

## **APPENDIX A**

### **CATEGORIES OF INDIVIDUALS ABOUT WHOM WE MAY PROCESS PERSONAL DATA**

#### **I. Business contacts**

##### **Collection of personal data**

Vialto Partners processes personal data about individual contacts of existing and potential Vialto Partners clients. Such personal data may be collected directly from clients, potential clients and/or prior clients, as well as through networking, marketing or events.

The personal data collected may include name, employer name, job title, phone number, email and other business contact details. In addition, we may record information about our interactions with contacts.

##### **Use of personal data**

Personal data relating to business contacts may be used for the following purposes:

- **Administering, managing and developing our businesses and services**, including:
  - managing our relationships with clients and potential clients;
  - developing our businesses and services (such as identifying client needs and improvements in service delivery and learning more about a client relationship opportunity);
  - analysing and evaluating the strength of interactions between Vialto Partners and a contact;
  - performing analytics, including producing metrics for Vialto Partners leadership, such as on trends, relationship maps, sales intelligence and progress against account business goals;
  - administering and managing IT systems, websites and applications; and
  - hosting or facilitating the hosting of events.
- **Providing information about Vialto Partners and its services**
  - We use client business contact details to provide information that we think will be of interest about Vialto Partners and its services, in accordance with any permissions required by law. This may include industry updates and insights, other services that may be relevant and invites to events.

Vialto Partners does not sell or release personal data to third parties for purposes of allowing them to market their products and services without consent from individuals to do so.

## **Data retention**

Personal data will be retained for as long as we have, or need to keep a record of, a relationship with a business contact, which is for the duration of our relationship with a contact or their organisation. Personal data may be held for longer periods where extended retention periods are required by law, regulation, governmental directive or professional obligations and in order to establish, exercise or defend our legal rights in accordance with our data retention policy.

## **II. Clients and individuals associated with our clients**

This section applies to any personal data made available to us by our corporate and private clients.

### **Collection of personal data**

Our policy is to collect only the personal data necessary for agreed purposes and we ask our clients to only share personal data with us where it is strictly needed for those purposes.

Where we need to process personal data to provide professional services, we ask our clients to provide the necessary information to the applicable data subjects regarding its use. Our clients may use relevant sections of this privacy statement or refer data subjects to this privacy statement if they consider it appropriate to do so. Vialto Partners may also make this privacy statement directly available to data subjects when we are engaging directly with said data subjects, such as is the case with our private clients.

The categories of personal data processed by us in relation to the services we provide depend on the nature of the service we are providing, but may include:

- Personal details (e.g., name, age/date of birth, gender, country of residence);
- Inferences drawn from other personal data (e.g., marital status)
- Contact details (e.g., email address, contact number, postal address);
- Financial details (e.g., salary and other income and investments, benefits, tax status, bank accounts, payroll records, pensions);
- Government issued ID numbers (e.g., social security number, passport number, driver's license number, national health ID, tax ID);

- Alternate identifiers (e.g., non-sensitive identifiers used to identify parties, such as employee ID);
- Geolocation data (e.g., travel calendar data). For example, if a user of our myMobility application enables automatic calendar tracking, the application will use the device location of that user to determine the applicable state and/or country, which will then be used to update the user's calendar within the application for tax or other compliance purposes;
- Job details (e.g., role, grade, experience and performance information);
- Types of relationships (e.g., contact is a family member)
- Technical data (e.g., IP addresses, log data, data collected by cookies)

For purposes of certain services or activities, such as in performing client onboarding checks (including but not limited to "Know-Your-Customer", anti-money laundering and fraud checks) and providing our immigration and tax services, we may process "special" or "sensitive" categories of personal data. The scope of what qualifies as "special" or "sensitive" category data will be determined by Applicable Local Law, but may include, without limitation, biometric data, health data (e.g., information related to medical history, medical conditions or disabilities), financial account information, actual or alleged criminal history, trade union membership, sexual life or sexual orientation, political opinions, data revealing religious or philosophical beliefs or data revealing racial or ethnic origin.

Generally, we collect personal data directly from our clients or from third parties when providing services to the relevant client.

## **Use of personal data**

We use personal data for the following purposes:

- **Providing professional services**  
We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables, including but not limited to tax advisory and immigration advisory services.
- **Administering, managing and developing our businesses and services**

This includes:

- managing our relationship with clients and prospective clients;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- administering and managing IT systems, websites and applications; and
- hosting or facilitating the hosting of events.

- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures, including in connection with "Know-Your-Customer", anti-money laundering and fraud checks. As part of those procedures, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

- **Providing clients and prospective clients with information about us and our range of services**

We may use business contact details to provide information that we think will be of interest about us and our services in accordance with any permissions required by law. This includes industry updates and insights, other services that may be relevant and invites to events.

