

## Description of Personal Data Processing

### Introduction

This statement describes the personal data processing that Dealogic carries out on behalf of its clients when it is acting as a data processor.

Unless otherwise agreed this statement constitutes the information required for the purposes of Article 28(3) of the General Data Protection Regulation (GDPR) in describing the nature and purpose of the processing, the types of personal data and categories of data subjects, and duration of the processing – see below. The obligations and rights of the controller are to comply with applicable data protection law and to enforce Article 28(3) GDPR provisions against Dealogic. If and to the extent the mandatory contract provisions contained or referred to in Article 28(3) GDPR are not already set out in an agreement between Dealogic and its client, they shall be deemed, with effect from the date of signature of the agreement, and notwithstanding any provision to the contrary in that agreement, to be incorporated by reference into that agreement. Insofar as there is any conflict between the data protection provisions in the agreement and the incorporated GDPR terms, the incorporated GDPR terms will prevail.

Where Dealogic is acting as a data processor in relation to the data in question it will only act on the written instructions of its clients under the applicable contractual arrangements, including any subcontracting/sub-processing.

Please note this description does not apply to the processing of personal data where Dealogic acts as a data controller. Please refer to the [Product Privacy Notice](#) for information about where Dealogic acts as a data controller.

The information below applies in respect of the following Products:

- Cortex (Coverage Manager, DCM Manager, ECM Manager, LevFin Manager, M&A Manager, Strategy Manager)
- DealManager (including TicketManager)
- Dealogic Connect
- Event Manager (including Client Manager, Conference Manager, IR Navigator)
- Pulse
- Electronic Prospectus Manager
- Institutional Client Strategy Manager

## *Nature and Purposes of processing*

The migration, setup and hosting of the personal data on the product platform to enable the client and its permitted users or its nominated joint controller, third party or counterpart to use the Product in accordance with the terms of the relevant licence agreement.

Our clients use the information in our Products for their own business purposes; to keep their own information up to date and to facilitate corporate access; to track consumption of resources and to ensure that activities are recorded and valued.

Our products facilitate interaction in the financial industry and the management of relationships, they also support our clients in demonstrating compliance with their regulatory obligations.

Dealogic will also provide technical and administrative support to clients and users.

## *Categories of Data Subjects*

The data subjects will be end users (employees, contractors or other individuals) who have been provided with access and permission to use Dealogic products or services by its clients. Other individuals may also be included in Dealogic products where their details have been added by colleagues or end users at other organisations (for example, their counterparty). The data subjects relevant to the Dealogic Connect and Event Manager products as follows:

- Buyside individuals
- Sellside individuals
- Permitted users of the Product (as defined under the contract with Dealogic).

## *Types of Personal Data*

The specific personal data sets processed by Dealogic may vary depending on the product or service in question but the types of personal data will usually include:

- First and second name;
- Business email and other contact details;
- Biographical information and professional qualifications;

- Documents, presentations, images, calendar entries and other data submitted, stored or sent by end users;
- Records of invitation to, or attendance at, conferences or corporate events;
- Report/alert preferences;
- Details of which Sellside or Buyside Individual placed an order, when and for whom
- Password or other credentials required to access the product or service.

Dealogic never intentionally processes sensitive personal data on behalf of its clients. However, if such information is recorded in our software products (for example, dietary requirements in EventManager), that information has been requested by and added to the Product by a client's permitted user.

## *Cross border transfers*

Dealogic is a global business. Information will be stored on servers within and outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for Dealogic or for one of its affiliates or suppliers. Those staff may be engaged in, among other things, the provision of support services. Where third party suppliers are based outside the EEA, Dealogic will take necessary steps to ensure we are aligned with the requirements of international data transfers under Chapter 5 of the GDPR.

## *Security*

Dealogic will take all steps reasonably necessary to ensure that information is treated securely and in accordance with the steps described in its [Security and Privacy Measures](#) document.

## *Retention periods*

Dealogic retains personal data in accordance with its agreements with its clients.

## *More Information*

For more information about Dealogic's data processing within its products please contact [privacy@dealogic.com](mailto:privacy@dealogic.com).