFin, AMF etc;
- to comply with obligations relating to financial crime prevention, market abuse, anti-money laundering, counter-terrorist financing, and international sanctions;
- Insider information handling;
- Compliance with market abuse regulations.

This list is not exhaustive.

With Whom Do We Share Personal Data?

Where necessary we will share your personal data with other entities within the Raymond James Group, including those located outside the UK and European Union.

In such cases, we will ensure that all entities within our group comply with applicable data protection laws and that appropriate safeguards are in place to protect your personal data. These safeguards may include binding corporate rules or standard contractual clauses approved by the Information Commissioner’s Office or the European Commission (as appropriate) where the data protection authority does not believe that the third country has adequate data protection laws.

We take all reasonable steps to ensure that our staff protect your personal data and are aware of their information security obligations. We limit access to your personal data to those who have a genuine business need to know it.

We may also share your personal data with trusted third parties including:

- legal and other professional advisers, consultants, and professional experts;
- service providers contracted to us in connection with provision of the products and services such as providers of IT services and customer relationship management services;
- Data rooms and virtual deal platforms;
- analytics and search engine providers that assist us in the improvement and optimisation of our website.
- Regulatory bodies (e.g. FCA, BaFin, AMF)

We will ensure there is a contract in place with the categories of recipients listed above which include obligations in relation to the confidentiality, security, and lawful processing of any personal data shared with them.

Where a third party recipient is located outside the UK or EU, we will ensure that the transfer of personal data will be protected by appropriate safeguards, namely the use of standard data protection clauses adopted or approved by the Information Commissioner's Office or the European Commission (as appropriate) where the data protection authority does not believe that the third country has adequate data protection laws.

We will share personal data with law enforcement or other authorities if required by applicable law.

Use of Artificial Intelligence (AI)

We use general-purpose AI models to enhance our services. These models are designed to support a wide range of business tasks and are used to improve efficiency and service quality.

Examples include:

- Summarising documentation into key takeaways.
- Streamlining complex data-intensive coding tasks.
- Analysing financial datasets and extracting information from PDFs or spreadsheets.
- Assisting with administrative tasks such as meeting agendas

Important Notes:

- The use of personal data is avoided where possible. When personal data needs to be used or is unavoidable, we use only the minimum personal data required to perform the task
- AI does not perform profiling of individuals.
- All AI-generated content is initiated and reviewed by a human before being stored or used. This ensures accuracy and appropriateness of the content.

- We do not use AI for automated decision-making.

Lawful Basis:

Our use of AI is based on legitimate interests, shared with our clients in receiving efficient and personalised service.

Security and Data Protection:

Only company-approved tools are used.

Data processed by AI tools remains within our secure systems and is not used to train large language models.

We require vendors to ensure that prompts, responses, and data are not used for foundation model training.

Regular reviews are conducted to ensure our use of AI is in compliance with the GDPR, the EU AI Act, and the Data Protection Act.

How Long Will We Keep Personal Data?

Where there is a contract between us, we will retain your personal data for the duration of the contract with you or your company, and for a minimum period of six years following its termination or expiry, to ensure we are able to comply with any contractual, legal, audit and other regulatory requirements, or any orders from competent courts or authorities. We may, depending on your relationship with us, store your data for longer.

Where you receive marketing communications from us, you may change your preferences or unsubscribe from marketing communications at any time by clicking the unsubscribe link in an email from us.

Where Do We Store Personal Data and How Is It Protected?

We take reasonable steps to protect your personal data from loss or destruction.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 your personal data transmitted to our site; any transmission is at your own risk. Once we have received

your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

What If You Do Not Provide Personal Data?

You may also have to provide us with data in order to exercise your statutory rights. Failing to provide data may mean that you are unable to exercise your statutory rights or take up benefits that may be due to you.

Automated Decision Making

Employment decisions are not based solely on automated decision-making.

Your Rights

Under the GDPR, you have various rights with respect to our use of your personal data:

Right to Access

You have the right to request a copy of the personal data that we hold about you by contacting us at the email or postal address given below. Please include with your request information that will enable us to verify your identity. We will respond within 30 days of request.

Please note that there are exceptions to this right. We may be unable to make all information available to you if, for example, making the information available to you would reveal personal data about another person, if we are legally prevented from disclosing such information or if your request is manifestly unfounded or excessive.

Right to Rectification

We aim to keep your personal data accurate and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up to date.

Right to Erasure

You have the right to request the deletion of your personal data where, for example, the personal data are no longer necessary for the purposes for which they were collected, where you withdraw your consent to processing, where there is no overriding legitimate interest for us to continue to process your personal data, or your personal data has been unlawfully processed.

Right to Object

In certain circumstances, you have the right to object to the processing of your personal data where, for example, your personal data is being processed on the basis of legitimate interests and there is no overriding legitimate interest for us to continue to process your personal data, or if your data is being processed for direct marketing purposes.

Right to Restrict Processing

In certain circumstances, you have the right to request that we restrict the further processing of your personal data. This right arises where, for example, you have contested the accuracy of the personal data we hold about you and we are verifying the information, you have objected to processing based on legitimate interests and we are considering whether there are any overriding legitimate interests, or the processing is unlawful and you elect that processing is restricted rather than deleted.

Right to Data Portability

In certain circumstances, you have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format. This right arises where you have provided your personal data to us, the processing is based on consent or the performance of a contract, and processing is carried out by automated means.

Please note that there are exceptions to these rights. If we are unable to comply with your request due to an exception, we will explain this to you in our response.

Contact

If you would like to contact us about this Notice, our use of your personal data, or about exercising any of your rights, please contact us by email at RJEUPrivacy@raymondjames.com or by writing to us at:

Privacy Department, Raymond James, Raymond James, Ropemaker Place, 25 Ropemaker Street, London EC2Y 9LY.

Complaints

If you believe that your data protection rights may have been breached, and we have been unable to resolve your concern, you may lodge a complaint with the applicable supervisory authority or seek a remedy through the courts.

Changes to Our Notice

Any changes we may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Notice.