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

- **Improving and developing our services**

We are continually looking for ways to help our clients and improve our business and services. We may use information that we receive in the course of providing professional services for other lawful purposes, including (i) analytics, (ii) AI, (iii) analysis to better understand a particular issue, industry or sector, (iv) to provide insights back to our clients, (v) to improve our business, services, service delivery and offerings and (vi) to develop new Vialto Partners technologies and offerings. To the extent that the information we receive in the course of providing professional services contains personal data, we will de-identify or aggregate the data prior to using the information for these purposes.

## **Data retention**

We retain the personal data processed by us for as long as necessary for the purpose for which it was collected. Personal data may be held for longer periods where extended retention periods are required by law, regulation or our professional obligations or in order to establish, exercise or defend our legal rights in accordance with our data retention policy.

### **III. Individuals who use our applications**

We provide external users access to various applications managed by us. While certain applications may incorporate or refer back to this privacy statement, please note that such applications may instead contain their own privacy statements and/or terms and conditions explaining why and how personal data is collected and processed by those applications that differ from this privacy statement. We encourage individuals using our applications to refer to the privacy statements available on those applications, where applicable.

Where certain applications incorporate or refer back to this privacy statement, please refer to the relevant section of this Appendix A that is applicable to your relationship with us in connection with your use of the application.

### **IV. Individuals whose personal data we obtain in connection with providing professional services to our clients (i.e., client assignees):**

This section applies to any personal data made available to us by employees of our corporate clients who are engaging directly with us in connection with their receipt of our professional services (“client assignees”).

## **Collection of personal data**

Our policy is to collect only the personal data necessary for agreed purposes and we ask client assignees to only share personal data with us where it is strictly needed for those purposes.

With respect to services that we may provide to client assignees, we may process the following categories of personal data:

- Personal details (e.g., name, signature, age/date of birth, gender, country of residence);
- Inferences drawn from other personal data (e.g., marital status)
- Contact details (e.g., email address, contact number, postal address);

- Financial details (e.g., salary and other income and investments, benefits, tax status, bank accounts, payroll records, pensions);
- Government issued ID numbers (e.g., social security number, passport number, driver's license number, national health ID, tax ID);
- Alternate identifiers (e.g., non-sensitive identifiers used to identify parties, such as employee ID);
- Geolocation data (e.g., travel calendar data). For example, if a user of our myMobility application enables automatic calendar tracking, the application will use the device location of that user to determine the applicable state and/or country, which will then be used to update the user's calendar within the application for tax or other compliance purposes;
- Job details (e.g., role, grade, experience and performance information);
- Types of relationships (e.g., contact is a family member)
- Technical data (e.g., IP addresses, log data, data collected by cookies)

For purposes of certain client assignee services, we may process "special" or "sensitive" categories of personal data. The scope of what qualifies as "special" or "sensitive" category data will be determined by Applicable Local Law, but may include, without limitation, biometric data, health data (e.g., information related to medical history, medical conditions or disabilities), financial account information, actual or alleged criminal history, trade union membership, sexual life or sexual orientation, political opinions, data revealing religious or philosophical beliefs or data revealing racial or ethnic origin.

## **Use of personal data**

We use personal data for the following purposes:

- **Providing professional services**  
We provide a diverse range of professional services. Some of our services require us to process personal data in order to provide advice and deliverables.
- **Administering, managing and developing our businesses and services**  
This includes:
  - managing our relationship with clients;
  - developing our businesses and services (such as identifying client needs and improvements in service delivery);
  - administering and managing IT systems, websites and applications; and
  - hosting or facilitating the hosting of events
- **Security, quality and risk management activities**  
We have security measures in place to protect our and our clients'

information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We monitor the services provided to clients for quality purposes, which may involve processing personal data stored on the relevant client file. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to client engagements. We collect and hold personal data as part of our client engagement and acceptance procedures. As part of our client and engagement acceptance, we carry out searches using publicly available sources (such as internet searches and sanctions lists) to identify politically exposed persons and heightened risk individuals and organisations and check that there are no issues that would prevent us from working with a particular client (such as sanctions, criminal convictions (including in respect of company directors), conduct or other reputational issues).

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

- **Improving and developing our services**

We are continually looking for ways to help our clients and improve our business and services. We may use information that we receive in the course of providing professional services for other lawful purposes, including (i) analytics, (ii) AI, (iii) analysis to better understand a particular issue, industry or sector, (iv) provide insights back to our clients, (v) to improve our business, services, service delivery and offerings and (vi) to develop new Vialto Partners technologies and offerings. To the extent that the information that we receive in the course of providing professional services contains personal data, we will de-identify or aggregate the data prior to using the information for these purposes.

