

**FIRST STATE INVESTMENTS
PRIVACY NOTICE
To Research Providers
18 July 2019**

Background

The purpose of this notice is to provide you with information on how First State Investment Management (UK) Limited, First State Investments International Limited and First State Investments (UK) Limited (together **Stewart Investors**) collects and uses your personal data.

This privacy notice supersedes any previous data protection notices provided to you. Further, this privacy notice does not operate to create an employment relationship with you to the extent you have not entered into a written contract of employment with Stewart Investors.

Information about us

References to “**we**,” “**us**” or “**our**” are references to Stewart Investors.

The data controller in relation to your personal data is First State Investment Management (UK) Limited of 23 St Andrew Square, Edinburgh EH2 1BB (Tel: +44 (0)131 473 2900).

Information we may collect about you

We may collect both special category personal data (for example, through our collection of information about your health) and criminal personal data (for example, through our collection of your criminal records) in relation to you.

From you

We may collect from you and process the following personal data about you in the context of your provision of research services to us:

- your name; address (including proof of name and address); photo; work contact details (for example, your email and phone numbers); specimen signature; gender; date of birth; national insurance number; passport and visa; qualifications and licences; training records; bank account information; employment/work history and directorships held (including company, role, former compensation and bonus, reference); employee benefits; share schemes;
- your nationality; citizenship status; and criminal records; and
- your personal data obtained through various monitoring activities that we conduct, namely, phone and electronic communications recording, CCTV footage.

From third parties

We may collect personal data about you from third parties in the context of pre-engagement searches and checks and during your engagement with us including, in particular:

- **background screening providers and referees** – information received includes financial checks, CV checks, regulatory checks, media checks, details of your suitability to work with us, your past performance at work, your character, verification of the information you provide to us as part of your application, criminal convictions (to the extent legally permitted and applicable) and opinions expressed by previous and current employers about you
- **ability and personality test vendors**
- **government and regulatory bodies** - including to obtain information regarding criminal records checks

How we will use the information we collect about you

We may process your personal data:

- for the purpose of performing your services to us under your letter of appointment or contract for services, including Stewart Investors' terms of business (the **Contract**). This includes: processing payments and reimbursement of expenses (where applicable); monitoring performance and general supplier management-related administration. We will require the personal data from you outlined above in order to be able to effectively administer your Contract.
- for monitoring purposes, namely, phone and electronic communications recording and CCTV footage. This is in order to check your performance under the Contract and/or for compliance purposes (e.g. ensuring you are compliant with all relevant legal and regulatory obligations).
- in order to comply with legal and regulatory requirements impacting our business. In particular, we may need in the context of our business: to obtain legal advice on legal and regulatory requirements; to report to relevant regulators; to comply with market opening, registration requirements and regulatory filings in the conduct of our business.

In addition to the above, we reserve the right to collate, process and disseminate any statistics based on an aggregation of data held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

In certain circumstances, not providing the requested data may affect our ability to meet the above purposes.

If you are an employee or contractor, we are entitled to use your personal data in these ways because:

- we need to in order to perform our obligations and exercise our rights in connection with your employment or services contract with us;
- the processing of your personal data is required to prevent and detect fraud or crime;

- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- we have legal and regulatory obligations that we need to discharge;
- the use of your personal data as described may be necessary for our legitimate business interests (or the legitimate interests of one or more of our affiliates), such as:
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the management of our employees/contractors and the employees/contractors of our affiliate companies worldwide; or
 - maintaining compliance with internal policies and procedures.

Disclosure of your information

- We may disclose your personal data to any member of our group, which means our affiliates, for internal administrative purposes.
- We may disclose your personal data to third parties that are specifically engaged by us to provide services to us, in which case we will require those parties to keep that information confidential and secure and to use it solely for the purpose of providing the specified services to us. We may also disclose your personal data to third party data controllers providing services or benefits to you in the context of your employment or service contract. The following is a list of the main categories of third parties to whom we disclose your personal data:
 - **Payment providers**
 - **Background screening providers**
 - **Vendors providing aptitude and personality tests**
 - **Law firms**
 - **Accountants**
 - **Regulators and competent authorities**
- We may disclose your personal data to third parties with whom we engage or contract in the conduct of our business. For example, we may need to provide to third parties (whether we are providing services and products to them or they are providing services and products to us) your work contact details, job title, and other personal data, to allow the third party to contact or transact with us. Such third parties may also record your telephone and other communications with them.
- We may disclose your personal data to other third parties, such as regulators and competent authorities, if we are under a duty to disclose or share your personal data in order to comply with a court order or other legal or regulatory requirement arising in the conduct of our business. 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.

Transfers outside the EEA

We may transfer your personal data to our overseas affiliates (including outside the EEA) and/or allow the information to be accessed by our affiliates and their employees outside the EEA as well as within in. It may also be processed by personnel operating outside the EEA who work for us or for one of our vendors.

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA or that the transfer is otherwise compliant with data protection laws. This can be done in a number of ways, for example:

- the country that we send the data to might be approved by the European Commission;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data;
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield Scheme;
- where data protection laws permit us to transfer your personal data outside the EEA.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting the HR Team.

How long will we store your data?

Personal data held by us will be kept confidential. How long we hold your personal data for will vary and will be determined by various criteria, including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Your rights in relation to your data

- You have a right to **access** the information which we hold about you. If you wish to make an application to access or obtain this information, please contact the Data Protection Officer at dpo@firststate.co.uk. In some circumstances, you have the right to receive some personal data which you have provided to us in a structured, commonly used and machine-readable format and/or request that we transmit that data to a third party where this is technically feasible.
- If you wish to **amend or update** your personal information outlined above please do so by emailing the Data Protection Officer (dpo@firststate.co.uk).
- If you wish us to **erase or restrict** using your data, please contact the Data Protection Officer (dpo@firststate.co.uk). We may need to discuss with you the basis of your request as there may be circumstances where we are legally entitled to continue processing your personal data/refuse your request.

- If you have previously provided your consent to our use of your data and you wish to **withdraw such consent**, please contact the Data Protection Officer (dpo@firststate.co.uk). We may need to discuss with you whether our use of your data needs to continue for lawful purposes (i.e. because we have another lawful basis for processing (other than your consent) for doing so).
- If you have any **complaints** in relation to the way we have used your information, please contact in the first instance, the Research Management Team (GSIResearchManagement@stewartinvestors.com) or the Data Protection Officer (dpo@firststate.co.uk). You also have the right to lodge a complaint with the **Information Commissioner's Office** at Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113) if you think that any of your rights have been infringed by us.