

PRIVACY NOTICE

1. Introduction

- 1.1. Welcome to the Stella Advisors Ltd's ("Stella EOC") privacy notice.
- 1.2. Stella EOC respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data whilst you are a client of ours and tells you about your privacy rights and how the law protects you.
- 1.3. It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

2. Controller

- 2.1. Stella EOC (collectively referred to as Stella EOC, "we", "us" or "our" in this privacy notice) is the data controller for the purposes of the General Data Protection Regulation (GDPR).
- 2.2. We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the data privacy manager using the details set out below.

3. Contact details

- 3.1. Our full details are:
 - Full name of legal entity: Stella Advisors Ltd
 - Name or title of data privacy manager: Fredrik Malmberg
 - Email address: dataprivacy@stellaeoc.com
 - Postal address: 64 Sloane Street, London, SW1X 9SH
- 3.2. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

4. The data we collect about you

- 4.1. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
- 4.2. We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:
 - 4.2.1. Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
 - 4.2.2. Contact Data includes billing address, delivery address, email address and telephone numbers.
 - 4.2.3. Financial Data includes bank account and payment card details.
 - 4.2.4. Investment Specific Data includes source of wealth and company information if you own your own business.
 - 4.2.5. Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- 4.3. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

5. If you fail to provide personal data

- 5.1. Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

6. How is your personal data collected?

- 6.1. We use different methods to collect data from and about you including through:
- 6.1.1. Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.
- 6.1.2. Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
- 6.1.2.1. Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.
- 6.1.2.2. Any data which you have made public i.e. on websites associated with you or your business.

7. Purposes for which we will use your personal data

- 7.1. We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 7.2. Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To provide with you any information you have requested from us about the services we offer	(a) Identity (b) Contact	Necessary for our legitimate interests (to respond to your request and to develop our services and grow our business)
To register you as a new client	(a) Identity (b) Contact	Performance of a contract with you
To: (a) Manage payments, fees and charges (b) Collect and recover money owed to us	(a) Identity (b) Contact (c) Financial (d) Transaction	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To deliver our services including: (a) Merger and acquisition advisory (b) Financing advisory (c) Principal investments (d) Wealth management	(a) Identity (b) Contact (c) Financial	Performance of a contract with you
To manage our relationship with you which will include: (c) Notifying you about changes to our terms or privacy policy (d) Asking you to leave a review	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our services)

To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact	Necessary for our legitimate interests (to develop our services and grow our business)
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8. Disclosures of your personal data

- 8.1. We may have to share your personal data with the parties set out below for the purposes set out in the table above.
- 8.1.1. External Third Parties as set out in the Glossary.
- 8.1.2. Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.
- 8.2. We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

9. International transfers

- 9.1. If your investment is outside of the European Economic Area (EEA), we may need to transfer your personal data outside of the EEA to be processed by a third party.
- 9.2. Whenever we transfer your personal data out of the EEA, if possible, we seek to ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:
- 9.2.1. Transferring your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- 9.2.2. Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.
- 9.3. If the above safeguards are not available, then we will seek your consent to transfer your data outside of the EEA.

10. Data retention

- 10.1. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
- 10.2. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

11. Glossary

11.1. LAWFUL BASIS

- 11.1.1. Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us
- 11.1.2. Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- 11.1.3. Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

11.2. THIRD PARTIES

- 11.2.1. External Third Parties

- 11.2.1.1. Service providers who provide IT and system administration services.
- 11.2.1.2. Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- 11.2.1.3. HM Revenue & Customs, regulators and other authorities, including those in Sweden and/or England and Wales, who require reporting of processing activities in certain circumstances.
- 11.2.1.4. Investment partners who will assist us in performing our contract with you.

11.3. YOUR LEGAL RIGHTS

11.3.1. You have the right to:

- 11.3.1.1. Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- 11.3.1.2. Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- 11.3.1.3. Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- 11.3.1.4. Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- 11.3.1.5. Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- 11.3.1.6. Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- 11.3.1.7. Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.