## **Data retention**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected. Personal data may be held for longer periods where extended retention periods are required by law, regulation, governmental directive or professional obligations and in order to establish, exercise or defend our legal rights in accordance with our data retention policy.

## **V. Websites**

This section describes how Vialto Partners handles personal data collected through [www.vialto.com](http://www.vialto.com) and any other Vialto Partners websites that link to this privacy statement (collectively, “the Websites”). For information regarding the terms and conditions for use of such Websites, please refer to the “Terms & conditions of use” available at <https://vialtopartners.com/terms>.

Some sites of the Websites may have privacy statements that differ from this one and/or contain additional information as required under Applicable Local Law. Please refer to the privacy statements on the sites you visit in order to understand how they collect and process your data. By accessing any sites available within the Websites or content within them, you (a) acknowledge you will review those privacy statements and (b) to the extent required under applicable law, by using such sites you accept and agree to the collection, processing and use of your personal data as described in those privacy statements.

### **Third Party Links**

The Websites may link to third-party sites not controlled by Vialto Partners and which do not operate under Vialto Partners’ privacy and security practices. When you link to third-party sites, Vialto Partners’ privacy and security practices no longer apply. We encourage you to review each third-party site’s privacy policy before disclosing any personal data through such third-party sites.

### **Collection of personal data through the Websites**

When you use our Websites, we may collect information about you and your use of the relevant site, including through cookies and analytics tools. We may collect personal data about you, such as your name, job title, company name, address, email address and telephone number, either directly from you or by combining information we collect via the Websites with personal data we collect and maintain through other channels (such as client relationship management systems or identification and access management systems, including IP addresses) or as we may lawfully collect from social media or other third-party sites.

Below are examples of how you may provide personal data to us via Websites:

- searching and browsing for content;
- subscribing to or ordering newsletters and/or publications;
- registering for premium online services;
- participating in “join our mailing list” initiatives;
- participating in bulletin boards, discussion or message forums;



- entering or responding to surveys;
- registering for events and conferences;
- contacting us for further information;
- visiting our Websites while logged into a social media platform; and/or
- providing us with other contact information, such as when filling out our “contact us” form.

We do not intend to collect “sensitive” or “special” categories of personal data through the Websites unless we are legally required to do so. The scope of what qualifies as “special” or “sensitive” category data will be determined by Applicable Local Law, but examples include (depending on the relevant local law), but are not limited to, race or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; physical or mental health; genetic data; biometric data; sexual life or sexual orientation; financial account information; and criminal records. We ask that you do not provide sensitive personal data of this nature when using the Websites. If you choose to provide sensitive personal data to us for any reason, the act of doing so constitutes your explicit consent, where such consent is necessary and valid under your Applicable Local Law, for us to collect and use that information in the ways described in this section of this privacy statement or as described at the point where you choose to disclose this information.

We also do not actively seek demographic information (such as age, sex, race or ethnicity) from visitors to the Websites. However, you may choose to provide such information. If you choose to provide demographic information to us, the act of doing so constitutes your explicit consent, where such consent is necessary and valid under applicable law, for us to collect and use that information in the ways described in this section of the privacy statement or as described at the point where you choose to disclose this information.

It is our policy to collect only the minimum amount of personal data required. If the Websites seek non-mandatory personal data about you, you will be notified of this at the point of collection. If you believe a Website has collected excessive information about you, please contact us at [privacy@vialto.com](mailto:privacy@vialto.com) to raise any concerns.

### **Use of personal data**

When you provide personal data to us through Websites, we may use it for any of the purposes described in this section of the privacy statement or as stated at the point of collection (or as would otherwise be reasonably expected from the context of collection), including:

- to administer and manage the Websites, including to confirm and authenticate your identity and prevent unauthorised access to restricted areas of the site;
- to personalise and enrich your browsing experience by displaying content that is more likely to be relevant and of interest to you;
- to sort and analyse user data (such as determining how many users from the same organisation are using the Websites);
- to determine the company, organisation, institution, or agency that you work for or with which you are otherwise associated;
- to develop our businesses and services;
- to conduct benchmarking and data analysis including, for example, regarding usage of the Websites;
- to conduct quality and risk management reviews;
- to understand how people use the features and functions of our Websites in order to improve the user experience;
- to monitor and enforce compliance with applicable terms of use, including acceptable use policies; and/or
- any other purposes for which you provided the information to Vialto Partners, including any of the purposes given in the 'Collection of personal data through the Websites' section above.

Our Websites do not collect or compile personal data for sale to third parties for consumer marketing purposes.

## **Cookies and Beacons**

We utilise cookies and other online identification technologies such as web beacons or pixels to provide users with an improved user experience. For more information, please see our [Cookie Policy](#).

