

SHAREHOLDERS - DATA PRIVACY NOTICE

International Workplace Group plc (“IWG PLC”) is committed to protecting the privacy and security of your personal data. The privacy notice below sets out our privacy practices as to how we may collect, use, and/or share your personal data in the context of our relationship with you as shareholder. We will collect and use your personal data as described in this privacy notice and as permitted by applicable laws, where (i) necessary to fulfil a contract with you (to carry out our obligations to you as a shareholder), (ii) you have given us your express consent, (iii) it is necessary for one or more of our legitimate interests, or (iv) it is necessary for us to fulfil a legal obligation.

1. THE PERSONAL DATA WE COLLECT AND WHY

We collect your personal data when you register as a shareholder and when you interact with us in relation to your shareholding with us. This includes when we receive your personal information from third parties, for example, share registrars and brokers.

We may collect the following information: your name, title, address, phone number, e-mail address, date of birth, identification documentation such as passport information or national insurance number, bank account details, shareholder records (including shares held, share purchases, share disposals, dividend entitlements and payments, votes, proxy appointments, shareholder options, exercise conditions and exercise dates) and copies of enquiries, complaints and other correspondence and communications with you as a shareholder.

The personal data we collect will be held and processed by IWG plc for the following purposes:

1. To manage our relationship with you as a shareholder, including:
 - to allow you to exercise your shareholder rights;
 - to include you on our register of shareholders and maintain your entry;
 - to make dividend payments to you;
 - to contact you with shareholder-related information, including shareholder announcements and information about dividend distributions, reports and meetings, including our Annual General Meeting; and
 - to provide information to our registrars.
2. To pursue our following legitimate interests:
 - to produce and maintain shareholder records, announcements and communications;
 - to review and respond to any enquiries and complaints submitted by shareholders;
 - to conduct data analytics studies to review and better understand and monitor shareholder patterns;
 - for proper management of our business, including seeking legal advice where necessary; and
 - for proper record-keeping purposes relating to IWG plc’s business and shareholdings.
3. To comply with any of our legal or regulatory requirements not covered above.

If you fail to provide certain information, we may not be able to perform our obligations to you, or we may be prevented from complying with our legal obligations.

2. WHAT HAPPENS TO PERSONAL DATA ONCE IT IS COLLECTED

In certain circumstances we may need to share your personal data with third parties such as our share registrars and brokers. In some cases, personal data may be transferred to jurisdictions outside of Jersey and the EEA that are not deemed to provide an adequate level of data protection by the European Commission. Where necessary, we will put in place appropriate safeguards to ensure an adequate level of data protection. We will only share your personal data in accordance with data protection legislation and only such personal data as is necessary for the services the relevant third party is to provide to us. Similarly there may be certain circumstances in which we are required to disclose your personal data to other third parties including government bodies and regulators in order to conform to any requirements of law, to comply with any legal or regulatory process, for the purposes of obtaining legal advice or to prevent and detect fraud. Again, we will only do so in accordance with data protection legislation.

3. SECURITY

The security and confidentiality of any personal data collected is maintained through its storage in our datacentre, which is both secure and has limited and controlled access through a centralised identity management system. Our Datacentre is ISO27000 certified (the ISO/IEC 27000 family of mutually supporting information security standards (also known as the ISO 27000 series) is developed and published by the International Organization for Standardization and the International Electrotechnical Commission to provide a globally recognised framework for best-practice information security management). Communication of the data between our centres and our data centre is encrypted to ensure that it is protected from capture by any third party in transit.

All data transfer with our desktop estate is protected through a number of security tools including anti-virus, content and spam filtering, website protection and browser security; all of which follow industry best practice. Email communication from us is currently based upon the Microsoft 365 platform with a redundant cloud based tenant based in Europe which serves all our centres globally and which is both secure and provides control from unauthorised access.

We regularly perform penetration testing to ensure that controls are constantly improved to prevent unauthorised access to our networks and data.

4. MINIMISING RISK

Whilst we take necessary precautions and follow industry best practice to protect the data we hold, due to the nature of cyber threats, through for example phishing and other forms of compromise attacks, risks can never be completely eliminated.

5. RETENTION POLICY

Our general rule is that we only hold personal data for as long as necessary. As such, we hold your personal data whilst you are a shareholder and for a period of 10 years after you cease to be a shareholder.

In some circumstances, we may retain personal data for other periods of time, for instance where we are required to do so in accordance with legal, tax and accounting requirements, or if required to do so by a legal process, legal authority, or other governmental entity having authority to make the request, for so long as required. In specific circumstances, we may also retain your personal data for

longer periods of time corresponding to a statute of limitation, so that we have an accurate record of your dealings with us in the event of any complaints or challenges.

6. YOUR RIGHTS

You may have some or all of the following rights available to you in respect of your personal data:

- The right to access.
- The right to rectification.
- The right to erasure.
- The right to data portability.
- The right to object to, or restrict, or withdraw your consent for, processing.

Issues or concerns you may have regarding your personal data can be brought to the attention of the Jersey Office of the Information Commissioner. In addition, for more information on your rights please read the guidance issued by the Jersey Office of the Information Commissioner available here: <https://jerseyoic.org/for-individuals/>.

If you would like more information about how we process your personal data, please send your questions to: gdpr@iwgplc.com.