

DATA PROTECTION NOTICE - SHAREHOLDERS

FINEOS Corporations Holdings PLC ("FINEOS")

1. Purpose of Notice

This notice sets out how personal information relating to you, as a prospective investor in CDIs in FINEOS and/or a shareholder in FINEOS, or that of your directors, officers, employees and/or beneficial owners ("**Personal Data**") will be handled by FINEOS, as the controller of the Personal Data (as specified in Section 3 of this notice below) and/or on its behalf by its third party service providers.

2. Personal Data Processed by FINEOS

FINEOS processes your Personal Data as provided to it or its relevant service providers on your completed Application Form, Personal Data that it collects, generates or observes while administering your application for CDIs and other Personal Data you provide to FINEOS or its third party service providers acting on FINEOS' behalf such as AML/KYC information. This information includes, but is not limited to:

- a. **Information provided to FINEOS by you:** this might include, but is not limited to, your name and address (including proofs of name and address), contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information.
- b. **Information that FINEOS collects, generates or observes:** this might include, but is not limited to, information relating to your application for CDIs or your shareholding in FINEOS, emails, call recordings and website usage data.
- c. **Information that FINEOS obtains from third party sources:** this might include, but is not limited to, information obtained for the purpose of FINEOS AML/KYC procedures, information from public websites, social media and information received from your advisors or from intermediaries such as credit reference agencies, AML screening tools etc.

3. Why FINEOS Processes your Personal Data

FINEOS collects and processes your Personal Data on various legal bases and for numerous different purposes, including those set out below.

Legal Basis	Purpose(s)
<p>Performance of a Contract</p> <p>FINEOS must process your Personal Data in order to enter into and perform its contract with you as a prospective shareholder in FINEOS.</p>	<ul style="list-style-type: none"> • To take the necessary steps to facilitate and conclude a contract with you for the purchase of CDIs in FINEOS. • If you do not provide us with your personal data for these purposes, we will not be able to review your application or conclude the purchase by you of CDIs in FINEOS.

Legal Basis	Purpose(s)
<p>Legitimate Interests</p> <p>FINEOS may process your Personal Data in order to exercise or preserve its legitimate business interest(s).</p> <p>Where we rely on our legitimate interest to process your Personal Data, we will take appropriate steps to ensure the processing does not infringe your rights or interests.</p>	<ul style="list-style-type: none"> • To assess initial applications for CDIs and to facilitate the purchase of CDIs in FINEOS. • Where you are not an individual shareholder, to facilitate the management and administration of holdings and dealing in FINEOS including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests and the processing and verification of instructions. • To make relevant disclosures in the course of a merger, acquisition or bankruptcy of FINEOS or a FINEOS affiliate (to the extent applicable). • To manage FINEOS, including monitoring and resolving complaints. • To validate and verify information for security purposes. • To send administrative information relevant to the shareholding in FINEOS.
<p>Compliance with Legal Obligation</p> <p>FINEOS may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> • On becoming a holder of CDIs, the Irish Companies Act 2014 and the Irish Corporations Act 1840 require information about you (including your name, address and details of the interests/percentages you hold) to be included in the FINEOS register. ASX will also require FINEOS to maintain a register of CDI holders which will also contain similar information about you. • This information is required by statute to remain on FINEOS' register even if you cease to hold CDIs. • To ensure compliance with FINEOS' business, tax and regulatory obligations. • To assist FINEOS' auditors in the auditing of FINEOS in accordance with its legal obligations. • To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering and/or terrorist financing, including "know your customer" and other necessary onboarding and ongoing investor checks. • In accordance with the requirements of the Irish Companies Act 2014 and the Irish Corporations Act 1840, information on the register is accessible by members of the public.
<p>To Defend, Establish or be a Party to Legal Claims</p> <p>We may process your Personal Data as necessary in order for us to establish, investigate, exercise or defend a legal claim to which you are a party.</p>	<ul style="list-style-type: none"> • To investigate, establish, exercise or defend a legal claim.

4. Third Party Recipients of your Personal Data

FINEOS may disclose your Personal Data to its relevant service providers and/or other third parties including, but not limited to:

- consultants;
- the Australian Securities Exchange (ASX);
- law enforcement agencies or regulatory authorities;
- service and insurance providers;
- registry operators and registry maintenance providers;
- other entities in the FINEOS group; and
- external advisors.

FINEOS or its service providers may also disclose your Personal Data to any other persons or entities as agreed between FINEOS and the relevant service provider, or as may be required or expressly permitted by applicable laws.

5. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out in Section 4 may involve the transfer of data to Australia, New Zealand and the USA, and other jurisdictions outside the European Economic Area ("**EEA**"), which may not be the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the GDPR where appropriate safeguards are in place to protect your personal data. If you would like to find out more about these safeguards, please contact DPO@Fineos.com.

6. Retention of your Personal Data

FINEOS will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods include:

- the length of FINEOS' relationship with you;
- whether there is a legal obligation to which FINEOS is subject (such as retaining Personal Data obtained for the performance of AML and related checks, which will be kept for **5 years** after termination of the relationship); and
- if you purchase CDIs and, in light of FINEOS's legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), your Personal Data may be kept for up to **7 years**; and
- if you apply for, but do not complete a purchase of CDIs, your Personal Data may be kept for up to **1 year**.

7. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for FINEOS' legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
Right of Access	You have the right to request a copy of the Personal Data held by FINEOS about you and to access the information which FINEOS holds about you free of charge. FINEOS may charge you for making any additional access requests where it feels your request is unjustified or excessive.
Right to Object	You have a right to object at any time to the processing of your Personal Data where FINEOS processes your Personal Data on the legal basis of pursuing FINEOS' legitimate interests.

Right to Rectification	You have the right to have any inaccurate Personal Data which FINEOS holds about you updated or corrected.
Right to Erasure	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see above) and FINEOS does not have an overriding reason to process your Personal Data or if FINEOS no longer requires your Personal Data for the purposes as set out in this notice.
Right to Restriction of Processing	You have the right to ask FINEOS to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data FINEOS holds about you is inaccurate or FINEOS' use of your information is unlawful. If you validly exercise this right, FINEOS will store your Personal Data and will not carry out any other processing until the issue is resolved.
Right to Data Portability	You may request FINEOS to provide you with your Personal Data which you have given FINEOS in a structured, commonly used and machine-readable format and you may request FINEOS to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) FINEOS processes your Personal Data with your consent or where it is necessary to perform FINEOS' contract with you; and (2) the processing is carried out by automated means.

Where FINEOS requires your Personal Data to comply with anti-money laundering or other relevant legal requirements, failure to provide this information may prevent your application for any future dealing of CDIs in FINEOS.

Should you consider that the processing of your Personal Data by FINEOS or its service providers infringes the provisions of the GDPR, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place where an alleged infringement occurred.

8. Contact Us

If you have any questions in relation to FINEOS' use of your Personal Data, or would like to submit a request with respect to your rights above, please contact us at DPO@Fineos.com .