## **Data retention**

We will retain your personal data on our systems only for as long as we need it, given the purposes for which it was collected, or as required to do so by law and in accordance with our data retention policy. We keep mailing list information until a user unsubscribes from our mailing lists. If you choose to unsubscribe from a mailing list, we may keep certain limited information about you so that we may honor your request.

## **Children**

We understand the importance of protecting children's privacy, especially in an online environment. The Websites covered by this privacy statement are not intentionally designed for or directed at children, and our terms and conditions

of use require all users to be above the age of majority in their local country. We adhere to laws regarding marketing to children. We never knowingly collect personal data about individuals under the age of 18 through our Websites.

#### **VI. Others who get in touch with us**

We collect personal data when an individual gets in touch with us with a question, complaint or feedback (such as name, contact details and contents of the communication). In these cases, the individual is in control of the personal data shared with us. We only use the data as necessary to respond to the communication or resolve the complaint.

#### **VII. Recruitment applicants**

We collect personal data in connection with our recruitment activities. Please refer to our recruiting privacy policy made available to you at the time of collection of your personal data for information on why and how personal data is collected and processed in relation to your application with Vialto Partners.

#### **VIII. Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors):**

##### **Collection of personal data**

We collect and process personal data about our suppliers (including subcontractors and individuals associated with our suppliers and subcontractors) in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide professional services to our clients. The personal data is generally business contact data and may include name, employer name, title, phone, email and other business contact details and the communications with us, and such personal data may be collected directly from the suppliers, subcontractors or individuals, as well as through networking, marketing or events and, where applicable, directly from the client where a specific vendor is requested by the client.

##### **Use of personal data**

We use personal data for the following purposes:

- **Receiving services**

We process personal data in relation to our suppliers and their staff as necessary to receive the services they are contracted to provide.

- **Providing professional services to clients**

Where a supplier is helping us to deliver professional services to our clients, we process personal data about the individuals involved in

providing the services in order to administer and manage our relationship with the supplier and the relevant individuals and to provide such services to our clients.

- **Administering, managing and developing our businesses and services**

This includes:

- managing our relationship with suppliers;
- developing our businesses and services (such as identifying client needs and improvements in service delivery);
- hosting or facilitating the hosting of events; and
- administering and managing IT systems, websites and applications

- **Security, quality and risk management activities**

We have security measures in place to protect our and our clients' information (including personal data), which involve detecting, investigating and resolving security threats. Personal data may be processed as part of the security monitoring that we undertake; for example, automated scans to identify harmful emails. We have policies and procedures in place to monitor the quality of our services and manage risks in relation to our suppliers. We collect and hold personal data as part of our onboarding and due diligence processes as well as supplier contracting procedures. We monitor the services provided for quality purposes, which may involve processing personal data.

- **Providing information about us and our range of services**

We use business contact details to provide information that we think will be of interest about us and our services in accordance with permissions required by law. This includes industry updates and insights, other services that may be relevant and invites to events.

- **Complying with any requirement of law, regulation or a professional body of which we are a member**

As with any provider of professional services, we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

## **Data retention**

We retain the personal data processed by us for as long as is considered necessary for the purpose for which it was collected in accordance with our data retention policy. Personal data will be retained about our contacts at our suppliers for as long as it is necessary for the purposes set out above (e.g., for as long as we have, or need to keep a record of, a relationship with a contact). Personal data may be held for longer periods where extended retention periods

are required by law or regulation or in order to establish, exercise or defend our legal rights.

**IX. Vialto Partners Personnel (partners, staff and contractors):**

We collect personal data concerning our own personnel (partners, staff and individual contractors) to administer the employment relationship and manage our business.

Please refer to the employee privacy notice available on Vialto Partners' internal Human Resources SharePoint page for information on why and how personal data is collected and processed in relation to your role with Vialto Partners.

**X. Visitors to our offices:**

We have security measures in place at Vialto Partners offices, which may include CCTV, building access controls and other such security monitoring technologies.

**CCTV**

We only perform CCTV monitoring where allowed by law. CCTV images captured are securely stored and only accessed on a need to know basis (e.g., to look into an incident). We use the CCTV images for the legitimate purposes of promoting security and safety of our personnel and members of the public, preventing and detecting crime and establishing, exercising and defending legal claims. We may disclose CCTV images to law enforcement bodies as requested and permitted by law.

CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft).

**Visitor records**

We require visitors to our offices to sign in at reception and we keep that record of visitors for a short period of time. Our visitor records are securely stored and only accessible on a need to know basis (e.g., to look into an incident).

**Guest WIFI**

We may monitor traffic on our guest Wi-Fi networks using industry standard intrusion detection systems. This allows us to see limited information about a user's network behaviors but will include being able to see at least the source

and destination addresses the user is connecting from and to. We cannot inspect encrypted web pages and therefore do not have access to any information (personal or otherwise) that the user might share via these web pages.